Independent Environmental Audit Report 10 (IA10)

Sydney Metro

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

Audit Date: 11 August 2026

Morasey Ref: MESYM: 2026106-06

Morasey Environment Pty Ltd
[redacted]
ABN: 17 637 707 647

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EXECUTIVE SUMMARY

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (SM-WSA) Finishing and Auxiliary Works (FAW). This audit is the 10th IEA conducted for the WSA project, and the 7th IEA conducted for Footbridge St Mary's (FSM).

The temporal period covered by the audit is between the date of the 9th SM-WSA IEA (IA9) on 18th February 2026 to the date of the site inspection for this IEA 10 (IA10) on 11th August 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:	Development of the Sydney Metro Western Sydney Airport project comprising: • construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly, • construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct, • interchange links with the existing T1 Western Line rail line, • construction and operation of a train stabling and maintenance facility, including an operational control centre, • construction and operation of associated rail infrastructure facilities, • construction of tunnels, bridges, viaducts and associated works, • site preparation and enabling earthworks, including land remediation, • associated ancillary infrastructure and works.

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

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

In summary, a total of **222 conditions** were assessed. **One non-compliance** (self-reported) and **three 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 10

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 10th IEA conducted for the SM-WSA project, and the 7th 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 13.0, June 2026 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 13.0) 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 9 (IA9) on 18th February 2026 to the date of the site inspection for this Independent Audit 10 (IA10) on 11th August 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 11th August 2026. The following activities were undertaken during the audit period:

Footbridge St Mary's (FSM):

- Footpath and services work along Harris Street
- Service works and excavation on the northern plaza
- Fit out and testing in the Sydney Trains building
- Service installation in the future Northern Plaza
- Stair and escalator installation activities
- Lift internal works and glazing
- Paving
- Footbridge concourse containment installation
- Station building containment installation and blockwork installation
- Ongoing use of Laydown Area 1.

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. IA10 covers the period from 18th February 2026 to 11th August 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 11th August 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 Conditions 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 IA10.

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 8th July 2026. 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 9th July 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 9th July 2026. No response was received from DPHI.	N/A
NSW EPA	Scope consultation correspondence issued to NSW EPA on 9th July 2026. EPA responded on 14th July 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 9th July 2026. No response was received from LCC.	N/A
Penrith City Council	Scope consultation correspondence issued to Penrith City Council on 9th July 2026. PCC responded by phone on 31st July 2026 and discussed general parking and traffic arrangements around St Mary's Station. No formal response was received.	Refer Conditions E103-E119 in the Audit Table, Appendix 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	[redacted]	Audit scheduling and project management
Sydney Metro	Environment Manager Western Sydney Airport Project Delivery	[redacted]	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Laing O'Rourke	Environmental Advisor	[redacted]	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
TfNSW	Environment & Sustainability Manager	[redacted]	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Laing O'Rourke	Project Leader	[redacted]	Closing meeting & provision of evidence
HBI	Environmental Representative	[redacted]	Interview

2.3 Site Inspection and Meetings

The site inspection, opening and closing meetings were held with Project personnel as identified in **Table 3**. The site inspection was conducted on 11th August 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 11th August 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 7th September 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: 11th August 2026
- Environmental Representative: 12th August 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) Rev06, Laing O'Rourke, dated 18/2/2026
- 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) Rev17, dated 20/5/2026
- 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 13, 1 June 2026
- 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 – February-August 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 10th Independent Audit (IA10). A summary of the number of conditions assessed and compliance status from IA10 is presented in **Table 5**. An overview of each finding and recommendation is presented in **Table 6**.

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

Table 5: Summary of conditions assessed and compliance status

SSI 10051 Part	No. Conditions Assessed	Compliance Status			
		Compliant	Non-Compliant	Not Triggered	Observation
Part A	47	**31**	**0**	16	0
Part B	11	**6**	**0**	5	0
Part C	22	**10**	0	12	**2**
Part D	8	0	0	8	0
Part E	134	**59**	**1**	74	**1**
TOTAL	**222**	**106**	**1**	115	**3**

In summary, a total of **222 conditions** were assessed. **One non-compliance** (self-reported) and **three Observations** with recommendations for improvement were identified during the audit.

A summary of findings from IA10 has been presented in **Table 6**. Positive observations are discussed in **Section 4.7**.

Findings from the previous Independent Audit (IA9) were also reviewed. The Auditor was satisfied that all findings from IA9 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 (IA9) are presented in **Table 7**.

Table 6: Summary of Compliance Status – IA10 (11 August 2026)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
NON-COMPLIANCES					
Self-Reported NC001	**E57**	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 prior to the out-of-hours work commencing on request.	A Non-compliance with **Condition E57** was self-reported during the audit period. **CoA E57** states "*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 prior to the out-of-hours work commencing on request*." The draft E57 report was sent to the ER on the 28/4/2026 for review with works commencing on the 02/05/2026. The final E57 report was provided to the ER for information, 2 days post works commencing which is inconsistent with what the timing outlined within the Planning Approval. The impact of the non-compliance was minor as this was an administrative mistake. No respite periods were triggered for the out-of-hours work. Corrective actions raised included: Reminders will be in place in Laing O'Rourke's Environmental teams calendars to ensure E57 reports are sent the Environmental	The actions raised and closed-out by the Proponent and Contractor were assessed during the audit. *No further actions or recommendations are considered necessary.*	**Responsibility:** N/A **Due Date:** N/A **Status:** N/A

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
			Representative prior to work commencing in the future.		
OBSERVATIONS					
OBS01	**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.	Non-compatible storage of hazardous chemicals (Flammable Liquids stored in a cabinet with Flammable Gases) was identified in the LOR site compound.	Remove Flammable Gases (aerosols) from the Flammable Liquid cabinet and store in a designated, ventilated Flammable Gas cage.	**Responsibility:** LOR **Due Date:** 14.9.2026 **Status: OPEN**
OBS02			A small area of stabilised earth was observed in the location of the form water tanks in the LOR site compound. ERSED controls were not in place.	Stabilise the area and/or apply ERSED controls to reduce the risk of sediment run-off.	**Responsibility:** LOR **Due Date:** 14.9.2026 **Status: OPEN**
OBS03	**E41**	Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances: (c) By Approval, including: (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E42	Dates and times recorded on FieldView Noise Verification Record Sheets don't align with the data in the Noise Monitoring Register. LOR has advised this is a FieldView glitch for which a solution hasn't been found to date.	LOR to investigate FieldView system issues internally.	**Responsibility:** LOR **Due Date:** TBA by LOR **Status: OPEN**

Table 7: Review of previous audit findings – IA9 (18 February 2026)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA8 ASSESSMENT & 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 "*Construction of fencing or any physical barrier between installation areas and the vegetation to be installed where required*".	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** N/A **CLOSED during IA9** *No further actions or recommendations are considered necessary.*
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 "*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*". 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 "*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***	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: CLOSED** *No further actions or recommendations are considered necessary.*

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA8 ASSESSMENT & STATUS
			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 was provided during IA10.		
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.	**Responsibility:** LOR Environment Manager **Due Date:** Immediately **Status: CLOSED** *No further actions or recommendations are considered necessary.*
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.	**Responsibility:** LOR Environment Manager **Due Date:** Within 5 Days **Status: CLOSED** *No further actions or recommendations are considered necessary.*
OBS3	**C13**	The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies (as required by Condition A6) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in Condition A1 or in the CEMP. Where	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 table prepared to set out the applicability of requirements relating to CEMP environmental management categories - FAW, rather than the superseded AEW).	Update the Staging Report accordingly.	**Responsibility:** Sydney Metro Environment Manager **Due Date:** During the next review of the Staging Report **Status: CLOSED** *No further actions or recommendations are considered necessary.*

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA8 ASSESSMENT & STATUS
		a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why.			
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: CLOSED** *No further actions or recommendations are considered necessary.*

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 February to July 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 8th July 2026 to obtain input on the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR. 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**:

- Improvements were observed in waste management and general housekeeping within the site compound and other work and laydown areas.
- The ongoing implementation of archaeological monitoring and maintaining associated records.
- Ongoing noise monitoring and associated compliance activities during out of hours works under the OOHW Protocol.

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 10th Independent Audit conducted for the SM-WSA project, and the 7th IEA conducted for FSM, covering the period from 9th February 2026 to 11th August 2026.

In summary, a total of **222 conditions** were assessed. **One non-compliance** (self-reported) and **three 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, Laing O' Rourke for their organisation, cooperation and support during the audit.

6. SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

	
Photo 1: LOR site compound – waste was contained in lidded skip bins and no litter was observed	**Photo 2:** Bunded fuel cell with drip tray
	
Photo 3: Spill kit in place adjacent to the fuel cell	**Photo 4:** Former water tank area – requires stabilisation

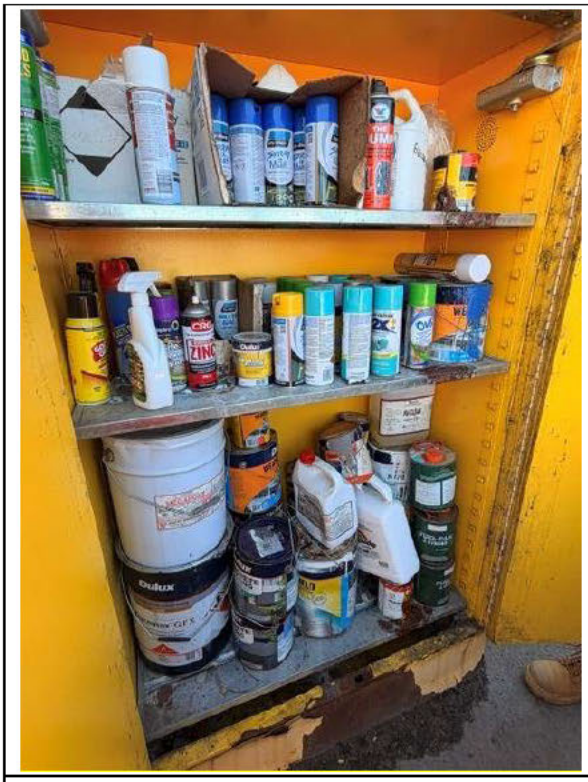


Photo 5: Incompatible hazardous chemical storage in the Flammable Liquids cabinet



Photo 6: Northern plaza – landscaping works



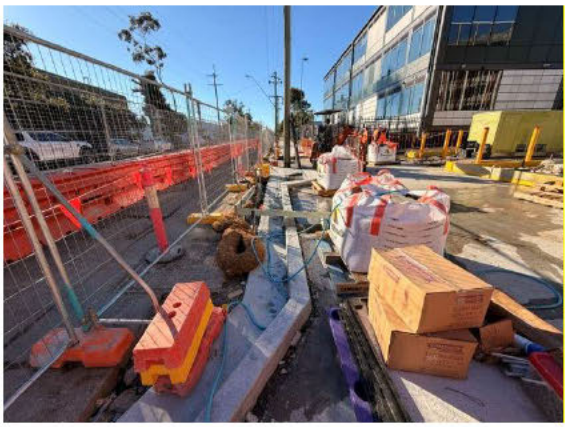


Photos 7 & 8: Footbridge stair access from the Northern plaza.





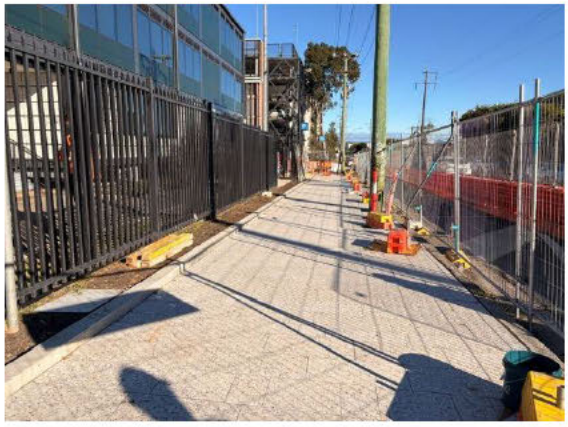
Photos 9 & 10: Northern plaza – paving and hardstand in place, reducing ERSED risks.





Photos 11 & 12: Works zone in place for alternative pedestrian access during Northern plaza and Harris Street footpath works.



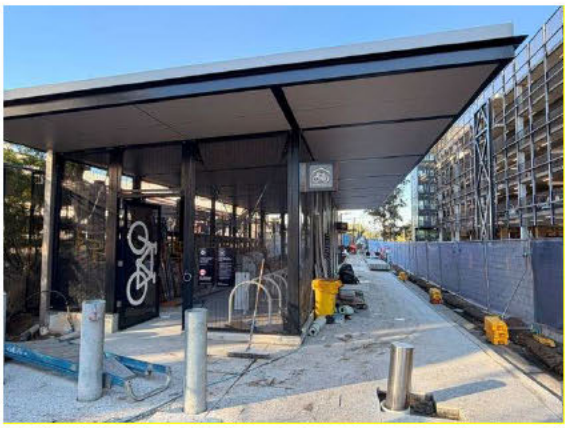


Photos 12 & 13: Northern plaza and Harris Street footpath works.

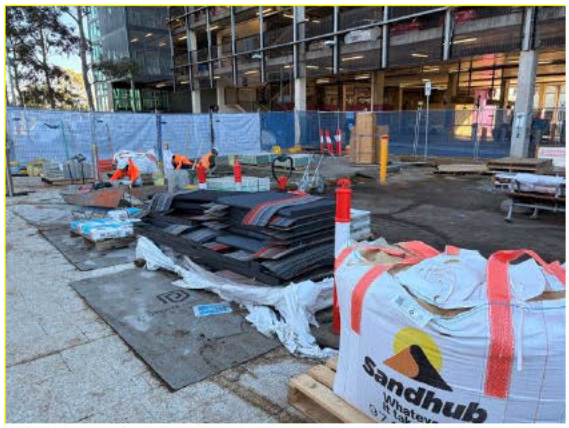




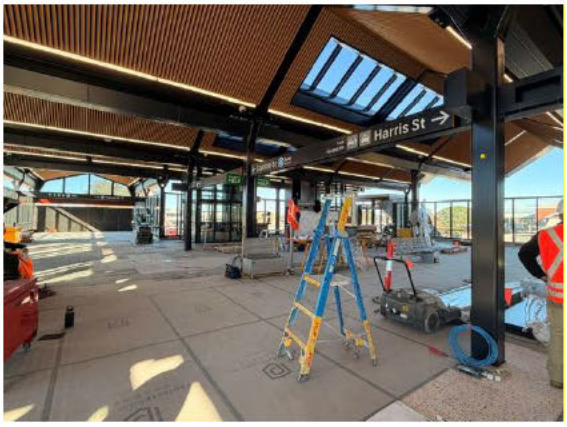
Photos 14 & 15: Western plaza – landscaping works

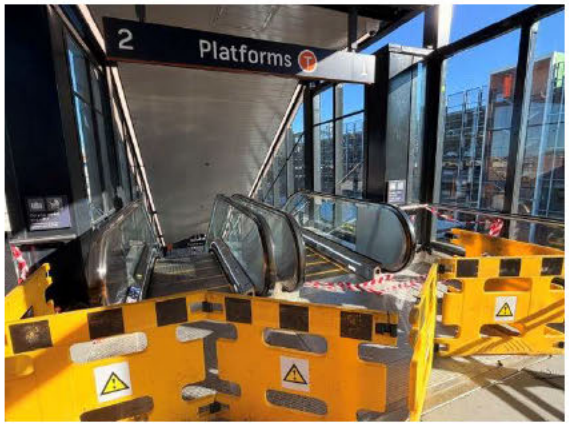






Photos 16-18: Western plaza – Bike shelter in place and finishing works ongoing





Photos 19 & 20: Platform signage in place and escalator testing underway.



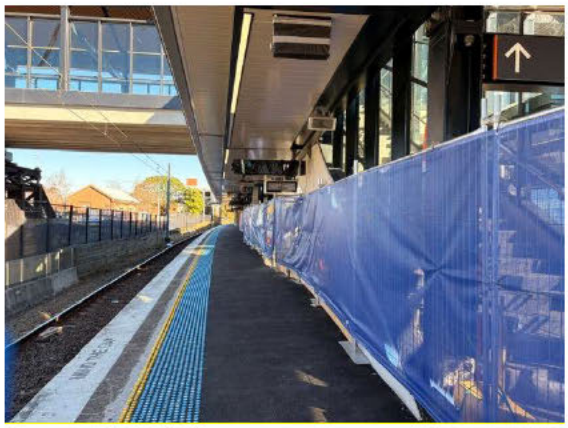


Photo 21 & 22: ATF on platform scheduled for removal during the next weekend possession.



Photo 23: Heritage listed platform building – exterior painting complete after canopy removal.

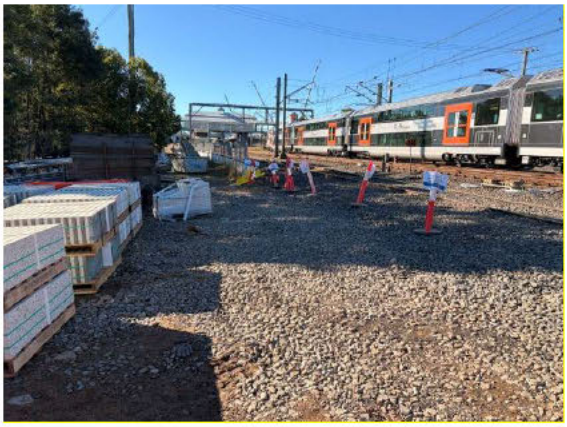








Photo 24-27: Laydown 1 – Spoil load-out almost complete and controls in place for stockpiles and tree protection.



Photo 28: The site access at Laydown 1 was swept and stabilised and ERSED controls were in place as required.

Independent Environmental Audit Report

Sydney Metro

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

Attachment 1: Independent Audit Table

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	Laing O'Rourke / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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.**	• 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 (RtS), 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	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. Refer also to the review of the Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1), SSI-10051-MOD-2, corresponding Modification Assessment Reports, as well as Consistency Assessments prepared during the audit period in the body of the audit report. SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends **Condition E4** to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends **Condition E13** to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. There were no Consistency Assessments (CAs) or Environmental Reviews (ERs) relevant to FAW_FSM prepared during the audit period.
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in **Condition A1** unless otherwise specified in, or required under, this approval.	• Refer evidence throughout this audit table	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. During the previous audit (IA9) two non-compliances were raised: • **NCR01 (C10):** There was no tree protection zone (TPZ) established around one of the trees in Laydown 1. The SM-WSA FSM Biodiversity ERAP requires "*Construction of fencing or any physical barrier between installation areas and the vegetation to be installed where required*". • **NCR02 (E109):** The CTPMP , Section 3.4 Worker parking states "*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*". 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 "*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*". The audit found there was no works zone approval in place. Refer to **Conditions C10 and E109** for more information.
A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in **Condition A1** inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in **Condition A1** inclusive, the most recent document will prevail to the extent of the inconsistency. **Note:** *For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.*	• Interview with Sydney Metro & LOR, 11/8/2026 • 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	SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends **Condition E4** to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends **Condition E13** to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. There 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.
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, 11/8/2026	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, 11/8/2026	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.	• Interview with Sydney Metro & LOR, 11/8/2026 • ER interview, 12/8/2026	C	As per conditions requiring consultation throughout this audit table, including in relation to monitoring programs and document review. Monitoring programs have been incorporated into CEMP Sub-plans are were approved by DPHI prior to construction commencement.
A7	This approval lapses five (5) years after the date on which it is granted, unless work has physically commenced on or before that date.	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1 June 2026 • Sydney Metro MCoA A35 Notification of commencement of Construction- AEW Footbridge St Marys, dated 19/5/2023 • Post Approval Form_20230519044011 (SSI-10051-PA-223), A35 Notification of commencement AEW FSM, 19/5/2023	C	Approval for SSI-10051 was granted on 23/7/2021. Notifications of commencement of Construction were submitted to DPHI (as per **Conditions A34 & A35**) for each stage. The Notification of Commencement of Construction for FSM was dated 19/5/2023 for commencement on 27/5/2023 and was within the five year commencement period.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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, 11/8/2026	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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026	NT	**Condition A10** is not applicable to AEW - Footbridge St Marys as per the Staging Report Rev13, 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 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026	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 Rev13 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 13 on 1/6/2026.
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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • 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 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13)	C	The Staging Report Rev13, dated 1/6/2026 was submitted to DPHI for information on 12/6/2026 The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B 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 13, 1 June 2026	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 Rev13 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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13) • Letter from DPHI RE: Sydney Metro Western Sydney Airport – Staging Report – Revision 13, dated 7/7/2026	C	The Staging Report Rev13, dated 1/6/2026 was submitted to DPHI for information on 12/6/2026. The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B
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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13) • Letter from DPHI RE: Sydney Metro Western Sydney Airport – Staging Report – Revision 13, dated 7/7/2026	C	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report Rev 13 of the Staging Report was updated to include the following: The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13) • Letter from DPHI RE: Sydney Metro Western Sydney Airport – Staging Report – Revision 13, dated 7/7/2026	**C**	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report Rev 13 of the Staging Report was updated to include the following: The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B Refer to Audit Table Part C for submission of CEMP and Sub-plans and timing verification.
ANCILLARY FACILITIES				
Ancillary Facilities				
A17	Ancillary facilities that are not identified by description and location in the documents listed in **Condition A1** can only be established and used in each case if: (a) they are located within or immediately adjacent to the Construction Boundary of the CSSI; and (b) they are not located next to sensitive land use(s) (including where an access road is between the facility and the receiver), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and (c) they have no impacts on Heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and (d) the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts. ***Note:*** *This condition does not apply to any ancillary facilities or work that are exempt or complying development, established before the commencement of construction under this approval or minor ancillary facilities established under* ***Condition A22****.*	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP) Rev06, Laing O'Rourke, dated 18/2/2026 • ER Endorsement of the SM-WSA, AEW, Footbridge St Marys CEMP, Rev 06, dated 10/3/2026 • 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	**NT**	The following Ancillary Facilities are listed for proposed use in Section 1.2.3 of the CEMP: • The main FSM site compound and laydown, Harris Street • Laydowns 1-5 • 2 Harris Street *It is understood that the Glossop Street Laydown is Laydown 2; Hobart Street Gate 4 is Laydown 3 & Hobart Street Gate 5 is Laydown 4. Page 72-73 of the CEMP references laydowns 1-5 being approved under the Ancillary Facilities Checklist. MAF checklists were provided as evidence. As per Section 12.8 of the CEMP, "*Should any further ancillary facilities be required LORAC will submit the necessary assessment to TfNSW and the ER. Future ancillary facilities would be approved in accordance with A17 or A22. ".* There were no FSM A17 Ancillary Facility Assessments approved during the audit period. No A17 AFs are known to have been established during the audit period. The CEMP was updated to Rev5 to change terminology from Minor Ancillary Facilities (MAFs) to Ancillary Facilities (AFs) at the request of DPHI. No ancillary facilities outside of the documents in **Condition A1** are planned to be required.

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Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
SITE ESTABLISHMENT WORK				
Site Establishment Management Plan				
A18	Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A22 and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities. The Site Establishment Management Plan must be prepared in consultation with the Relevant Council(s) and relevant government agencies. The Site Establishment Management Plan must include: (a) a description of activities to be undertaken during establishment of the ancillary facility (including scheduling and duration of work to be undertaken at the site); (b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s); (c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of site establishment work; (d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1; and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and (e) a program for monitoring the performance outcomes, including a program for construction noise monitoring, where appropriate or required. Nothing in this condition prevents the Proponent from preparing individual **Site Establishment Management Plans** for each ancillary facility.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP), Laing O'Rourke, Rev06, Laing O'Rourke, dated 18/2/2026 • FSM MAF checklist (Laydowns), approved by ER 17/11/23	NT	There were no Site Establishment Management Plans prepared for FAW_FSM under **Condition A18** during the audit period.
A19	With the exception of a **Site Establishment Management Plan** expressly nominated by the Planning Secretary to be endorsed by the **ER**, all **Site Establishment Management Plans** must be submitted to the Planning Secretary for approval one (1) month before the establishment of any ancillary facilities.	• Interview with Sydney Metro & LOR, 11/8/2026	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**.	• Interview with Sydney Metro & LOR, 11/8/2026	NT	There were no Site Establishment Management Plans prepared for FAW_FSM under **Condition A18** during the audit period.
Use of Ancillary Facilities				
A21	The use of ancillary facility for construction must not commence until the **CEMP** required by **Condition C1** relevant **CEMP Sub-plans** required by **Condition C5** and relevant **Construction Monitoring Programs** required by **Condition C13** have been approved by the Planning Secretary or endorsed by the **ER** (whichever is applicable). ***Note:*** *This condition does not apply to* ***Condition A22*** *or where the use of an ancillary facility is Low Impact Work or for Low Impact Work.*	• Interview with Sydney Metro & LOR, 11/8/2026 • 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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Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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 l ke, can be established and used where they have been assessed in the documents listed in **Condition A1** or satisfy the following criteria: (a) are located within or adjacent to the Construction Boundary; and (b) have been assessed by the **ER** to have - (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.	• Interview with Sydney Metro & LOR, 11/8/2026 • ER interview, 12/8/2026 • Site inspection, 11/8/2026 • Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) CEMP Rev06, Laing O'Rourke, dated 18/2/2026 • FSM MAF checklist (Laydowns), approved by ER, dated 17/11/23	NT	The project has determined that MAFs established to date are located in areas already assessed by the documents listed in **Condition A1** (i.e. within the project boundary and identified as indicative office and amenities locations in the EIS). Maps in the EIS, Chapter 8 Project Description (e.g. Figure 8-11) and Table 8-3 set out indicative office & amenities locations. There were no Minor Ancillary Facility Assessments conducted or approved during the audit period.
Boundary screening				
A23	Boundary screening must be erected around ancillary facilities that are adjacent to sensitive land use(s) for the duration that the ancillary facility is in use unless otherwise agreed with relevant affected residents, business operators or landowners.	• Site inspection, 11/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026	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).	• Site inspection, 11/8/2026	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 *Seeking approval from the Department for the appointment of independent experts* (DPIE, 2020) and hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	• ER interview, 12/8/2026 • 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.	• Interview with Sydney Metro & LOR, 11/8/2026	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.***	• Interview with Sydney Metro & LOR, 11/8/2026	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.	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Post Approval Form_20230321040318 (SSI-10051-PA-197), Approval of Additional ER, submitted 21/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A29	The proposed **ER** must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in **Condition A1**, and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A30	The Proponent may engage more than one **ER** for the CSSI, in which case the functions to be exercised by an **ER** under the terms of this approval may be carried out by any **ER** that is approved by the Planning Secretary for the purposes of the CSSI.	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*".
A31	The ER must meet the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).	• DPHI Independent ER Appointment Letter RE: Appointment of Alex Gale as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_ WSA, dated 9/3/2022	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*". Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_ WSA, dated 9/3/2022 includes statements and CV of ER Brett McLennan and supporting evidence of meeting the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A32	For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved **ER** must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents identified in **Conditions A10, A18, A20, C1, C5** and **C13** and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) endorse the documents before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) endorse the documents before the implementation of such documents (if those documents are only required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary / Department); (iii) provide a written statement to the Planning Secretary advising the documents have been endorsed. (e) for documents that are required to be submitted to the Planning Secretary / Department for information under (d)(ii) above, the documents must be submitted as soon as practicable to the Planning Secretary / Department after endorsement by the ER, unless otherwise agreed by the Planning Secretary; (f) regularly monitor the implementation of the documents listed in **Conditions A10, A18, A20, C1, C5** and **C13** to ensure implementation is being carried out in accordance with the document and the terms of this approval; (g) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under **Condition A36**; (h) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department; (i) consider or assess the impacts of minor ancillary facilities as required by **Condition A22**; and (j) consider any minor amendments to be made to the **Site Establishment Management Plan**, **CEMP, CEMP Sub-plans** and construction monitoring programs without increasing impacts to nearby sensitive land use(s), and are consistent with the terms of this approval and the **Site Establishment Management Plan, CEMP, CEMP Sub-plans** and construction monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; (k) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an **Environmental Representative Monthly Report** providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports". The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI or as otherwise agreed by the Planning Secretary; and (l) assess the impacts of activities as required by the **Low Impact Work** definition.	• ER interview, 12/8/2026 • Sydney Metro WSA ER Monthly Report February 2026, dated 6/3/2026 • DPHI Submission, SM WSA ER_DPHI_February 2026, lodged 5/9/2025 • Sydney Metro WSA ER Monthly Report March 2026, dated 7/4/2026 • DPHI Submission, SM WSA ER_DPHI_March 2026 Final, lodged 7/10/2025 • Sydney Metro WSA ER Monthly Report April 2026, dated 7/5/2026 • DPHI Submission, SM WSA ER_DPHI_April 2026 Final, lodged 7/11/2025 • Sydney Metro WSA ER Monthly Report May 2026, dated 5/6/2026 • DPHI Submission, SM WSA ER_DPHI_May 2026 Final, lodged 5/12/2025 • Sydney Metro WSA ER Monthly Report June 2026, dated 6/7/2026 • DPHI Submission, SM WSA ER_DPHI_June 2026 Final, lodged 15/1/2026 • Sydney Metro WSA ER Monthly Report July 2026, dated 6/2/2026 • DPHI Submission, SM WSA ER_DPHI July 2026 Final, lodged 6/2/2026 • Sydney Metro WSA FSM ER Inspection Report #59, dated 11/3/2026 • Sydney Metro WSA FSM ER Inspection Report #61, dated 15/4/2026 • Sydney Metro WSA FSM ER Inspection Report #64, dated 3/6/2026 • Sydney Metro WSA FSM ER Inspection Report #67, dated 15/7/2026 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1/6/2026 • ER Endorsement Staging Report Rev 13, dated 9/6/2026 • Sydney Metro Western Sydney Airport Advanced Enabling Works (FSM) Construction Environmental Management Plan (CEMP) Rev06, Laing O'Rourke, dated 18/2/2026 • ER Endorsement of the Sydney Metro Western Sydney Airport, Advanced and Enabling Works, Footbridge St Marys Construction Environmental Management Plan, Rev 06, dated 10/3/2026 • DPHI submission 12/3/2026 • DPHI acknowledgement letter, dated 24/3/2026	C	(a) No formal communication has been received from DPHI requiring ER response within the audit period. (b) The ER provides information to the Planning Secretary predominantly via reports and meetings. ER Monthly Reports include relevant information on incidents, non-compliances and complaints. An informal monthly meeting with DPHI is held to discuss environmental issues and concerns. Monthly meetings with DPHI and Sydney Metro are also attended by the ER, and includes an agenda and meeting minutes. (c) ER recommendations are included in ER Inspection Reports, which are in the form of Corrective Actions and Improvement Opportunities related to environmental management. Fortnightly project meetings are attended by the ER with Sydney Metro & LORAC. The ER also holds informal meetings with LORAC fortnightly after ER inspections, and chaired by TfNSW. Minutes are distributed by TfNSW. (d) Documents reviewed by the ER during the audit period are documented in the ER Monthly Reports. (e) Submission of documents to DPHI after ER endorsement was verified throughout the audit. (f) The implementation of the documents listed in **Conditions A10, C1 and C13** is predominantly monitored during ER site inspections, which are generally fortnightly (though may be more frequent dependent on the scope of work and associated risk). The implementation of **Condition A18** and **A20** has not been relevant during the audit period. (g) There has been no request made by the Planning Secretary to the ER to assist with audits during the audit period. (h) There has been no request made by the Planning Secretary to the ER to assist in the resolution of community complaints during the audit period. (i) Ancillary facilities in use were approved by the ER using a checklist. (j) Minor amendments to the documents listed in **Condition A32(j)** have been approved by the ER as required. (k) ER Monthly reports are prepared and submitted to DPHI as required. (l) No low impact works have been assessed by the ER during the audit period. ER inspections are conducted fortnightly. Issues identified by the ER have included: Litter management; Mud tracking from the laydown; Controls for concrete cutting and washout, Waste management, Erosion and sediment control (particularly at the Harris Street access). 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. Three representatives from the DPHI compliance team attended the site for an inspection on 12/8/2026. No issues were raised by the Department. Evidence of close-out of each issue raised by the ER was sighted by the auditor and closed-out in Evotix. Issues identified in ER inspection reports had been rectified at the time of the audit site inspection. The Final E57 Consultation report was not submitted to the ER prior to works commencing. Refer to **Condition E57** for more information. During the WE04 possession an exceedance was identified during noise monitoring, but was not attr buted to the project. ER endorsement of the CEMP Rev06 was conducted during the IA10 audit period to incorporate changes to the Staging Report Rev12.
A33	The Proponent must provide the **ER** with all documentation requested by the **ER** in order for the ER to perform their functions specified in **Condition A32** (including preparation of the **ER** monthly report), as well as: (a) the **Complaints Register** (to be provided on a weekly basis or as requested); and (b) a copy of any assessment carried out by the Proponent of whether proposed work is consistent with the approval (which must be provided to the ER before the commencement of the subject work).	• ER interview, 12/8/2026	C	The ER advised all required information has been provided to them by the Proponent in order for them to undertake their duty, including OOHW permits, Noise monitoring results, Close-out of actions, E57 reports, Complaints reports (weekly or in the event of a complaint) and monthly complaints summaries.
NOTIFICATION OF COMMENCEMENT				
A34	The Department, and relevant Councils must be notified in writing of the date of commencement of construction at least seven (7) days before the commencement of construction.	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1/6/2026 • MCoA A35 Notification of commencement of Construction- AEW Footbridge St Marys, dated 19/5/2023 • Post Approval Form_20230519044011 (SSI-10051-PA-223), A35 Notification of commencement AEW FSM, 19/5/2023	C	Notification of commencement of Construction for FSM was submitted to DPHI on 19/5/2023 for commencement date 27/5/2023, more than 7 days prior to commencement of Construction.
A35	If construction of the CSSI is to be staged, the Department, Liverpool City Council and Penrith City Council must be notified in writing at least seven (7) days before the commencement of each stage, of the date of the commencement of that stage.	• Email to Liverpool City Council RE: Notification of Commencement FSM (CoA A35), dated 19/5/2023 • Email to Penrith City Council RE: Notification of Commencement FSM (CoA A35), dated 19/5/2023	C	Notification of commencement of Construction for FSM was submitted to Liverpool City Council and Penrith City Council on 19/5/2023 for commencement date 27/5/2023, more than 7 days prior to commencement of Construction.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
INDEPENDENT ENVIRONMENTAL AUDIT				
A36	**Independent Audits** of the CSSI must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020).	• DPHI Letter, Sydney Metro Western Sydney Airport – Auditor Nomination A38, Ref: SSI-10051-PA-740, dated 8/7/2026	C	This audit (FAW_FSM IA10 SSI-10051, dated 11/8/2026) 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 IA10 SSI-10051, dated 11/8/2026) • 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 – Auditor Nomination A38, Ref: SSI-10051-PA-740, dated 8/7/2026	C	DPHI Letter approves the appointment of Ms Josephine Heltborg as Lead Auditor to conduct the 10th Construction phase Independent Audit (IA10) 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 IA10 SSI-10051, dated 11/8/2026) • DPHI Letter, Sydney Metro Western Sydney Airport – Auditor Nomination A38, Ref: SSI-10051-PA-740, dated 8/7/2026	C	This audit (FAW_FSM IA10 SSI-10051, dated 11/8/2026) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with **Condition A39** for FSM IA10 will be verified during the 11th SM-WSA Audit (IA11).
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 *Independent Audit Post Approval Requirements* (DPIE, 2020) unless otherwise agreed by the Planning Secretary. .	• This audit (FAW_FSM IA10 SSI-10051, dated 11/8/2026) • SSI-10051, Independent Audit No.5 – Audit Report (SSTOM), Morasey, February 2026 (WSA IEA Independent Audit No. 9 (IA9), 9/2/2026 • SM - WSA Independent Audit No.9 – Combined Response to Findings, undated • Evidence of submission of SM-WSA Submission of Independent Audit Report #5 & #9 to DPHI, 2/4/2026 (SSI-10051-PA-708)	C	This audit (FAW_FSM IA10 SSI-10051, dated 11/8/2026) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with **Condition A40** for IA10 will be verified during the 11th SM-WSA Audit (IA11). The IA9 FSM Audit Report (SM-WSA Audit Report), including the Proponent's response to audit findings, was submitted to the Planning Secretary on 2/4/2026, within two months of the IA9 site inspection on 25/2/2026.
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, 11/8/2026 • Site inspection, 11/8/2026 • LOR Environmental Incident Register	NT	No incidents triggering notification to DPHI occurred during the audit period. There were no Class 3 (minor) environmental incident reported during the audit period.
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 13, 1 June 2026	NT	**Condition A42** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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, 11/8/2026	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, 11/8/2026 • Site inspection, 11/8/2026 • Environmental incident & non-compliance notification report, EVT-0002256, dated 4/5/2026 • NC notification to DPHI, dated 8/5/2026	C	There was one Non-Compliance (NCs) raised for FAW_FSM during the audit period: • **NC01 (E57):** CoA E57 states "*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 prior to the out-of-hours work commencing on request*." The draft E57 report was sent to the ER on the 28/4/2026 for review with works commencing on the 02/05/2026. The final E57 report was provided to the ER for information, 2 days post works commencing which is inconsistent with what the timing outlined within the Planning Approval. Refer to **Condition E57** for more information.
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. ***Note:*** *A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.*	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • Environmental incident & non-compliance notification report, EVT-0002256, dated 4/5/2026	C	The Environmental incident & non-compliance notification report, EVT-0002256, dated 4/5/2026 included the details required by **Condition A45**.
IDENTIFICATION OF WORKFORCE				
A46	All Heavy Vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and application number to enable immediate identification by a person viewing the Heavy Vehicle standing 20 metres away.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026	NT	There was no spoil haulage observed at the time of the audit site inspection.
A47	The CSSI name, application number, telephone number, postal address and email address required under **Condition B3** must be available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under **Condition B11.**	• Site inspection, 11/8/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/	C	During the site inspection for IA10 signage observed was deemed to be compliant.

Item	
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Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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	The **Overarching Community Communication Strategy** as provided in the documents listed in **Condition A1**, or updated Strategy must be implemented for the duration of the work. Should the **Overarching Community Communication Strategy** be updated, a copy must be provided to the Planning Secretary for information.	• SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 • Post Approval submission form (PA-465) to DPHI, WSA OCCS Rev 5, dated 12/8/2024 • DPIE Letter to Sydney Metro RE: Receipt of SM-WSA OCCS Rev 5, dated 20/8/2024 • Interview with Sydney Metro & LOR, 11/8/2026 • FSM Complaints Register February-August 2026	C	The Community Communication Strategy (CCS) is a Sydney Metro document that sets out the mechanisms for which communication between the community and key stakeholders will be carried out. The CCS addresses who (the Proponent, Independent Appointments and/or construction contractor) will engage with the community, relevant councils and agencies, how they will engage and the timing of engagements. Submission to and receipt from DPHI sighted for updated OCCS Rev5, dated 31/7/2024. During IA6, the main comms activities were the issue of monthly notifications and respite for weekend out of hours works.
COMPLAINTS MANAGEMENT SYSTEM				
B2	A **Complaints Management System** must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026 • SM-WSA Cumulative Impact Meeting Minutes #024 18/2/2026 • SM-WSA Cumulative Impact Meeting Minutes #025 18/3/2026 • SM-WSA Cumulative Impact Meeting Minutes #026 15/4/2026 • SM-WSA Cumulative Impact Meeting Minutes #027 20/5/2026 • SM-WSA Cumulative Impact Meeting Minutes #028 17/6/2026 • SM-WSA Cumulative Impact Meeting Minutes #029 15/7/2026	C	Complaints are recorded in Consultation Manager (CM), a TfNSW database and a Community Consultation Manager is appointed for the project. There have been no complaints received in relation to the project. A Weekly Complaints Report is distributed to DPHI and the ER if required, though there have been no complaints for FSM. The ER Project Monthly Report summarises complaints attributed to the project for the month. Potential exists for cumulative impacts with SSTOM at St Marys Station. Cumulative impacts from interfaces and other nearby construction sites have been managed through monthly Cumulative Impact Meetings. Recent meeting minutes were provided as evidence and included attendees from Sydney Metro, SSTOM and FAW_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 issued with cumulative impacts noted for discussion during the audit or observed on site.
B3	The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction: (a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026	C	(a) A project 1800 number (1800 717 703) has been established (b) Project postal address: Sydney Metro, PO Box K659, Haymarket NSW 1240 (c) FSM uses SMWSA contacts for community enquiries and complaints. Information is included in monthly notifications and all other correspondence. Evidence sighted. (d) A mediation system has been established (refer B8-B10) The above information is available on the project website, on shadecloth around construction sites, and is included in community notifications.
B4	A **Complaints Register** must be maintained recording information on all complaints received about the CSSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: (a) number of complaints received; (b) date and time of the complaint; (c) number of people (in the household) affected in relation to a complaint, if relevant; (d) method by which the complaint was made; (e) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (f) issue of the complaint; (g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (h) if no action was taken, the reason(s) why no action was taken.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026	C	The FSM Complaints Register for the audit period was sighted. The Complaints Register is updated as complaints are received. The Contractor provides a copy of the Complaints Register to TfNSW daily. Sydney Metro provides a copy of the Complaints Register to DPHI weekly. A copy is also provided to the ER weekly. There were no complaints received in relation to the project during the audit period.
B5	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning Industry and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement). The **Collection Statement** must be included on the Proponent or development website to make prospective complainants aware of their rights under the *Privacy and Personal Information Protection Act 1998* (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026	NT	There were no complaints received in relation to the project during the audit period.

Item	
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Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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. ***Note:*** *Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.*	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026	**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**.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026 • 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.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026 • 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.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026 • 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.	• FSM Complaints Register February-August 2026 • Interview with Sydney Metro & LOR, 11/8/2026 • 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	A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including: (a) information on the current implementation status of the CSSI; (b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval; (c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval, or links to the referenced documents where available; (d) a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website; (e) a current copy of each document required under the terms of this approval, which must be published within one (1) week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be; and (f) a copy of the audit reports required under this approval. Where the information / document relates to a particular work or is required to be implemented, it must be published before the commencement of the relevant work to which it relates or before its implementation. All information required in this condition is to be provided on the website or webpage, and easy to navigate.	• LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Document L brary: https://www.sydneymetro.info/documents • https://www.sydneymetro.info/station/st-marys-metro-station • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**C**	A project website had been established for FSM: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ Sydney Metro also maintains a project website: https://www.sydneymetro.info/documents (a) Work Updates including current and past work activity notifications were available on the Sydney Metro project website and addressed the current scope of work at the time of the audit, including out of hours works. The website includes documentation required under **Condition A1** including CEMPs, communication strategies and reports, sustainability documents etc. (b) & (c) Documents listed in **Condition A1** were available on the website: https://www.sydneymetro.info/documents, and included the EIS Chapters & Appendices, Submissions Report and overarching documents associated with the project approval, e.g. Ministers Conditions of Approval, Unexpected Contamination Finds Protocol, and WSA Staging Report Rev 13, 1/6/2026 (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.

Item	
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Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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	**Construction Environmental Management Plans (CEMPs)** and **CEMP Sub-plans** must be prepared in accordance with the **Construction Environmental Management Framework (CEMF)** included in the documents listed in **Condition A1** to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in **Condition A1** will be implemented and achieved during construction.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • ER Endorsement Staging Report V13, dated 9/6/2026 • AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • DPHI Submission of AEW Footbridge St Marys CEMP, dated 26/5/2023 • Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • SM-WSA AEW FSM DNVIS RevD ER Approval, dated 11/2/2025 • SM-WSA Environmental Impact Statement, Appendix F - Construction Environmental Management Framework (CEMF), September 2020	C	Appendix C of the Staging Report documents applicable CEMF requirements for each stage, which have been addressed in the CEMP, endorsed by the ER and approved by DPHI. The CEMP includes reference to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). Section 3.4 (f) of the SM-WSA CEMF addresses the preparation of CEMPs and requires "*The Principal Contractor CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the contract documentation and this Construction Environmental Management Framework*". Section 12.2 (a)(viii) of the CEMF 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*". An annual review of the CEMP was undertaken on 18/2/2026 and included updates to address changes to the Staging Report.
C2	With the exception of any **CEMPs** expressly nominated by the Planning Secretary to be endorsed by the **ER**, all **CEMPs** must be submitted to the Planning Secretary for approval. ***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****.*	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • 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 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026	C	The WSA FSM CEMP & Sub-plans were endorsed by the ER in a letter dated 25/5/2023. Construction for FSM commenced on 27/5/2023, after ER approval.
C3	The **CEMP(s)** not requiring the Planning Secretary's approval must be submitted to the **ER** for endorsement no later than one (1) month before the commencement of construction or where instruction is staged no later than one (1) month before the commencement of that stage. That **CEMP** must obtain the endorsement of the **ER** as being consistent with the conditions of this approval and all undertakings made in the documents listed in **Condition A1.**	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • 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	The WSA FSM CEMP & Sub-plans were: • Endorsed by the ER on 25/5/2023 • Submitted to DPHI on 26/5/2023 • Construction for FSM commenced on 27/5/2023, after ER approval. Notification of commencement of construction was submitted to DPHI (as per Conditions A34 & A35) for FSM. Commencement of Construction for FSM was on 19/5/2023 for commencement date 27/5/2023. The submission of CEMP & Sub-plans to the ER and compliance with **Condition C3** was assessed during a previous audit.
C4	Any **CEMP** to be approved by the Planning Secretary must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	• AEW Footbridge St Marys CEMP, Rev 01, dated 15/5/2023 • SM-WSA AEW FSM CEMP Rev01 ER Endorsement, dated 25/5/2023 • Post Approval Form_20230526032825 (SSI-10051-PA-229), SSI10051-SM-WSA AEW FSM CEMP Rev01	C	The WSA FSM CEMP Rev 01 was: • Endorsed by the ER on 25/5/2023 • Submitted to DPHI on 26/5/2023 • Construction for FSM commenced on 27/5/2023 The submission of CEMP & Sub-plans to the ER and compliance with **Condition C4** was assessed during a previous audit.
C5	Of the CEMP Sub-plans required under **Condition C1,** the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of issues raised by a government agency during consultation (as required by Condition A6) must be provided with the relevant CEMP Sub-plan when submitted to the Planning Secretary / ER (whichever is applicable). Where a government agency(is) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why. **Required CEMP Sub-plan** / **Relevant government agencies to be consulted for each CEMP Sub-plan** (a) Noise and vibration — Relevant Councils and WaterNSW (in relation to its assets) (b) Flora and fauna — DPIE EES, DPI Fisheries, and Relevant Councils (c) Soil and Water — DPI Fisheries, and Relevant Councils (d) Non-Aboriginal heritage — Relevant Councils, WaterNSW and Heritage NSW	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • 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 CEMP Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	C	Partially Applicable as per the table in Appendix B of the Staging Report Rev 13, 1/6/2026. Appendix B of the Staging Report Rev 13 states "*risks will be managed in accordance with Table 4-1*". Table 4-1 of the Staging Report lists the following Sub-plans as applicable to **FAW - Footbridge St Marys**: a) Noise and Vibration Management - CEMP Procedure b) Non-Aboriginal Heritage Sub-plan - CEMP c) Aboriginal Cultural Heritage Management Plan d) Flora and Fauna / Biodiversity - CEMP e) Visual Amenity - CEMP f) Soil and Water (including monitoring program) - CEMP g) Air Quality (including monitoring program) - CEMP h) Waste (and Recycling) - CEMP i) Workforce Development Plan The details of agency consultation are included in the CEMP. Consultation with agencies, and the approval of the original 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. The submission of CEMP & Sub-plans to the ER and compliance with **Condition C5** was assessed during a previous audit.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	Laing O'Rourke / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • 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 CEMP Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • 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.	• 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026	**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.	• 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026	**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.	• 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026	**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.	• 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • SM-WSA AEW FSM Biodiversity ERAP (CEMP, Attachment A)	**C**	DPHI approval of the original WSA FSM CEMP & Sub-plans was not within the current audit period. Compliance with **Condition C10** was verified during a previous audit. The WSA 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. Actions raised during the previous audit in relation to a NC (related to tree protection) and Observation (related to waste management) raised against **Condition C10** were verified to be closed-out during IA6. Refer to the body of the Audit Report for details. **Observation 1**: ***Non-compatible storage of hazardous chemicals (Flammable Liquids stored in a cabinet with Flammable Gases) was identified in the LOR site compound.*** **Recommendation**: ***Remove Flammable Gases (aerosols) from the Flammable Liquid cabinet and store in a designated, ventilated Flammable Gas cage.*** **Observation 2:** ***A small area of stabilised earth was observed in the location of the form water tanks in the LOR site compound. ERSED controls were not in place.*** **Recommendation**: ***Stabilise the area and/or apply ERSED controls to reduce the risk of sediment run-off.***
C11	In addition to the relevant requirements of the **CEMF**, the **Flora and Fauna CEMP Sub-plan** must include but not be limited to: (a) details of how the requirements of **Conditions E11** will be met; (b) details of a dewatering plan of farm dams including: (i) supervision of dewatering by a suitably qualified ecologist; (ii) a methodology for the transfer of native fauna species known to inhabit and/or use the dam; (iii) the location and suitability of the proposed relocation sites; and (iv) any potential impacts of relocating the fauna to the relocation sites; (c) protocols for incidental finds of threatened species and ecological communities within the construction boundary.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition C11** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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**.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition C12** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
CONSTRUCTION MONITORING PROGRAMS				
C13	The following **Construction Monitoring Programs** must be prepared in consultation with the relevant government agencies (as required by **Condition A6**) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in **Condition A1** or in the **CEMP**. Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / **ER** (whichever is applicable) justification as to why. **Required Construction Monitoring Programs** / **Relevant government agencies to be consulted for each Construction Monitoring Program** (a) Noise and vibration — Relevant Councils and WaterNSW (in relation to its assets) (b) Surface water quality — DPIE Water, DPI Fisheries, and Relevant Councils (c) Groundwater — DPIE Water (d) Air Quality — Relevant Councils	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025 • LOR Water Discharge Log February-August 2026 • Water Discharge or Reuse Approval Form F1.684695, dated 19/3/2026. *Water from OSD tanks was moved to IBC's within site compound. The pH was 9.7.* • Water Discharge or Reuse Approval Form F1.694930, dated 6/5/2026 • Water Discharge or Reuse Approval Form F1.708076, dated 3/7/2026. *Water from the Northern plaza hardscaping excavation was moved to an IBC. The pH was 10.54.* • Water Discharge or Reuse Approval Form F1.709490, dated 10/7/2026	**NT**	Partially Applicable as per the table in Appendix B of the Staging Report Rev 13, 1/6/2026. Appendix B of the Staging Report Rev 13 states "*risks will be managed in accordance with Table 4-3*". Table 4-3 of the Staging Report lists the following Sub-plans as applicable to **FAW_FSM**: a) Noise and Vibration Management - CEMP Procedure b) Non-Aboriginal Heritage Sub-plan - CEMP c) Aboriginal Cultural Heritage Management Plan d) Flora and Fauna / Biodiversity - CEMP e) Visual Amenity - CEMP f) Soil and Water (including monitoring program) - CEMP g) Air Quality (including monitoring program) - CEMP h) Waste (and Recycling) - CEMP i) Workforce Development Plan Auditees advised "*CoA C21 is managed in accordance with Table-4-3 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 TfNSW and the ER upon request. The OOHW data is provided to TfNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the planning secretary as required*". Compliance with **Condition C13** was verified during IA1. The details of agency consultation are included in the CEMP. Consultation with agencies, and the approval of the original AEW CEMP & Procedures was not triggered within the IA10 audit period. The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023. Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows: • **Noise:** Attended noise monitoring during high-risk activities, Out of Hours Works and in response to complaints, or as required under the SM OOHW Protocol • **Vibration:** Attended vibration monitoring as required or as required under the SM OOHW Protocol and CSSI for works within heritage curtilage • **Water quality:** Dewatering • **Air quality:** Visual inspections to make sure that dust impacts are minimised to the greatest extent practicable. Relevant environmental monitoring information to manage th relatively low risks 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.
C14	Each **Construction Monitoring Program** must provide: (a) details of baseline data available including the period of baseline monitoring; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the project to be undertaken; (d) the parameters of the project to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicated unacceptable project impacts; (j) a consideration of SMART principles; (k) any consultation to be undertaken in relation to the monitoring programs; and (l) any specific requirements as required by **Conditions C15 to C16**.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • 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 TfNSW and the ER upon request. The OOHW data is provided to TfNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the Planning Secretary as required. The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023.
C15	The **Noise and Vibration Construction Monitoring Program** must include: (a) noise and vibration monitoring at representative residential and other locations (including at the worst- affected residences), subject to property owner approval, to confirm construction noise and vibration levels; (b) monitoring undertaken during the day, evening and night-time periods throughout the construction period and cover the range of activities being undertaken; (c) method and frequency for reporting monitoring results; and (d) a process to undertake real time noise and v bration monitoring. The results of the monitoring must be readily available to the construction team, the Proponent and **ER**. The Planning Secretary and EPA must be provided with access to the results on request.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • 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 TfNSW and the ER upon request. The OOHW data is provided to TfNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the Planning Secretary as required. The WSA FSM CEMP was endorsed by the ER in a letter dated 25/5/2023. Auditees reported the results of monitoring were provided to Sydney Metro and the ER as required. The Planning Secretary is not known to have requested a copy of noise or v bration monitoring results.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	Laing O'Rourke / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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 13, 1 June 2026	**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 13, 1 June 2026 • 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • 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 TfNSW and the ER upon request. The OOHW data is provided to TfNSW 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 13, 1 June 2026 • 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • 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 TfNSW and the ER upon request. The OOHW data is provided to TfNSW 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 13, 1 June 2026	**NT**	**Condition C19** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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 13, 1 June 2026 • 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 Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • 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 TfNSW 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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • AEW Footbridge St Marys Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • 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 February-August 2026 • FSM Noise Verification Record Sheets WE48 Possession: F1.713191, F1.713230, F1.713246, F1.713255, F1.713484, F1.713488, F1.713496, F1.713502, F1.713504 • FSM Noise Verification Record Sheets WE04 Possession: F1.713548, F1.713570, F1.713576, F1.713584, F1.713586 • FSM Noise Verification Record Sheets WE03 Possession: F1.713507, F1.713512, F1.713524, F1.713528, F1.713532, F1.713539 • LOR Water Discharge Log February-August 2026 • Water Discharge or Reuse Approval Form F1.684695, dated 19/3/2026. *Water from OSD tanks was moved to IBC's within site compound. The pH was 9.7.* • Water Discharge or Reuse Approval Form F1.694930, dated 6/5/2026 • Water Discharge or Reuse Approval Form F1.708076, dated 3/7/2026. *Water from the Northern plaza hardscaping excavation was moved to an IBC. The pH was 10.54.* • Water Discharge or Reuse Approval Form F1.709490, dated 10/7/2026 • LOR Environmental Inspection Reports, dated 5.3.2026, 17.4.2026, 7.5.2025, 30.6.2026, 31.7.2026	NT	Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows: • **Noise:** Attended noise monitoring during high-risk activities, Out of Hours Works and in response to complaints, or as required under the SM OOHW Protocol • **Vibration:** Attended vibration monitoring as required or as required under the SM OOHW Protocol and CSSI for works within heritage curtilage • **Water quality:** Dewatering • **Air quality:** Visual inspections to make sure that dust impacts are minimised to the greatest extent practicable. Relevant environmental monitoring information to manage relatively low risk of FSM works is included within the CEMP and attached ERAPs Attachment F. In addition to the LORAC CEMP, noise and vibration monitoring will be undertaken in accordance with the Sydney Metro Out of Hours Works Protocol and Sydney Metro Construction Noise and V bration Strategy. The FSM Noise Monitoring Register and examples of attended noise monitoring results were provided as evidence during the audit. The Noise Monitoring Register included data from February-August 2026. The FSM Water Discharge Register and examples of water discharge monitoring results were provided as evidence during the audit. The Water Discharge Register included data from February - August 2026 and includes the approximate volume and destination of pumped water. Water was discharged to IBCs from excavations and OSDs during the IA10 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 IA10 audit period. It is noted that the pH was above the discharge criteria in two of the four permits provided for review during IA6, but no water was discharged to land. Some water was disposed offsite due to high sediment load. Visual monitoring for dust is conducted daily and recorded in LOR Weekly Environmental Inspection Checklists. Examples of these checklists were provided as evidence during the audit. Auditees advised CoA C21 is managed in accordance with Table-4-3 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 TfNSW and the ER upon request. The OOHW data is provided to TfNSW and the ER following possessions. Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the Planning Secretary as required.
C22	The results of the **Construction Monitoring Programs** must be submitted to the Planning Secretary, **ER** and relevant regulatory agencies, for information in the form of a **Construction Monitoring Report** at the frequency identified in the relevant **Construction Monitoring Program**. ***Note:*** *Where a relevant* ***CEMP Sub-plan*** *exists, the relevant* ***Construction Monitoring Program*** *may be incorporated into that* ***CEMP Sub-plan***.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • AEW Footbridge St Marys Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Environmental monitoring requirements are set out in Section 17.1.2 of the CEMP. Table 12 summarises the monitoring approach as follows: • **Noise:** Attended noise monitoring during high-risk activities, Out of Hours Works and in response to complaints, or as required under the SM OOHW Protocol • **Vibration:** Attended vibration monitoring as required or as required under the SM OOHW Protocol and CSSI for works within heritage curtilage • **Water quality:** Dewatering • **Air quality:** Visual inspections to make sure that dust impacts are minimised to the greatest extent practicable. Relevant environmental monitoring information to manage relatively low risk of FSM works is included within the CEMP and attached ERAPs Attachment F). In addition to the LORAC CEMP, noise and vibration monitoring will be undertaken in accordance with the Sydney Metro Out of Hours Works Protocol and Sydney Metro Construction Noise and Vibration Strategy. Auditees advised CoA C21 is managed in accordance with Table-4-3 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 TfNSW and the ER upon request. The OOHW data is provided to TfNSW and the ER following possessions (within 5 days). Monitoring registers are kept up to date and available upon request. Sydney Metro will submit data to the Planning Secretary as required. No monitoring data has been requested by the Department during the audit period.

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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.	• Site inspection, 11/8/2026 • Interview with Auditees, 11/8/2026	**C**	Dust suppression measures were observed during the site inspection including hoses, stockpiles covered at the end of shift, and street sweepers during spoil load out as required. Site accesses were stabilised to ancillary facilities and compound areas. Geofabric is used to cover disturbed 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.
BIODIVERSITY AND TREES				
Biodiversity Credits				
E2	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E3	Impacts to plant community types must not exceed those identified in the documents listed in **Condition A1**, unless otherwise approved by the Planning Secretary. In requesting the Planning Secretary's approval, an assessment of the additional impact(s) to plant community types and an updated ecosystem and / or species credit requirement under Condition E4 below, if required, must be provided.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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-l ke) must be retired. ***Note:*** *Credits have been calculated using the Biodiversity Assessment Method.* **Table 3: Ecosystem credits** **Plant Community Type (PCT) ID and name** / **Number of Credits** 724: Broad-leaved Ironbark – Grey Box – Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion — 246 835: Forest Red Gum – Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion — 217 849: Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion — 202 204 1800: Swamp Oak open forest on riverflats of Cumberland Plain and Hunter Valley — 151 **TOTAL** — 848 848 **Table 4: Species credits required** **Species** / **Number of Credits** ~~Acacia bynoeana (Bynoe's Wattle)~~ — ~~21~~ ~~Acacia pubescens (Downy Wattle)~~ — ~~64~~ *Allocasuarina glareicola* — 47 ~~Cynanchum elegans (White-flowered Wax Plant)~~ — ~~15~~ *Dillwynia tenuifolia* — 21 72 Grevillea juniperina subsp. juniperina (Juniper-leaved Grevillea) — 67 453 Grevillea parviflora subsp. parviflora (Small-flower Grevillea) — 32 ~~Microtis angusta subsp. angusta (Endangered population Meadow Onion in the Sydney Basin bioregion)~~ — ~~132~~ ~~Microtis angusta~~ — ~~42~~ ~~Persoonia nutans~~ — ~~18~~ ~~Persoonia pinifolia (Pine-leaved Geebung)~~ — ~~23~~ *Pultenaea parviflora* — 10 31 Meridolum corneovirens — 198 Cumberland Plain Land Snail *Myotis Macropus* (Southern Myotis) — 292 **TOTAL SPECIES CREDITS** — ~~339 1,111~~	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E5	The requirement to retire like-for-like ecosystem credits and species credits in **Condition E4** may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E6	Where evidence of compliance with the Ancillary rules: Reasonable steps to seek l ke-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).	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E7	Evidence of the retirement of credits in satisfaction of **Condition E4** or payment to the Biodiversity Conservation Fund in satisfaction of **Condition E5** must be provided to the Planning Secretary prior to impacts on the biodiversity values.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	**NT**	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).

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Key Fish Habitat				
E8	The Proponent must minimise impacts to Key Fish Habitat (**KFH**) as defined in *Policy and Guidelines for Fish Habitat Conservation and Management* (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 *Policy and Guidelines for Fish Habitat Conservation and Management* (DPI, 2013 update) and in consultation with DPI Fisheries.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026	NT	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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 13, 1 June 2026	NT	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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 13, 1 June 2026	NT	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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 13, 1 June 2026	NT	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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 poss ble 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 13, 1 June 2026	NT	**Condition E2** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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, 11/8/2026 • 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 for the FAW project and 16 trees to be replanted in accordance with the PUDCLP. Across all SM-WSA projects, approximately 600 trees have been removed to date. Approximately 4,500 trees are planned for replacement, exceeding the required 2:1 ratio. Revegetation and tree replacement had commenced at the time of the audit, and is required prior to the commencement of operation.

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Watercourse Crossings				
E14	The Proponent must design the watercourse crossings and the east-west regional corridor (Patons Lane) crossing to achieve the following objectives: (a) design of viaducts to retain and minimise clearing/disturbance of native vegetation and maximise native plant growth under the structures, (i) maintain and/or improve riparian/terrestrial connectivity under the viaduct and bridge structures to maximise the corridor function; (ii) maximise the viaduct and bridge structures span over the riparian corridor and/or remnant native vegetation whichever is the widest; (iii) minimise the clearing/disturbance of native vegetation and native riparian vegetation; and (iv) maximise light and moisture penetration under the viaduct and bridge structures to support native plant growth; (b) design of culverts and other crossings incorporate the following into the design to provide for movement of aquatic and terrestrial fauna, (i) elevated "dry" cells to encourage terrestrial movement, and recessed "wet" cells to facilitate the movement of aquatic fauna; (ii) maximise light penetration into the culvert structures; (iii) a naturalised base along the bed of the culvert; and 'fauna furniture' (such as rocks, logs, ropes and ledges) to facilitate fauna movement to maintain connectivity and provide fauna passage; (c) design of scour protection using natural solutions such as the revegetation of banks with local native species; and (d) details of remnant native vegetation including riparian vegetation. The Proponent must consult with DPIE EES, DPI Fisheries and engage suitably qualified experts in fauna crossing design to achieve the outcomes of this condition. ***Note:*** *These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under Condition E79.*	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition E14** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
FLOODING				
E15	The CSSI must be designed and constructed with the objective of not exceeding the flood impacts presented in the documents listed in **Condition A1** or the flood impact criteria in **Table 5**, whichever is greater, within and in the vicinity of the CSSI for all flood events up to and including the one (1) per cent Annual Exceedance Probability (AEP) flood event. **Table 5: Flood Impact Criteria** **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 Land zoned as rural, primary production, environment or public recreation — Maximum 100 mm **Velocity** — 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 the same outcome must be incorporated into the detailed design of the CSSI.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • SM-WSA AEW FSM CEMP Rev06 ER Endorsement, dated 10/3/2026 • PUDCLP Stage 2	NT	FSM is not in a flood prone area and therefore the flood impact criteria is not applicable - as per Attachment P Compliance Matrix in the FSM CEMP and as per assessments made in previous audit reports. **NB:** *Morasey have been engaged as Independent Auditors for the project and are not qualified or suitably experienced to comment on the applicability of flood-related conditions. This advice should be sought from appropriately qualified and experienced flood engineers or other specialists in this field.*
E16	Updated modelling that incorporates these measures and is calbrated and validated with consideration of the results of the Wianamatta-South Creek Catchment Flood Assessment prepared by Infrastructure NSW as part of Stage 2 of the South Creek Sector Review must be prepared by a suitably qualified flood consultant. The modelling must identify changes in post-development flood behaviour including cumulative flood impacts associated with Western Sydney International Airport and the M12, where this information is available, prior to detailed design being finalised.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition E16** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).

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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 13, 1/6/2026	NT	**Condition E17** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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, 13, 1/6/2026	NT	**Condition E18** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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, 11/8/2026 • 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 • Emails RE: FW: [GML ref 25-0327] St Marys Station Footbridge (FSM) - Platform 3/4 canopy removal - Heritage paint scheme and repainting - Recommendation: Option 2, dated 6/5/2026-11/6/2026	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. During the IA6 audit period restoration / rectification works were undertaken to the platform building in consultation with the GML built heritage consultant and Sydney Metro heritage team. Works were limited to exterior painting of the building where the canopy had been removed, and painting of the remaining canopy. Correspondence between the contractor, TfNSW, Sydney Metro heritage specialist and GML Heritage was sighted as evidence. 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, 11/8/2026	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 j b 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, 11/8/2026 • 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 j b 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, 11/8/2026 • 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 l kely 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 *Criteria for Assessment of Excavation Director* (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, 11/8/2026 • 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. GML has been engaged to undertake archaeological monitoring during works on the station platform, e.g. during resurfacing. Archaeological monitoring was undertaken (but not limited to) 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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Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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 *How to Prepare Archival Records of Heritage Items* (NSW Heritage Office, 1998) and *Photographic Recording of Heritage Items Using Film or Digital Capture* (NSW Heritage Office, 2006).	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 descr bed in the documents listed in Condition A1 in relation to heritage items. Copies of the **Archival Recording Report** must also be provided to relevant local historical societies.	• Interview with Sydney Metro & LOR, 11/8/2026	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.	• Interview with Sydney Metro & LOR, 11/8/2026	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 l braries.	• Interview with Sydney Metro & LOR, 11/8/2026	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.	• Interview with Sydney Metro & LOR, 11/8/2026 • SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 • Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023	NT	No AHIMS or other cultural heritage sites or artefacts are known to occur within the project boundary. No unexpected finds of Aboriginal cultural heritage are known to have occurred.
E29	The Registered Aboriginal Parties (**RAPs**) must be kept regularly informed about the CSSI. The **RAPs** must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the CSSI throughout construction.	• Interview with Sydney Metro & LOR, 11/8/2026 • SM-WSA Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 • Attachment R of the LOR FSM CEMP: Heritage Management Procedure, Artefact, May 2023 • Quarterly Registered Aboriginal Party (RAP) update, November 2025 • Six-Monthly Registered Aboriginal Party (RAP) update, July 2026	C	Evidence to support ongoing consultation with Registered Aboriginal Parties (RAPs) was provided via the Quarterly or Half Yearly Registered Aboriginal Party (RAP) updates. RAP updates were sighted for November 2025 and July 2026, which included a newsletter. The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil **Condition E32**. The report was prepared by AECOM, in consultation with RAPs. The final report was distributed to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. Section 2 of the report provides an overview of the Aboriginal community consultation undertaken to inform the preparation of the project's original and revised ACHARs, as well as the off-airport ACHMP. RAP participation in the SM-WSA salvage program is also detailed. No Aboriginal cultural heritage test and salvage excavations have been undertaken for SSTOM.
E30	The **Aboriginal Cultural Heritage Management Plan** included in the documents listed in **Condition A1** must be updated to include: (a) a methodology for the completion of pedestrian surveys for all areas within the project footprint yet to be surveyed; (b) procedures for undertaking further test excavation and, if necessary, salvage excavations prior to the commencement of works in areas subject to further test excavation; (c) mapping that clearly outlines all areas yet to be subject to survey, test excavations, and salvage excavations; (d) a procedure to update mapping following the completion of survey, test excavations, and salvage excavations that detail the archaeological works conducted across the project footprint; (e) a procedure for updating the predictive model following the identification of new Aboriginal heritage items; and (f) a procedure to report and update the effectiveness of the following the completion of survey, test excavation activities or significant artefact finds. The updated Plan must be submitted to the Planning Secretary for information prior to works in areas identified for further test excavations. ***Note**: Salvage excavations in the areas identified for salvage in documents in Condition A1, may occur prior to additional test excavations occurring.*	• Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro WSA Staging Report Rev 13, 1/6/2026 • Quarterly Registered Aboriginal Party (RAP) update, November 2025 • Six-Monthly Registered Aboriginal Party (RAP) update, July 2026	NT	**Condition E30** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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.	• Interview with Sydney Metro & LOR, 11/8/2026	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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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 13, 1/6/2026	NT	**Condition E32** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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, 11/8/2026	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, 11/8/2026 • 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, 11/8/2026 • 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, 11/8/2026 • 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 • Archaeologist monitoring record, note dated 6/9/2025 • GML Heritage Memo, St Marys Station—Unexpected Heritage Finds (UHF01–32), dated 26/2/2026 & 4/6/2026 • Unexpected heritage find recording form UHF33, Harris Street footpath works, dated 4/6/2026	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. A cast iron spring valve hydrant (UHF33) was exposed during footpath resurfacing works on Harris Street (2 June 2026) and was inspected and recorded by an archaeologist on Thursday 4 June 2026. GML were called to investigate and determined the item did not meet the threshold for significance. WE34 - UHF8 - Additional remnants were identified on the platform during WE34 but did not meet the threshold for significance..

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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**.	• Interview with Sydney Metro & LOR, 11/8/2026 • ER interview 12/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 & Attachment F Environmental Control Procedures • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	C	The FAW_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. A DNVIS has been prepared for the project site to predict the impact of project activities on nearby receivers, including noise and v bration sensitive receivers. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs). The DNVIS is provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Refer to **Condition E47** for further discussion of the assessment of OOHW and the DNVIS process.
Construction Hours				
E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 1:00pm Saturdays; and (c) at no time on Sundays or public holidays.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	C	Construction hours are documented in the FSM CEMP and the DNVIS. The DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval and recommends whether the proposed works can be managed to comply with SSI 10051. There were no known unapproved OOHW known to have been conducted during the audit period.
Highly Noise Intensive Work				
E39	Except as permitted by an EPL or approved in accordance with the Out-of-Hours Works Protocol required by **Condition E42**, highly noise intensive work that result in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one (1) hour between ceasing and recommencing any of the work.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026	NT	Auditees advised there have been no highly noise intensive works conducted for FAW_FSM to date.
E40	This approval does not permit blasting.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026	NT	No blasting is known to have been undertaken for the project.

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Variation to Work Hours				
E41	Notwithstanding **Conditions E38 and E39** work may be undertaken outside the hours specified in the following circumstances: (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or (b) Low impact, including: (i) construction that causes LAeq(15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and • no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and (ii) construction that causes: • continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or • intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing V bration: a technical guideline (DEC, 2006); or (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by **Condition E42**; or (iii) negotiated agreements with directly affected residents and sensitive land user(s); or (d) By Prescribed Activity, including: (i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunnelling) are permitted 24 hours a day, seven days a week; or (ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or (iii) delivery of material that is required to be delivered outside of standard construction hours in Condition E38 to directly support tunnelling activities, except between the hours 10:00 pm and 7:00 am to / from the Orchard Hills ancillary facility; or (iv) haulage of spoil generated through tunnelling is permitted 24 hours per day, seven days per week except between the hours of 10:00 pm and 7:00 am to / from the Orchard Hills construction site; or (v) works within an acoustic enclosure are permitted 24 hours a day, seven days a week where there is no exceedance of noise levels or intermittent v bration levels under Low impact circumstances identified in Condition E41(b), unless otherwise agreed with the Planning Secretary; or (vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week. On becoming aware of the need for emergency work in accordance with (a)(ii) above, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. The Proponent must use best endeavours to notify as soon as practicable all noise and/or v bration affected sensitive land user(s) of the likely impact and duration of those work. ***Notes:*** *1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery*	• ER interview, 12/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro WSA ER Monthly Report February 2026, dated 6/3/2026 • Sydney Metro WSA ER Monthly Report March 2026, dated 7/4/2026 • Sydney Metro WSA ER Monthly Report April 2026, dated 7/5/2026 • Sydney Metro WSA ER Monthly Report May 2026, dated 5/6/2026 • Sydney Metro WSA ER Monthly Report June 2026, dated 6/7/2026 • Sydney Metro WSA ER Monthly Report July 2026, dated 6/8/2026 • 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 February-August 2026 **WE03 Possession:** • OOHW Application Form WE03_2026_FSM_SM_WSA_OOHW_form 070 Rev01 ER Signed, 16/7/2026 • WE03 Noise Monitoring Results.xlsx • FSM WE03 works on platforms Noise Verification Record Sheets: • F1.713507 - Station Street, 8:47am, dated 28/7/2026 • F1.713512 - 75 Carinya Ave, 9:10am, dated 28/7/2026 • F1.713524 - Station Street, 9:38am, dated 28/7/2026 • F1.713528 - Station Street, 9:47am, dated 28/7/2026 • F1.713532 - 75 Carinya Ave, 9:58am, dated 28/7/2026 • F1.713539 - Station Street, 10:11am, dated 28/7/2026 **WE04 Possession:** • OOHW Application Form WE04_2026_FSM SM_WSA_OOHW_form 072 Rev00 ER Signed, 23/7/2026 • WE04 Noise Monitoring Results.xlsx • FSM WE04 works on platforms Noise Verification Record Sheets: • F1.713548 - Station Street, 2:46pm, dated 25/7/2026 • F1.713512 - 75 Carinya Ave, 8:37pm, dated 17/6/2026 • F1.713524 - Station Street, 8:56pm, dated 17/6/2026 • F1.713528 - Station Street, 12:00am, dated 18/6/2026 • F1.713532 - 75 Carinya Ave, 12:31am, dated 18/6/2026 • F1.713539 - Station Street, 3:54pm, dated 18/6/2026	C	(a) Condition E41(a) was not triggered during the audit period: (b) (i) Low Impact Works undertaken during the audit period have been assessed and approved as part of the Out of Hours Works (OOHW) Permit process. No specific stand-alone low impact works were approved OOH during the audit period. (ii) - Not triggered. (c) (i) Not triggered (no EPL). (ii) As per works conducted under the OOHW Protocol via OOHW Permits. Examples of OOHW Permits were sighted for FSM OOHW categorised under **Condition E41(c)**: • OOHW Application Form WE03_2026_FSM_SM_WSA_OOHW_form 070 Rev01 ER Signed, 16/7/2026 • OOHW Application Form WE04_2026_FSM SM_WSA_OOHW_form 072 Rev00 ER Signed, 23/7/2026 The FSM Noise Monitoring Tracker and examples of attended noise monitoring results for WE03, WE04, WE34, WE44-WE48 & MW03 & MW04 were provided as evidence during the audit. The Noise Monitoring Register included data from February-August 2026. Noise monitoring results were reported as compliant with OOHW predictions (iii) Not triggered (d) Not triggered. **Observation***: Dates and times recorded on FieldView Noise Verification Record Sheets don't align with the data in the Noise Monitoring Register. LOR has advised this is a FieldView glitch for which a solution hasn't been found to date.*

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Out-Of-Hours Work Protocol – Work not subject to an EPL				
E42	An **Out-of-Hours Work Protocol** must be prepared to identify a process for the consideration, management and approval of work (not subject to an EPL) that is outside the hours defined in **Conditions E38** and **E39**. The Protocol must be approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the **ER**. The Protocol must provide: (a) justification for why out-of-hours work need to occur; (b) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) the **ER** reviews all proposed out-of-hours activities and confirms their risk levels; (ii) low risk activities that can be approved by the **ER**; and (iii) high risk activities that are approved by the Planning Secretary; (c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria; (d) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of **Condition E56**. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land user(s) would be exposed to, including the number of noise awakening events; (e) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and (f) notification arrangements for affected receivers for all approved out-of-hours works and notification to the Planning Secretary of approved low risk out-of-hours works. This condition does not apply if the requirements of **Condition E41** are met. ***Note:*** *Out-of-hours work is any work that occurs outside the construction hours identified in* ***Condition E38*** *and* ***E39****.*	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • Sydney Metro WSA Out of Hours Work Protocol v2.0, dated 8/11/2021 • WSA-OOHW-Protocol-Approval-of-Plan-Strategy, dated 11/11/2021	C	Reference to the OOHW Protocol is included in the Footbridge St Marys CEMP. Refer previous audits for details of OOHW Protocol approval and consultation, and verification of Protocol contents in accordance with **Condition E42**.
Construction Noise Management Levels and Vibration Criteria				
E43	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria: (a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009); (b) preferred vibration criteria established using the Assessing vibration: a technical guideline (DEC, 2006) (for human exposure); (c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives" (for human exposure); (d) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and (e) the vibration limits set out in the German Standard DIN 4150-3: Structural Vibration- effects of vibration on structures (for structural damage). Any work identified as exceeding the noise management levels and / or vibration criteria must be managed in accordance with the **Noise and Vibration CEMP Sub-plan**. ***Note:*** *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.*	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • FSM Noise Monitoring Register February-August 2026 • FSM Noise Verification Record Sheets WE48 Possession: F1.713191, F1.713230, F1.713246, F1.713255, F1.713484, F1.713488, F1.713496, F1.713502, F1.713504 • FSM Noise Verification Record Sheets WE04 Possession: F1.713548, F1.713570, F1.713576, F1.713584, F1.713586 • FSM Noise Verification Record Sheets WE03 Possession: F1.713507, F1.713512, F1.713524, F1.713528, F1.713532, F1.713539 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025 • OOHW Application Form WE03_2026_FSM_SM_WSA_OOHW_form 070 Rev01 ER Signed, 16/7/2026 • OOHW Application Form WE04_2026_FSM SM_WSA_OOHW_form 072 Rev00 ER Signed, 23/7/2026	C	In accordance with CSSI 10051, a DNVIS is to be prepared for each construction site before construction noise and vibration impacts commence for any work that may exceed the NMLs, vibration criteria and / or ground borne noise levels specified in **Conditions E43** and **E44** at any residence outside construction hours identified in **Condition E38**, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under **Condition E87**. The DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval and recommends whether the proposed works can be managed to comply with SSI 10051. **Condition E43** is addressed under the DNVIS Section 5.1 which sets out General Cosmetic Damage Vibration Goals. Section 8.4 sets out Additional Mitigation Measures and Section 8.6 Community Notification. A sample of OOH Permits was reviewed during the audit: • OOHW Application Form WE03_2026_FSM_SM_WSA_OOHW_form 070 Rev01 ER Signed, 16/7/2026 • OOHW Application Form WE04_2026_FSM SM_WSA_OOHW_form 072 Rev00 ER Signed, 23/7/2026 The permits cover a range of works including a Saturday OOHW shift and midweek OOHW. Mitigation measures are included in each OOHW Permit. Auditees advised there were no potentially vibration impacted receivers identified during the audit period (other than the platform building).
E44	All reasonable and feasible mitigation measures must be applied when the following residential ground-borne noise levels are exceeded: (a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and (b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A). The mitigation measures must be outlined in the **Noise and Vibration CEMP Sub-plan**, including in any **Out-of-Hours Work Protocol**, required by **Condition E42**.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • FSM Complaints Register February-August 2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Approval AEW Footbridge St Marys DNVIS Rev D, dated 11/2/2025	NT	Ground-borne noise has not been identified as an issue relevant to FAW_FSM during the audit period. Ground-borne noise criteria and potential impacts associated with ground-borne noise is set out in Sections 4.4 and 6.6 of the FSM DNVIS. LOR has predicted that ground-borne noise impacts for FSM are expected to be negligible and deemed a detailed ground-borne noise assessment is not required. There were no complaints received related to ground-borne noise during the audit period.
E45	Noise generating work in the vicinity of potentially-affected community, religious, educational institutions and noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled within sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev05, dated 18/6/2025 • FSM Complaints Register February-August 2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	Auditees advised **Condition E45** has not been relevant during the audit period.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	Laing O'Rourke / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Noise and Vibration Mitigation and Management				
E46	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise and v bration levels are minimised around sensitive land use(s). Practices may include, but are not limited to: (a) use of regularly serviced low sound power equipment; (b) at source control, temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; (c) use of non-tonal reversing alarms; and (d) use of alternative construction and demolition techniques.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, dated 25/8/2025 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • Elevated Work Platform Pre-Mobilisation Checklist Ref: F63190.702, 80ft Genie Diesel Knuckle Boom EWP, dated 9/3/2026 • Elevated Work Platform Pre-Mobilisation Checklist Ref: F63190.827, Skyjack 32ft Diesel Rough Terrain Scissor Lift EWP, dated 15/6/2026	C	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. (a) Plant and equipment service records are managed via the Field view 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 / squawkers (no beepers allowed). (d) Examples of the use of alternative construction and demolition techniques was discussed and included a the use of rechargeable battery operated lighting towers. There was no demolition undertaken during the audit period. Proposed saw cutting in replacement of hammering for canopy removal.
E47	Detailed **Noise and Vibration Impact Statements (DNVIS)** must be prepared for any work that may exceed the NMLs, vibration criteria and / or ground-borne noise levels specified in **Conditions E43 and E44** at any residence outside construction hours identified in **Condition E38**, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under **Condition E87**. The **DNVIS** must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the **DNVIS** must be provided to the **ER** before the commencement of the associated works. The Planning Secretary and the EPA may request a copy (ies) of the **DNVIS**.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, dated 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • Sydney Metro WSA ER Monthly Report February 2026, dated 6/3/2026 • Sydney Metro WSA ER Monthly Report March 2026, dated 7/4/2026 • Sydney Metro WSA ER Monthly Report April 2026, dated 7/5/2026 • Sydney Metro WSA ER Monthly Report May 2026, dated 5/6/2026 • Sydney Metro WSA ER Monthly Report June 2026, dated 6/7/2026 • Sydney Metro WSA ER Monthly Report July 2026, dated 6/8/2026	C	A DNVIS to assess out of hours work (OOHW) has been prepared for the project site and was available on the project website. A Land Use Survey was prepared for the assessment and forms Section 3.1 to the DNVIS. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs). Sensitive receiver information in the DNVIS is captured from the Land Use Survey. Receivers potentially sensitive to noise and vibration have been categorised as residential buildings, commercial/industrial buildings, or 'other sensitive' land uses which includes educational institutions, childcare centres, medical facilities, places of worship, outdoor recreation areas, etc. The following receivers nearby the FAW_FSM project site have been identified to potentially contain Sensitive Scientific or Medical Equipment: • Emerald Medical Centre - 65A Queen Street, Belar St, St Marys NSW 2760 • Autopak-Vetlab Group - 39 Harris St, St Marys NSW 2760 The DNVIS is provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Implementation of the specific mitigation measures is verified by the LORAC Environment Manager, and the ER during construction, as evidenced in ER inspection and monthly reports. LORAC is conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works.
E48	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before works that generate vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers must be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	Auditees advised there were no vibratory activities with the potential to affect buildings, structures or receivers identified during the audit period. There was therefore no v bration 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. 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: • St Marys Commuter Car Park • Platforms 1/2 and 3/4 (Heritage listed - 1888 & 1942-3) • Platforms 3/4 building (Heritage Listed - 1888). Potential vibratory impacts are also assessed in the OOHW Permit process. It is understood that notification to properties at risk of exceeding v bration screening criteria would generally be captured in the notification process for noisy works.
E49	Where sensitive land use(s) are identified in **Appendix B** as exceeding the highly noise affected criteria during typical case construction, mitigation measures must be implemented with the objective of reducing typical case construction noise below the highly noise affected criteria at each relevant sensitive land use(s). Activities that would exceed highly noise affected criteria during typical case construction must not commerce until the measures identified in this condition have been implemented, unless otherwise agreed with the Planning Secretary. ***Note:*** *Mitigation measures may include path barrier controls such as acoustic sheds and/or noise walls, at-property treatment, or a combination of path and at-property treatment.*	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	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.

Item	
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Auditee/ Client:	Laing O'Rourke / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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 feas ble 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 13, 1/6/2026	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 13, 1/6/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • 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. ***Note**: If an offer has been made but is not accepted, this does not preclude the commencement of construction under **Condition E49**.*	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • 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 13, 1/6/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • 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	V bration testing must be conducted during v bration 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 v bration 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, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • ER Interview, 12/8/2026 • SMWSA_St Marys Station Enabling Works Heritage Procedure_Amended Final 4_2023.05	NT	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. Refer to **Condition A2** for more information. Vibration monitoring was undertaken inside the St Marys platform building during resurfacing platform works during the WE48 possession. Vibration monitoring results indicated no exceedances with the vibration criteria (5mm/s).
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, 11/8/2026 • SMWSA_St Marys Station Enabling Works Heritage Procedure_Amended Final 4_2023.05 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025	NT	Section 4.2.6 of the Heritage Management Procedure sets out methods for the installation of v bration monitoring equipment "*It is not expected that the use of vibration intensive plant would exceed the identified cosmetic damage vibration limits. To ensure that the FSM works do not cause vibration impacts to significant elements such as the Platform 3/4 Building, vibration monitors would be installed and reviewed during the works. Where vibration monitors are attached to significant elements, they would not be attached with permanent fixings and should be installed in positions where they could not be accidently or deliberately damaged. Only adhesives which are removeable without causing damage to fabric would be used*". LOR advised the vibration monitor in the platform building was placed on a shelf rather than being attached to the building wall.
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, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • SM-WSA Cumulative Impact Meeting Minutes #024 18/2/2026 • SM-WSA Cumulative Impact Meeting Minutes #025 18/3/2026 • SM-WSA Cumulative Impact Meeting Minutes #026 15/4/2026 • SM-WSA Cumulative Impact Meeting Minutes #027 20/5/2026 • SM-WSA Cumulative Impact Meeting Minutes #028 17/6/2026 • SM-WSA Cumulative Impact Meeting Minutes #029 15/7/2026	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 OOHW procedures discussed elsewhere during the audit. No utility relocation works have been undertaken by LOR during the audit period. 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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Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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	In order to undertake out-of-hours work outside the work hours specified under **Condition E38**, appropriate respite periods for the out-of-hours work must be identified in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: (a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and l kely noise levels of the work; and (d) likely mitigation and management measures which aim to achieve the relevant NMLs under **Condition E43** (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers). The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the **ER** before the out of hours work commences, and to the EPA and the Planning Secretary on request. ***Note:*** *Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the RBL at any residence.*	• ER interview, 12/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • E57 Consultation Report, WE34 - FSM, 18/2/2026 • WE34_2026_FSM SM_WSA_OOHW form 059 Rev01 ER signed, 19/2/2026 • E57 Consultation Report, WE44, WE45, WE46, WE47 - FSM, dated 30/4/2026 • WE44, WE45, WE46 & WE47_2026_FSM SM_WSA_OOHW form065 Rev01 ER sign, dated 1/5/2026 • E57 Consultation Report, WE48 - FSM, dated 19/5/2026 • WE48_2026_FSM SM_WSA_OOHW_form 066 Rev02 ER Signed, dated 29/5/2026 • E57 Consultation Report, MW03 & MW04 - FSM, dated 16/7/2026 • MW03_MW04_2026_FSM_SM_WSA_OOHW_form 071 Rev01 ER Signed, dated 16/7/2026 • E57 Consultation Report, WE03 - FSM, dated 16/7/2026 • WE03_2026_FSM_SM_WSA_OOHW_form 070 Rev01 ER Signed, 16/7/2026 • E57 Consultation Report, WE04 - FSM, dated 23/7/2026 • WE04_2026_FSM SM_WSA_OOHW_form 072 Rev00 ER Signed, 23/7/2026 • Environmental incident & non-compliance notification report, EVT-0002256, dated 4/5/2026	NC	The application of **Condition E57** for FAW_FSM is usually via a case by case assessment for RO and AA offers for sensitive receivers. A representative selection of **E57 Consultation Reports** (and corresponding OOHW Permits) were sighted during the audit, including evidence of submission to the ER. **E57** Consultation Reports were reviewed for rail possessions during WE34, WE44, WE45, WE46, WE47, WE48, MW03 & MW04, WE03 & WE04. Out of hours work during possession at St Marys Station during the audit period typically included: Platform resurfacing; Column Cladding; Wall sealing; Track 2/3 ULX removal; Spark gap testing and cable bracket install; Escalator cladding, capping and silicone works; Skylight glazing panel replacement; Concourse canopy cladding; Hearing loops; Fire hydrant installation; & Cable running. **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 distr bution 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: https://www.sydneymetro.info/station/st-marys-metro-station Where impacted properties have not been able to be reached by door-knocking, 'SWMY' slips are left at the property that include contact details to get in touch. **E57** Consultation Reports were also available on the LOR_FSM project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/. LOR is conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works. **MOD 2** was determined on 20/12/2024 and amends **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Planning Secretary on request. No such requests are known to have been made. **Self-Reported NC001**: ***A Non-compliance with Condition E57 was self-reported during the audit period. CoA E57 states "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 prior to the out-of-hours work commencing on request." The draft E57 report was sent to the ER on the 28/4/2026 for review with works commencing on the 02/05/2026. The final E57 report was provided to the ER for information, 2 days post works commencing which is inconsistent with what the timing outlined within the Planning Approval.*** ***The impact of the non-compliance was minor as this was an administrative mistake. No respite periods were triggered for the out-of-hours work.*** ***Corrective actions raised included: Reminders will be in place in Laing O'Rourke's Environmental teams calendars to ensure E57 reports are sent the Environmental Representative prior to work commencing in the future.***
Noise Mitigation - Operational Noise and Vibration Mitigation Measures				
E58	The Proponent must prepare an Operational Noise and V bration Review (**ONVR**) to confirm noise and vibration mitigation measures that would be implemented for the Operation of the CSSI for the ultimate service. The **ONVR** must be prepared as part of the iterative design development and in consultation with the EPA, relevant council(s), other relevant stakeholders and must: (a) identify appropriate Operational noise and vibration objectives and levels for surrounding development, including existing and potential future (as known at the time of ONVR preparation) sensitive land use(s); (b) confirm the operational noise and vibration predictions based on the expected final design. Confirmation must be based on an appropriately cal brated 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 V bration: 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 V bration: 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 v bration complaints management, including investigation and monitoring (subject to complainant agreement). The **ONVR** must be verified by an independent acoustic expert and submitted to the Planning Secretary for approval before the implementation of any operational noise mitigation measures. The Proponent must implement the identified noise and vibration control measures and make the **ONVR** publicly available. ***Note*** *: The design of noise barriers and the like must be undertaken in consultation with the relevant stakeholders, including affected landowners and businesses (or a representative of a business), Western Parklands City Authority and relevant council(s) as part of the* ***Place, Urban Design and Corridor Landscape Plan*** *required under* ***Condition E79***.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition E58** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).

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Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E59	Operational noise mitigation measures as identified in **Condition E58** that will not be physically affected by work, must be implemented within six months of submitting the ONVR, unless otherwise agreed by the Planning Secretary. Where implementation of operational noise mitigation measures are not proposed to be implemented in accordance with this requirement, the Proponent must submit to the Planning Secretary a report providing justification as to why, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures are implemented.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition E59** is not applicable to **FAW_FSM** as per the Staging Report Rev 13, Appendix B (Applicability of SMWSA CoA to each project stage).

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NC	Non-Compliant (NC)
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E60	Within 12 months of the commencement of operation of the CSSI, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the CSSI against the noise performance predicted in the review of noise mitigation measures required by **Condition E58**. An **Operational Noise and Vibration Compliance Report (ONVCR)** must be prepared to document this monitoring and include, but not necessarily be limited to: (a) noise and vibration monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under **Condition E58**; (b) methodology, location and frequency of noise and v bration monitoring undertaken, including monitoring sites at which CSSI noise and vibration levels are ascertained, with specific reference to locations indicative of impacts on receivers; (c) a review of the performance of the CSSI against the: (i) operational noise levels in terms of criteria and noise goals established in the *NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry* (EPA, 2017); (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing V bration: a Technical Guideline (DECC, 2006); (d) details of any complaints and enquiries received in relation to Operational noise and vibration generated by the CSSI (between the date of commencement of Operation and the date the report was prepared); (e) an assessment of the performance and effectiveness of applied noise and vibration mitigation measures together with a review and if necessary, reassessment of mitigation measures; (f) identification of: (i) additional measures to meet the criteria outlined in the NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017), (ii) additional measures to meet the vibration goals for human exposure for existing sensitive land, as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (iii) when these measures are to be implemented; and (iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA. The **ONVCR** must be submitted to the Planning Secretary and the EPA within 60 days of completing the Operational noise and vibration monitoring and made publicly available. ***Note:*** *Refer to* ***Condition B5*** *about how personal information will be handled.*	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition E60** is not applicable to **FAW_FSM** as per the Staging Report Rev 13, Appendix B (Applicability of SMWSA CoA to each project stage).
PLACE, URBAN DESIGN AND VISUAL AMENITY				
Construction Sites				
E61	Wayfinding information must be incorporated on temporary hoardings to guide pedestrians around the St Marys construction site and enhance their understanding and experience of the locality and space.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • FSM Complaints Register February-August 2026	C	Wayfinding signage was installed on the hoarding around the St Marys station site, as observed during the IA10 site inspection. Traffic signage was in place diverting pedestrians around the Harris Street footpath works.
E62	The CSSI must be constructed in a manner that minimises visual impacts of construction sites including temporary landscaping and vegetative screening, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, wherever practicable.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • FSM Complaints Register February-August 2026	C	Visual mitigation measures observed to be installed during the site inspection at St Marys included: • Hoarding or ATF with shadecloth installed around the project site. • No graffiti was observed and is understood to be removed promptly when identified. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There have been no complaints regarding visual impacts during the audit period.
Design Requirements and Strategic Context				
E63	The CSSI must be designed with consideration of: (a) the design objectives, principles and guidelines identified in documents listed in **Condition A1**; (b) the principles and objectives of the draft Connecting with Country Framework; (c) relevant land use changes, masterplans and initiatives, where this information is known and/or available; (d) existing and proposed future local context and character; and (e) transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined. Responses to items (a) – (e) must be reviewed by the **Design Review Panel (DRP)** to inform the design of permanent built works and landscape design of the CSSI. The outcome of the **DRP** review must be provided to the Planning Secretary prior to the submission of the **Place, Urban Design and Corridor Landscape Plan (PUDCLP)**. ***Note:*** *In accordance with Condition A10 and Condition A16, the requirements of this condition can be staged.*	• Interview with Sydney Metro & LOR, 11/8/2026 • 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	The St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP) has been prepared to address the requirements of **Condition E63**. The FSM PUDCLP – **E63** Compliance Statement, 19/12/2024 was provided as evidence and outlines compliance with **Condition E63**, as verified by LOR. Submission of the PUCLP 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 PUCLP.

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Design Guidance and Standards - Lighting and Security				
E64	The CSSI must be constructed and operated with the objective of minimising light spill to surrounding properties. All lighting associated with the CSSI must be consistent with the requirements of: (a) *ASINZS 4282:2019 Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series ASINZS 1158 - Lighting for Roads and Public Spaces;* (b) *NASF Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports;* and (c) *NASF Guideline C: Managing the risk of wildlife strikes in the vicinity of airports.* Mitigation measures must be provided to manage residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.	• Interview with Sydney Metro & LOR, 11/8/2026 • ER Inspection Reports Feb-August 2026 • FSM Complaints Register February-August 2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • OOHW Permits • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024	C	The OOHW approval process includes an assessment of controls to be applied to minimise light spill during construction. Mitigation measures to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners are included in the approval process during night works. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There were no complaints re: light spill during the audit period. Lighting is provided on the hoarding for safe pedestrian access at night-time. Lighting has been installed on the platforms and on the footbridge. Evidence that outdoor lighting design complies with the guidelines was sighted in Section 6.3.4 of the PUDCLP.
Design Guidance and Standards - Active Transport				
E65	Designs must have regard to the Movement and Place Framework relevant guidance including the *Walking Space Guide: Towards Pedestrian Comfort and Safety (*TfNSW, 2020) and the *Cycleway Design Toolbox: Designing for Cycling and Micromobility* (TfNSW, 2020).	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition 65** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E66	Active transport facilities must be designed, constructed and/or rectified in accordance with the Guide to Road Design Part 6A: Paths for Wa king and Cycling (Austroads, 2017) and relevant Australian Standards (AS) such as 1428.1-2009 Design for access and mobility. The active transport links must also incorporate relevant Crime Prevention Through Environmental Design principles.	• Interview with Sydney Metro & LOR, 11/8/2026 • FSM Complaints Register February-August 2026 • AEW Footbridge St Marys CEMP Rev06, dated 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	The FSM PUDCLP addressed compliance with **Condition E66**. Refer to Sections 3.8 Pedestrian modelling, 4.5 Access and Circulation, 5.1 Vision and Objectives, & 6.1 Landscape Plan. The FAW_FSM PUDCLP states "*The requirements of the Guide to Road Design Part 6A and relevant Australian Standards including AS1428.1-2009 have been integrated into the design of St Marys Station footbridge where applicable*". The PUDCLP, Appendix D includes the Interchange Access Plan (IAP), which provides further detail on the transport requirements and principles that are applied to the St Marys Station footbridge precinct. Bike shelter construction was close to completion in the Western Plaza and forms part of the overall ATC design.
Design Review Panel and Design Review				
Panel Membership				
E67	The Proponent must establish an independent **DRP** to provide advice and recommendations to the Proponent during the CSSI's design development and construction to facilitate quality design and place outcomes. The **DRP** must be formed and hold its first meeting within six months of the date of this approval, or as otherwise agreed with the Planning Secretary. ***Note:*** *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.*	• Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The Sydney Metro Design Review Panel (DRP) Terms of Reference, Western Sydney Airport Line were sighted and available on the project website. The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month. Participants are set out in Section 3 and include the DRP Chair and panel, including Panel Advisor, Coordinator and SM Project Advisor. Special advisors and external stakeholders may be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E68	The respons bilities of the Design Review Panel include: (a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI (b) provide advice on the application of Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines to key design elements in relation to place making, architecture, heritage, urban and landscape design and artistic aspects of the CSSI; and (c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines. The Panel's advice must be consistent with the CSSI as approved.	• Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The roles and respons bilities of the DRP are set out in Section 3 of the Terms of Reference and align with **Condition E68**.
E69	The **DRP** must be chaired by the NSW Government Architect (or their nominee), and must be comprised of, where relevant, by suitably qualified, experienced and independent professional(s) in each of the fields of: (a) urban design and place making; (b) landscape architecture; and (c) architecture. The Panel may seek advice from suitably qualified, experienced independent professionals in other fields as required, including but not limited to sustainability, active transport and non-Aboriginal heritage. The Panel must also seek appropriate expertise to ensure Aboriginal cultural heritage and cultural values inform its advice.	• Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The role of the DRP Chair is set out in Section 3.1 of the DRP Terms of Reference and states DRP meetings are chaired by the NSW Government Architect or their nominee. In the event of their absence, the Chair may nominate an Alternative Chair from the regular Panel members.
E70	Panel members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.	• Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The responsibilities of Panel Members are set out in Section 3.2 of the DRP Terms of Reference.

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Operation of the Design Review Process				
E71	Prior to forming the **DRP**, a **Design Review Panel Terms of Reference** is to be developed and endorsed by the NSW Government Architect. The **Terms of Reference** must be submitted to the Planning Secretary once it is endorsed by the NSW Government Architect and: (a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5); (b) outline the frequency of **DRP** meetings, coordinated with the Proponent's program requirements, as outlined in **Condition E76**, to ensure timely advice and design adjustment; and (c) identify cessation arrangements.	• Interview with Sydney Metro & LOR, 11/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The SM-WSA DRP Terms of Reference has been prepared and is available on the project website. The DRP Terms of Reference (Western Sydney Airport line and Metro West) was endorsed by the Government Architect NSW on 4/3/2022. The DRP Terms of Reference was submitted to DPHI for information. The Terms of Reference addresses each part of **Condition E71** as follows: a) Section 3.2 of the DRP Terms of Reference commits to consistency with the NSW State Design Review Panel Terms of Reference b) The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month c) Cessation arrangements are set out in Section 5.
E72	The **DRP** must be operated and managed in accordance with the **Design Review Panel Terms of Reference**.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026	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. The DRP has not been meeting frequently during the audit period as there has been no change in design. Meetings are scheduled on an as-needs basis. There was one meeting held during the IA6 audit period, dated 23/4/2026. The DRP met at Horsley Park to view design prototypes.
E74	The relevant council may be invited to the meetings of the Panel as observers or to provide feedback on key design elements of the CSSI.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026	C	Section 3 of the DRP Terms of reference sets out the procedure for special advisors and external stakeholders to be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E75	**DRP** advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation must be included when submitting the final **PUDCLP** to the Planning Secretary for information.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with **Condition E75**, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. A record of advice and recommendations register was available for review in Appendix C of the Stage 1 PUDCLP to satisfy **Condition E75**.
E76	The Proponent must provide the design development schedule to the **DRP** prior to its first meeting, including details of when relevant elements of the detailed design will be available for review by the Panel. The schedule must be updated every three months until the detailed design process is complete.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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	A package of slides was presented to the DRP on 1/2/2024 (DRP #36) providing the DRP with a future Design Development Schedule as required under **Condition E76**. A copy of the agenda was also provided for review. ***NB:*** *The requirement for the Design Development Schedule to be provided to the DRP prior to its first meeting was not verified during this audit (outside the audit period and scope), but should be verified by the Proponent to ensure compliance with* ***Condition E76.***

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Place, Urban Design and Corridor Landscape Plan				
E77	A **PUDCLP** must be prepared to document and illustrate the permanent built works and landscape design of the CSSI and how these works are to be maintained. The **PUDCLP** must be: (a) prepared by a suitably qualified and experienced person(s) in consultation with the community (including the affected landowners and businesses or a representative of the businesses), Western Parklands City Authority, Western Sydney Planning Partnership and relevant council(s); (b) reviewed by an independent and suitably qualified and experienced person nominated by the DRP; (c) submitted to the Planning Secretary prior to the construction of permanent built surface works and/or landscaping, excluding those elements which for ecological requirements, or technical requirements, or requirements as agreed by the Planning Secretary do not allow for alternate design outcomes; and (d) implemented during construction and operation of the CSSI. ***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.*	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026 • 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 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP) was finalised in December 2024 and submitted to DPHI on 19/12/2024. The requirements of **Condition E76** are addressed in the FSM PUDCLP. Refer to Section 1.5 Qualified Persons, Section 2 Collaboration and Consultation, and Appendix A - Evidence of collaboration and consultation.
Place, Urban Design and Corridor Landscape Plan - Documentation				
E78	The **PUDCLP** must document how the following matters have been considered in the design and landscaping of the project: (a) the requirements of **Conditions E63** to **E65**, and (b) advice and recommendations from the **DRP**.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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	Compliance with **Conditions E63 to E65** is addressed in Section 1.7 of the St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP). Appendix C of the PUDCLP sets out how advice and recommendations from the DRP has been addressed.
E79	The PUDCLP must include descriptions and visualisations (as appropriate) of: (a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals; (b) plans for station precincts including but not limited to (i) justification of the spatial scope of each station precinct plan; (ii) provision for public art and heritage interpretation installations; (iii) placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents; (iv) interchange access plans developed in consultation with the **Traffic and Transport Liaison Group**; (v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures; (vi) design of commuter car parking elements, where relevant; (c) landscaping and building design opportunities to mitigate visual impacts and minimise light spill on the nearby residences; (d) the design of watercourse crossings and east-west corridor movements to give to effect of Condition E14; (e) landscaping: (i) landscape plan, hard and soft elements, for the corridor and the station precincts; (ii) use of native species from the relevant native vegetation community (or communities), where identified as appropriate; (iii) water sensitive urban design initiatives (vii) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (viii) measures to prevent wildlife strike risk in proximity to Western Sydney International Airport; (f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant; (g) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (h) operational maintenance standards; and (i) the timing and responsibilities for implementation of elements included within the **PUDCLP**.	• Interview with Sydney Metro & LOR, 11/8/2026 • St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP), RevG December 2024	C	In accordance with **Condition E75**, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the St Marys Station Footbridge Place, Urban Design and Corridor Landscape Plan (PUDCLP) and issued to the Planning Secretary for information. Section 1.7 of the Stage 1 PUDCLP addresses compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the previous audit and no changes reported during the current audit period.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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, 11/8/2026	**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 13, 1/6/2026	**NT**	**Condition E81** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage). Sydney Metro is currently working through transferring maintenance ownership of the soft landscaping to Sydney Trains.
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, 11/8/2026 • Site inspection, 11/8/2026	**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. No disruption to services is known to have occurred to date. No damage to infrastructure or property has occurred during the audit.
E83	The utilities and services (hereafter "services") potentially affected by construction must be identified to determine requirements for diversion, protection and / or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. Disruption to services resulting from construction must be avoided, wherever possible, and advised to customers where it is not possible.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys DNVIS, RevD, dated 24/1/2025 • FSM Utilities Management Plan, Stage 2, Rev0, dated 15/7/2025	**C**	A Utilities Management Plan has been prepared and serves as a guide to provide systematic methods for planning, implementing and performing construction work, including for excavation works. The intent of the document is to eliminate or minimise the risks of fatalities, injuries and events arising from conducting work in the vicinity of underground, overhead and concealed services. There was no interface with services during the ongoing footpath works along Harris Street, and no interface with services reported by Auditees during the audit period.
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, 11/8/2026 • 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, 11/8/2026 • 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.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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).**	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 • FSM - Possession Report 5 - WE48 - MON 01-06-2026.pdf • WE48 Config 7 A3 Maps V3.pdf	C	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 6/1/20256 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. Evidence of report of damage to rail infrastructure on 21/12/2025 & evidence of damage rectification complete sighted. Further damage to points on the rail line occurred during the WE48 rail possession, resulting in a derailment. The possession progress report for WE48 was sighted as well as the Infrastructure handover and certification form & Worksite rectification checklist.
E87	Appropriate equipment to monitor areas in proximity of ancillary facilities and the tunnel route must be installed during construction with particular reference to at risk buildings, structures and utilities identified in the condition surveys required by **Condition E84** and / or geotechnical analysis as required. If monitoring during construction indicates exceedance of the vibration criteria identified in the **DNVIS** prepared under **Condition E47**, or levels otherwise determined as appropriate by a suitably qualified structural engineer, then all construction affecting settlement must cease immediately and must not resume until fully rectified or a revised method of construction is established that will ensure protection of affected buildings.	• Interview with Sydney Metro & LOR, 11/8/2026	NT	Not triggered within the audit period. Auditees advised no at risk buildings have been identified under **Condition E87**. Section 7 of the DNVIS identifies heritage buildings within the vicinity of the project and includes mitigation measures to reduce vibration risk. There has been no damage determined to have occurred as a result of the project. Auditees advised no vibratory activities requiring vibration or settlement monitoring have been conducted during the audit period.
E88	An **IPIAP** must be established prior to tunnelling activities commencing. The Planning Secretary must be informed of the members of the **IPIAP** and must comprise geotechnical and engineering experts independent of the design and construction team. The **IPIAP** will be responsible for independently verifying condition surveys undertaken under **Conditions E84** and **E85**, the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements.	• Sydney Metro WSA Staging Report Rev 13, 1/1/2026	NT	**Condition E88** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E89	Either the affected property owner or the Proponent may refer unresolved disputes arising from potential and/or actual property impacts to the **IPIAP** for resolution. All costs incurred in the establishing and implementing of the panel must be borne by the Proponent regardless of which party makes a referral to the **IPIAP**. The findings and recommendations of the **IPIAP** are final and binding on the Proponent.	• Sydney Metro WSA Staging Report Rev 13, 1/1/2026	NT	**Condition E89** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E90	Settlement must be monitored for any period beyond the minimum timeframe requirements of **Condition E87** if directed so by the **IPIAP** following its review of the monitoring data from the period not less than six (6) months after settlement has stabilised, consistent with **Condition E87**. The results of the monitoring must be made available to the Planning Secretary upon request.	• Sydney Metro WSA Staging Report Rev 13, 1/1/2026	NT	**Condition E90** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
Small Business Owners Engagement Plan(s)				
E91	**Small Business Owners Engagement Plan(s)** must be prepared for St Marys and implemented in accordance with the **Overarching Community Communication Strategy** to minimise impact on small businesses directly affected by construction activities at St Marys during construction. The plan must be prepared and submitted to the Planning Secretary for information before the commencement of construction at St Marys.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • AEW FSM Community Liaison Plan, including Small Business Owners Engagement Plan RevD, dated 2/12/2024 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/	C	The Community Liaison Plan, including Small Business Owners Engagement Plan, Footbridge St Marys was provided for review and was available on the LOR project website in the community section. The requirement to submit to the Planning Secretary was assessed during a previous audit.
SOILS AND CONTAMINATION				
Contaminated sites				
E92	Before commencement of any construction that would result in the disturbance of moderate to high risk contaminated sites as identified in the documents identified in **Condition A1, Detailed Site Investigations** (for contamination) must be conducted to determine the full nature and extent of the contamination. The **Detailed Site Investigation Report(s)** and the subsequent report(s), must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The Detailed Site Investigations must be undertaken in accordance with guidelines made or approved under section 105 of *Contaminated Land Management Act 1997* (NSW). ***Note**: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.*	• Interview with Sydney Metro & LOR, 11/8/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024 • Letter Sydney Metro to DPHI RE: SM-WSA Submission of Detailed Site Investigation Report under Condition of Approval E97 - AEW FSM, dated 28/8/2024 • Letter DPHI to Sydney Metro RE: SM-WSA AEW FSM Detailed Site Investigation Report, dated 09/9/2024	NT	A Detailed Site Investigation (DSI) was conducted for the Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, by ADE, in a report dated 21/8/2024. 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.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E93	Should remediation be required to make land suitable for the final intended land use, a **Remedial Action Plan** must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The **Remedial Action Plan** must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (NSW) and must include measures to remediate the contamination at the site to ensure the site will be suitable for the proposed use when the **Remedial Action Plan** is implemented. ***Note:*** *Nothing in this condition prevents the Proponent from preparing individual* ***Remedial Action Plans*** *for separate sites.*	• Interview with Sydney Metro & LOR, 11/8/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the FAW_FSM project.
E94	Before commencing remediation, a **Section B Site Audit Statement(s)** must be prepared by an NSW EPA-accredited Site Auditor that certifies that the **Remedial Action Plan(s)** is/are appropriate and that the site can be made suitable for the proposed use. The **Remedial Action Plan(s)** must be implemented and any changes to the **Remedial Action Plan(s)** must be approved in writing by the NSW EPA -accredited Site Auditor. ***Note:*** *Nothing in this condition prevents the Proponent from engaging an NSW EPA-accredited Site Auditor to prepare individual Site Audit Statements for Remedial Action Plans for separate sites.*	• Interview with Sydney Metro & LOR, 11/8/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the FAW_FSM project.
E95	**Validation Report(s)** must be prepared in accordance with *Consultants Reporting on Contaminated Land: Contaminated Land Guidelines* (EPA, 2020) and relevant guidelines made or approved under section 105 of the *Contaminated Land Management Act 1997* (NSW). ***Note:*** *Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.*	• Interview with Sydney Metro & LOR, 11/8/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the 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. ***Note:*** *Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.*	• Interview with Sydney Metro & LOR, 11/8/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024	NT	There is no remediation known to be required as part of the 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.	• Interview with Sydney Metro & LOR, 11/8/2026 • LOR Project website: https://www.laingorourke.com/projects-and-sectors/australia/st-marys-station-footbridge/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FSM Detailed Site Investigation (DSI) Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, ADE, dated 21/08/2024 • Letter Sydney Metro to DPHI RE: SM-WSA Submission of Detailed Site Investigation Report under Condition of Approval E97 - AEW FSM, dated 28/8/2024 • Letter DPHI to Sydney Metro RE: SM-WSA AEW FSM Detailed Site Investigation Report, dated 09/9/2024	C	A Detailed Site Investigation (DSI) was conducted for the Laing O'Rourke Compound, AEC1 32-34 Harris Street, North Saint Marys, by ADE, in a report dated 21/08/2024. ADE found that "*All soil samples collected during this investigation reported chemical concentrations below the adopted site assessment criteria. Visual inspection of the subject materials did not identify indicators of PASS, hydrocarbon odours / staining and or ACM*". No moderate-high-risk contaminated sites are known to have been identified for the FSM package of works. The DSI was submitted to DPHI as required, dated 28/8/2024. Submission of the DSI to councils was verified during previous IEAs.
E98	An **Unexpected Contaminated Land and Asbestos Finds Procedure** must be prepared before the commencement of construction and must be followed should unexpected contaminated land or asbestos (or suspected contaminated land or asbestos) be excavated or otherwise discovered during construction.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP, Rev 06, dated 18/2/2026 • 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.
E99	The **Unexpected Contaminated Land and Asbestos Finds Procedure** must be implemented throughout construction.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev 06, dated 18/2/2026 • 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)	NT	On 8/3/2025 an unexpected find of asbestos was identified at St Marys Station, between Platforms 3 and 4 during excavation. This event was reviewed as an example during the audit. Auditees provided the following evidence for review: • Waste Disposal tracker including the waste generated from the above asbestos UEF • Corresponding disposal dockets • EPL of the receiving facility • Waste Classification report/certificate • ADE Asbestos Materials Clearance Inspection Report. Suspected asbestos containing conduits were removed by ADE and the area made safe. No ACM was observed within the removal area. ADE confirmed that "*Upon visual inspection of the subject area and surrounds, the asbestos containing materials have been removed/made safe to a satisfactory standard. The subject area may be reoccupied safely, subject to the limitations and/or notes listed above*". 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. There were no unexpected finds of contamination or asbestos encountered during the IA6 audit period.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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).	• Interview with Sydney Metro & LOR, 11/8/2026 • 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. ***Note:*** *Nothing in this condition prevents the Proponent from preparing separate Sustainability Strategies for the construction and operational stages of the CSSI.*	• Interview with Sydney Metro & LOR, 11/8/2026 • 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. ***Note:*** *Nothing in this condition prevents the Proponent from preparing separate* ***Water Reuse Strategies*** *for the construction and operational stages of the CSSI.*	• 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 feas bility assessment is included in Section 3.0 also. Onsite reuse parameters are documented in Section 4.0 and water efficiency measures are included in Section 5.0. An example water discharge permit is attached. The contents of the Water Reuse Strategy (a)-(e) have not been re-evaluated here as the strategy was prepared prior to the current audit period. **Condition E102** was verified as compliant during IA1. Water accumulated in excavations is pumped to the construction water tanks and treated prior to discharge to cess or reused for flushing toilets or dust suppression. Rainwater tanks capture runoff from the roof of the site compound buildings and is reused for flushing toilets or dust suppression.
TRAFFIC AND TRANSPORT				
E103	Construction Traffic Management Plans (**CTMPs**) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the **CTMPs** must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant **CTMP**.	• Site inspection, 11/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev G, dated 19/5/2026 • Construction Traffic and Pedestrian Management Plan -Comments register • Sydney Metro Western Sydney Airport TTLG 60 - DRAFT Minutes - 2 July 2026	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.	• Site inspection, 11/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • Live Tracking Report, Hire Activity Report 184316, dated 12/8/2026	C	An example of an Live Tracking Report 184316 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**.	• Site inspection, 11/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • 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 • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev G, dated 19/5/2026	C	Spoil haulage routes have been approved as documented in the CTMP. A Heavy Vehicle Local Roads Assessment for the Use of Local Roads (HVLR) to facilitate the project was updated to RevH in August 2024, conditionally approved, and resubmitted to DPHI for approval in August 2025. DPHI approved the HVLR RevH, including a request for extension on 14/8/2025. The HVLR was prepared in consultation with Penrith City Council and endorsed by Alex Gosper, Level 3 Road Safety Auditor. The use of the following roads was subsequently approved by the Department under **Condition E105**: • Australia Street between Hobart Street and Brisbane Street • Brisbane Street between Glossop Street and Australia Street • Hobart Street between Glossop Street and Sydney Street • Forrester Road between Harris Street and Rail Corridor The approval is limited to the period ending 30/6/2027. There were no heavy vehicles observed on local roads during the audit site inspection.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	Laing O'Rourke / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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.	• Site inspection, 11/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • 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 • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev G, dated 19/5/2026	**C**	Spoil haulage routes have been approved as documented in the CTMP. A Heavy Vehicle Local Roads Assessment for the Use of Local Roads (HVLR) to facilitate the project was updated to RevH in August 2024, conditionally approved, and resubmitted to DPHI for approval in August 2025. DPHI approved the HVLR RevH, including a request for extension on 14/8/2025. The HVLR was prepared in consultation with Penrith City Council and endorsed by Alex Gosper, Level 3 Road Safety Auditor. The use of the following roads was subsequently approved by the Department under **Condition E105**: • Australia Street between Hobart Street and Brisbane Street • Brisbane Street between Glossop Street and Australia Street • Hobart Street between Glossop Street and Sydney Street • Forrester Road between Harris Street and Rail Corridor The approval is limited to the period ending 30/6/2027. There were no heavy vehicles observed on local roads during the audit site inspection.
Road Dilapidation				
E107	Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a **Road Dilapidation Report** must be prepared for the road. A copy of the **Road Dilapidation Report** must be provided to the Relevant Road Authority(s) within three (3) weeks of completion of the survey and at no later than one (1) month before the road being used by Heavy Vehicles associated with the construction of the CSSI.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 G, dated 19/5/2026	**C**	A Road Pre-Condition Dilapidation Survey was sighted for Forrester Road (4/8/2023), and is included as Appendix 5 of the CTMP. Verification of submission of the road dilapidation report to the Relevant Road Authority, and date of first use of the road by heavy vehicles was outside the audit period so was not verified. Submission of the Road Dilapidation Report to Council was verified during a previous audit period.
E108	If damage to roads occurs as a result of the construction of the CSSI, the Proponent must either (at the Relevant Road Authority's discretion): (a) compensate the Relevant Road Authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the **Road Dilapidation Report**.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev G, dated 19/5/2026	**NT**	No damage is known to have occurred to roads during the audit period.

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Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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 queueing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land use(s); (d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the **CTMP**.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev G, dated 19/5/2026 • Construction Workers Parking Strategy, Footbridge St Marys RevA, dated 8/11/2023 • **Penrith City Council Permit Number: CWZ-P3237, Construction Work Zone, Valid 2/4/2026 to 21/6/2026** • 32 HARRIS ST, NORTH ST MARYS - PROPOSED WORKS ZONE TRAFFIC GUIDANCE SCHEME, DRAWING REF NO. STM-2604-01 • Penrith City Council Permit Number: TRO-P3068, Temporary Road Reserve Occupancy, Valid 6/3/2026 to 13/3/2026 • Penrith City Council Permit Number: TRO-P3341, Temporary Road Reserve Occupancy, Valid 26/5/2026 to 31/5/2026	C	Sections 3.4, & Sections 4.3-4.6 of the FSM CTPMP address **Condition E109**. Appendix 2 sets out the Construction Worker Parking Strategy and includes stakeholder consultation and respons bilities (LORAC, Penrith City Council and TfNSW). 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. 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. (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. (b) The proposed construction vehicle routes to and from the TAP 3 work compounds are primarily based on the approved truck routes under the Sydney Metro West CTMF. In addition, as per the existing road restriction, it is noted that a left turn from Glossop Street to Harris Street is only permitted for up to 7m long vehicles. As such, construction vehicles above 7m would only access the work compounds along Harris Street by turning left from Forrester Road onto Harris Street. (c) Truck drivers will be advised of the designated truck routes to/ from the site. No queuing or marshalling of trucks will be permitted on public roads in the vicinity of the site. In addition, construction vehicle movements will be minimised during school zone hours (i.e., 8:00am to 9:30am and 2:30pm to 4:00pm). Auditees advised engineers are in contact with delivery drivers to schedule truck movements to reduce idling and queuing. (d) Pedestrian access to the main work compound along Harris Street will be provided via a security controlled gate on the northeastern corner of the site. All personnel entering the site will be required to undertake an induction program. Trained on-site personnel will be present at the site access to manage pedestrian movements and assist with vehicle ingress and egress. (e) **Condition E109** is addressed in the CTMP, including a commitment to ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP. Driver inductions are required to be completed which includes the communication of requirements to stick to nominated haulage routes. Traffic Control Plans are prepared more locally to identify where pedestrians have access etc.
Property Access				
E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026	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.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026	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.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026	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.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E113	Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier. Property access must be reinstated within one (1) month of the work that physically affected the access is completed or in any other timeframe agreed with the landowner or occupier.	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026	**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.	• Site inspection, 11/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • 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 • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev G, dated 19/5/2026	**C**	Pedestrian, cyclist and vehicular access management are detailed in the sighted documents. Adequate signage has been implemented as per site observations and audit discussions. There have not been any complaints recorded on this matter. As per Section 4.3 of the CTPMP, pedestrian access to the main work compound along Harris Street will be provided via a security controlled gate on the northeastern corner of the site. All personnel entering the site will be required to undertake an induction program. Trained on-site personnel will be present at the site access to manage pedestrian movements and assist with vehicle ingress and egress. These measures were observed to be implemented during the audit. Work zone is being used for alternative pedestrian access during footpath construction works on Harris Street, and traffic control and signage was in place during the audit.
Pedestrian and Cyclist Access				
E115	Safe pedestrian and cyclist access must be maintained around the St Marys construction site during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternate route which complies with the relevant standards, must be provided and signposted before the restriction or removal of the impacted access.	• Site inspection, 11/8/2026 • Interview with Sydney Metro & LOR, 11/8/2026 • Community Consultation Strategy (CCS) • Construction Traffic and Pedestrian Management Plan, Footbridge St Marys Rev G, dated 19/5/2026	**C**	As per Section 4.3 of the CTPMP, pedestrian access to the main work compound along Harris Street will be provided via a security controlled gate on the northeastern corner of the site. All personnel entering the site will be required to undertake an induction program. Trained on-site personnel will be present at the site access to manage pedestrian movements and assist with vehicle ingress and egress. Safe pedestrian and cyclist access was observed around the St Marys Station site during the audit site inspection. Access ble footpaths were observed and clear around the site perimeter hoarding and into and out of St Marys Station. There have been no known instances of restricted pedestrian or cyclist access to date around the St Marys site. Traffic control is understood to be in place if pedestrian access is affected, e.g. Harris Street footpath works were observed to be underway at the time of the audit, and pedestrians were diverted into an alternative path within the barricaded work zone. Traffic control and signage was in place during the audit.
Road Traffic and Safety				
E116	A **Traffic and Transport Liaison Group(s)** must be established in accordance with the Construction Traffic Management Framework to inform the development of **CTMP**.	• Interview with Sydney Metro & LOR, 11/8/2026 • Metro WSA TTLG Meeting 55 - Minutes - 5/2/2026 • Metro WSA TTLG Meeting 56 - Minutes - 5/3/2026 • Metro WSA TTLG Meeting 57 - Minutes - 2/4/2026 • Metro WSA TTLG Meeting 60 - Minutes - 2/7/2026	**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 February -July 2026.
E117	Supplementary analysis and modelling as required by TfNSW 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 TfNSW requirements. Copies of civil, structural and traffic signal design plans shall be submitted to the Relevant Road Authority for consultation during design development and before completion of construction of the CSSI.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**NT**	**Condition E117** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E118	As part of **Condition E117** the **Traffic and Transport Liaison Group(s)** is to identify opportunities to improve the intersection performance during operation at: (a) Queen Street/Great Western Highway/Mamre Road in St Marys; (b) Glossop Street/ Forrester Road in St Marys; and (c) Glossop Street / Great Western highway in St Marys. Identified improvements must be implemented prior to the commencement of operation.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**NT**	**Condition E118** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).

Item	
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Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Finishing and Auxiliary Works (FAW)
Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users must be subject to safety audits demonstrating consistency with relevant design, engineering and safety standards and guidelines. Safety audits must be prepared in consultation with the relevant **Traffic and Transport Liaison Group** before the completion and use of the subject infrastructure and must be made available to the Planning Secretary upon request.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**NT**	**Condition E119** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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 respons ble for advising local residents and businesses affected before any planned disruption of service.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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**	A Utilities Management Plan has been prepared and serves as a guide to provide systematic methods for planning, implementing and performing construction work, including for excavation works. The intent of the document is to eliminate or minimise the risks of fatalities, injuries and events arising from conducting work in the vicinity of underground, overhead and concealed services. It applies to all manner of work activities and tasks which involve ground disturbance (potholing for utility location, topsoil or ground strip, driving star pickets or posts, trenching, boreholes, piling, bu k excavation), surface penetration (vertical walls, floor slabs or ceilings) and movement below or adjacent to overhead conductors or cabling (crane operations, plant movement, logistics, material haulage, demolition or any construction activity). Specifically, the plan: • Addresses the location of existing services potentially affected by the construction of TAP3 • Illustrates which services require to be relocated or removed • Discusses the measures to minimise and manage hazards associated with working in proximity to the services and utilities • Identify the measures and controls in place to minimise and manage any unexpected disruptions to services and utilities. 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. There were no additional works to utilities or services undertaken during the IA10 audit period.
Warragamba to Prospect Water Supply Pipeline				
E121	The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, and ensure that proposed construction and operational agreements are consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines" and implement all practical measures to protect the Warragamba to Prospect Water Supply Pipelines infrastructure, or as otherwise agreed to by WaterNSW.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**NT**	**Condition E121** is not applicable to **FAW_FSM** as per the Staging Report Rev13, 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 poss ble, waste must be treated or disposed of.	• Interview with Sydney Metro & LOR, 11/8/2026 • AEW Footbridge St Marys CEMP Rev06, dated 18/2/2026 • FSM ERAP – Waste and Resource Management • ER interview, 12/8/2026 • Appendix F - Sydney Metro Monthly Reporting - Sustainability, June 2026 • FSM - CR4 - 7 - CS3 - C&D Waste tracker • FSM - CR5 - 1 - CS3 - Spoil Tracker	**C**	The project waste register for the period was sighted, and documented waste tracking requirements in the CEMP (ERAP – Waste and Resource Management) were reviewed. The waste hierarchy as per the WARR Act is described in Section 12.8.10, Table 10 of the CEMP. Sustainability reporting is prepared monthly by Sydney Metro and the Sustainability Report for 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. At a project level for FAW_FSM, waste management is tracked by the LOR Sustainability Advisor. A **Waste Tracker** is maintained for Construction & Demolition Waste and includes a Waste Description, Subcontractor, reference to the Tipping Docket, and Final destination. The volume of office and construction waste for various waste streams is also recorded. A **Spoil Tracker** is also maintained for and includes Date, Location, Contractor, Waste contractor, Waste Classification Report Number, Description of the waste, Waste type, End use, % Recycled, EPL & Waste Facility details. Refer to **Conditions E124 & E125** for verification of the movement of spoil to offsite disposal facilities.

Item	
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Project No.	MESYM 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 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 *Protection of the Environment Operations (Waste) Regulation 2014*, as the case may be.	• Interview with Sydney Metro & LOR, 11/8/2026	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 *Protection of the Environment Operations (Waste) Regulation 2014*, or to any other place that can lawfully accept such waste.	• Interview with Sydney Metro & LOR, 11/8/2026 • FSM - CR4 - 7 - CS3 - C&D Waste tracker • FSM - CR5 - 1 - CS3 - Spoil Tracker • Waste Register Feb - Aug 2026 • EPL 6664 - Concrete Recyclers (Group) Pty Ltd • EPL 20948 - MET RECYCLING PTY LTD - Eco Cycle Material Pty Ltd • Dockets: - CR Plus, Bitumen, dated 1/5/2026 - Eastern Plant Hire, GSW, MET RECYCLING CNR Carnarvon St & Newton, Silverwater), dated 10/3/2026 - Eastern Plant Hire, GSW, MET RECYCLING CNR Carnarvon St & Newton, Silverwater), dated 7/4/2026 - CR Plus, Concrete & Bitumen, dated 28/5/2026 - Eastern Plant Hire, GSW, MET RECYCLING CNR Carnarvon St & Newton, Silverwater), dated 7/7/2026	C	At a project level for FSM, waste management is tracked by the LOR Sustainability Advisor. A **Spoil Tracker** is also maintained for and includes Date, Location, Contractor, Waste contractor, Waste Classification Report Number, Description of the waste, Waste type, End use, % Recycled, EPL & Waste Facility details. The above trackers record EPLs of disposal facilities to ensure they are appropriately licensed to accept the waste. 100% of reusable spoil and VENM removed from the FSM site to date is recorded as being recycled (0% to landfill). Non-reusable spoil is disposed to landfill.
E125	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	• Interview with Sydney Metro & LOR, 11/8/2026 • 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 • FSM - CR4 - 7 - CS3 - C&D Waste tracker • FSM - CR5 - 1 - CS3 - Spoil Tracker • Waste Register Feb - Aug 2026	C	Two in-situ Waste Classification Reports were completed in April and September 2024 to classify all areas within the platform and site compound and were reviewed during the audit. No further ex-situ waste classification was undertaken during the audit period.
WATER				
E126	The CSSI must be designed and constructed so as to maintain the NSW Water Quality Objectives (NSW WQO) where they are being achieved as at the date of this approval, and contribute towards achievement of the NSW WQO over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the CSSI contains different requirements in relation to the NSW WQO, in which case those requirements must be complied with.	• Interview with Sydney Metro & LOR, 11/8/2026	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.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition E127** is not applicable to **FAW_FSM** as per the Staging Report Rev13, Appendix B (Applicability of SMWSA CoA to each project stage).
E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026 • SM-WSA FSM Environmental Control Map (ECM) Rev17, dated 20/5/2026 • 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.
E129	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction wastewater treatment plants to surface waters must not exceed: (a) the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG (2018)) default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (ANZECC/ARMCANZ); and (c) for bio accumulative and persistent toxicants, the ANZG (2018) guidelines values at a minimum of 99 per cent species protection level. Where the ANZG (2018) does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG (2018) for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	NT	**Condition E129** is not applicable to **FAW_FSM** as per the Staging Report Rev 13, 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.*	• Interview with Sydney Metro & LOR, 11/8/2026 • Site inspection, 11/8/2026	NT	There are no construction stage stormwater discharges proposed for FSM.

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 2026106-06 Sydney Metro_IEA10_WSA_FAW_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E131	Drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) and drainage swales and depressions must be carried out in accordance with relevant guidelines and designed by a suitably qualified and experienced person.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**NT**	**Condition E131** is not applicable to **FAW_FSM** as per the Staging Report Rev 13, Appendix B (Applicability of SMWSA CoA to each project stage).
Operational Requirements				
E132	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from operational water treatment plants to surface waters must not exceed: (a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ, 2000); and (c) for bio accumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level. Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**NT**	**Condition E132** is not applicable to **FAW_FSM** as per the Staging Report Rev 13, 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 13, 1/6/2026	**NT**	**Condition E133** is not applicable to **FAW_FSM** as per the Staging Report Rev 13, Appendix B (Applicability of SMWSA CoA to each project stage).
E134	The Proponent must submit a revised **Groundwater Modelling Report** to the Planning Secretary for information before bulk excavation at the relevant construction location. The **Groundwater Modelling Report** must include: (a) for each construction site where excavation will be undertaken, cumulative (additive) impacts from nearby developments, parallel transport projects and nearby excavation associated with the CSSI; (b) predicted incidental groundwater take (dewatering) including cumulative project effects; (c) potential impacts of the CSSI or detail and demonstrate why the CSSI will not have lasting impacts to the groundwater system, ongoing groundwater incidental take and groundwater level drawdown effects; (d) actions required to minimise the risk of inflows (including in the event the CSSI are delayed or do not progress) and a strategy for accounting for any water taken beyond the life of the operation of the CSSI; (e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and (f) a schematic of the conceptual hydrogeological model.	• Sydney Metro WSA Staging Report Rev 13, 1/6/2026	**NT**	**Condition E134** is not applicable to **FAW_FSM** as per the Staging Report Rev 13, 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

Reference: SSI-10051-PA-740

Sydney Metro
Level 43
680 George Street
Sydney NSW 2000
Attention: [redacted], A/ Senior Manager, Environment, Western Sydney Airport
08/07/2026

Sent via the Major Projects Portal only

Subject: Sydney Metro - Western Sydney Airport - Auditor nomination A38

Dear [redacted],

I refer to your submission lodged via the Major Projects Portal on 11 June 2026 (SSI-10051-PA-740), requesting the Planning Secretary's agreement to suitably qualified, experienced, and independent persons to conduct the 10th combined Independent Environmental Audit of CSSI-10051, as modified, Sydney Metro Western Sydney Airport (**Approval**).

The NSW Department of Planning, Housing and Infrastructure (**Department**) has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition A38 of the Approval and the NSW Planning, Independent Audit Post Approval Requirements (2020) (**IAPAR**), as nominee of the Planning Secretary, I endorse the following independent auditor for the upcoming Independent Environmental Audit:

- Josephine (Jo) Heltborg, as lead auditor

Please ensure that this correspondence is appended to the Independent Environmental Audit.

Please note that any subsequent independent audits of the project, under the conditions of approval, require a new auditor nomination and written approval from the Planning Secretary prior to commencement.

The Department reserves the right to request an alternate auditor or audit team for future audits.

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

Noting previous correspondence for reference, the 2026 Independent Audit Post Approval Requirements (**2026 IAPAR**) have now been released are in effect. They can be accessed here: *Independent Audit Post Approval Requirements*.

Should you wish to discuss the matter further, please contact Sarah Cavaleri, (Senior Compliance Officer) on [redacted] or email compliance@dphi.nsw.gov.au

Yours sincerely

[redacted]

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

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: Jo Heltborg
Sent: Thursday, 9 July 2026 4:55 PM
To: DPE PSVC Compliance Mailbox
Subject: Independent Audit 10 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation
Attachments: Appointment of Experts_08072026_034046.pdf

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 10th 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 **3rd August 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 site inspection for the 10th SSTOM audit are in the southern portion of the project and include:

- Linewide Portion 1
- Linewide Portion 4
- Orchard Hills Station

- Claremont Meadows Service Facility
- St Mary's Station

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 February 2026).

We look forward to hearing from you before **Thursday 23rd July 2026**.

Kind regards,

Josephine Heltborg
Principal Environmental Auditor
Morasey Environment Pty Ltd
[redacted]

Jo Heltborg

From: Jo Heltborg
Sent: Thursday, 9 July 2026 5:01 PM
To: 'info@epa.nsw.gov.au'
Subject: Independent Audit 10 - 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 10th 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 **3rd August 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 EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **Thursday 23rd July 2026**.

Kind regards,

Jo Heltborg

From: Jo Heltborg
Sent: Thursday, 9 July 2026 4:59 PM
To: 'lcc@liverpool.nsw.gov.au'
Subject: Independent Audit 10 - 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 Liverpool City Council (LCC) on the scope of the 10th 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 **3rd August 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 **Thursday 23rd July 2026**.

Kind regards,

Jo Heltborg

From: Jo Heltborg
Sent: Thursday, 9 July 2026 4:57 PM
To: 'council@penrith.city'
Subject: Independent Audit 10 - 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 Penrith City Council on the scope of the 10th 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 **3rd August 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 PCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **Thursday 23rd July 2026**.

Kind regards,

Independent Environmental Audit Report 6 (IA6)

Sydney Metro

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

Audit Date: 3 August 2026

Morasey Ref: MESYM: 2026105-05

Morasey Environment Pty Ltd
[redacted]
ABN: 17 637 707 647

Independent Environmental Audit Report 6 (IA6)

Sydney Metro

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

Document Quality Management Details.	
Report Name:	Independent Environmental Audit Report 6 (IA6)
Site Details:	Sydney Metro Western Sydney Airport (SSI 10051) Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project Number:	2026105.05
Client Name:	Sydney Metro
Client Number:	MESYM

Revision	Date Prepared	Prepared By	Summary of Revision
DRAFT	14.9.2026	J. Heltborg	Draft submission to client for review
Final	21.9.2026	J. Heltborg	Final submission to client

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

EXECUTIVE SUMMARY

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (WSA) - Stations, Systems, Trains, Operations and Maintenance (SSTOM). This audit is the 10th IEA conducted for the WSA project, and the 6th IEA conducted for SSTOM.

The temporal period covered by the audit is between the date of the 5th SSTOM IEA on 9th February 2026 to the date of the site inspection for this IEA 6 (IA6) on 3rd August 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:	Development of the Sydney Metro Western Sydney Airport project comprising: • construction and operation of approximately 23 kilometres of railway track between the T1 Western Line rail line and the proposed Western Sydney Aerotropolis in Bringelly, • construction and operation of new stations and associated ancillary infrastructure at St Marys, Orchard Hills, Luddenham and the Aerotropolis Core precinct, • interchange links with the existing T1 Western Line rail line, • construction and operation of a train stabling and maintenance facility, including an operational control centre, • construction and operation of associated rail infrastructure facilities, • construction of tunnels, bridges, viaducts and associated works, • site preparation and enabling earthworks, including land remediation, • associated ancillary infrastructure and works.

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

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

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

There were no other matters considered relevant by the auditor.

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

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

Independent Environmental Audit Report 6

Sydney Metro

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

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1. INTRODUCTION

This report presents the findings of the Independent Environmental Audit (IEA) conducted by Morasey Environment Pty Ltd for Sydney Metro Western Sydney Airport (SM-WSA), Stations, Systems, Trains, Operations and Maintenance (SSTOM). This audit is the 10th IEA conducted for the SM-WSA project, and the 6th IEA conducted for SSTOM and has been conducted in accordance with the NSW Department of Planning, Housing and Infrastructure (DPHI) Independent Audit Post Approval Requirements, May 2020 (IAPARs).

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

1.1 The Project

1.1.1 Overview

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

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

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

The SM-WSA Environmental Impact Statement (EIS) was prepared in October 2020, which assessed the impacts of the construction and operation of the Project. The Project EIS was placed on public exhibition for a period of six weeks from 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 Stations, Systems, Trains, Operations and Maintenance (SSTOM), and includes the following:

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

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



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

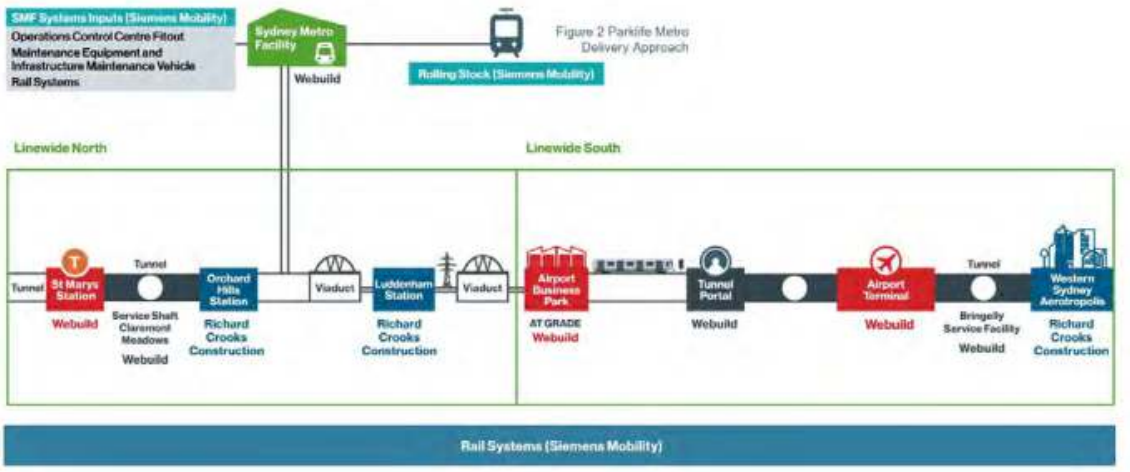


Figure 2: Overview of SSTOM Works, **Source: Parklife Metro CEMP, Rev02, 19/12/2024**

1.1.2 Planning Approval

Details of the project are as follows:

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

The SM-WSA Project was approved by the Minister for Planning and Public Spaces on 23rd 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), and within the audit period.

a. Modifications

There were no modifications during the audit period. SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amended Condition E4 to reduce the biodiversity offset credit requirement.

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

b. Consistency Assessments

There were two Consistency Assessments (CA) prepared and approved during the audit period:

- **Consistency Assessment PLM CA001** was prepared to assess consistency with the EIS for proposed project changes at Orchard Hills Station which includes a new proposed underbore alignment between Samuel Marsden Road to the existing Sydney Water submain sewer main to minimise tree removal. The new alignment:
    - Removes one maintenance hole on Samuel Marsden Road
    - Relocates the underbore entry pit, reducing the length of trenching along Samuel Marsden Road by approximately 55m.
    - Requires removal of two trees to allow connection to the existing Sydney Water sewer sub-main.
    - Provides allowance for an intermediate pit/s along the underbore alignment in locations where vegetation removal is not required.
    - Requires geotechnical testing prior to construction to confirm subsurface conditions and detailed construction methodology.

The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 25th February 2026.

- **Consistency Assessment PLM CA002** was prepared to assess consistency with the EIS for proposed project changes at the SMF site including road work required to tie-in the permanent SMF access road to the north verge of Patons Lane including minor grading and pavement work over a distance of approximately 35m east of the existing project boundary.

The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 25th June 2026.

c. Environmental Reviews

There was one Environmental Review prepared and approved during the audit period:

- **Environmental Review ER009** was prepared to assess consistency with the EIS to connect new utility work with existing services at Orchard Hills Station, located outside the approved SM-WSA Project boundary.

The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 15th July 2026.

1.1.4 Project Staging

The SM-WSA Staging Report, Revision 13.0, June 2026 was prepared and structured to address the requirements of Conditions of Approval (CoA) A10 to A16 of the CSSI 10051 planning approval. The stages of the project comprise of:

- Advanced and Enabling Works (AEW)
- Station Boxes and Tunnelling (SBT)
- Surface and Civil Alignment Works (SCAW)
- Stations, Systems, Trains, Operations and Maintenance (SSTOM)
- 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 13.0) was utilised during this audit to inform applicable conditions to the audit stage.

1.1.5 Audit Period

The audit period is between the date of SSTOM Independent Audit 5 (IA5) on 9th February 2026 to the date of the site inspection for this Independent Audit 6 (IA6) on 3rd August 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 3rd August 2026. The following activities were undertaken during the audit period:

St Mary's Station (STM):

- Station box wall and suspended slabs formed reinforced pours (FRP)
- Pre-cast beam and plank installation
- Blockwork
- Tunnel fit-out
- Linewide deliveries and concrete pours to the tunnel.

Orchard Hills Station (OHE):

- Station box form reo pour (FRP)
- Concrete batch plant operations and decommissioning works
- Blockwork and structural steel installation
- Tunnel fit-out
- Cladding installation.

Luddenham Station (LUD):

- FRP above-ground works
- Stormwater line installation
- Cladding installation of station walls
- Station back-of-house fit-out works.

Bradfield Station (BRD):

- Beam and plank installation
- Internal blockwork
- North and South Services buildings under construction
- Innovation East stormwater pipe installation and earthworks
- Hardstand removal works
- Preparation for Central Park levels has commenced.

LINEWIDE

Stabling and Maintenance Facility (SMF):

- Earthworks for Stockpile PS-102 and utilities
- Sub-station internal fit-out
- Delivery of materials
- Permanent drainage works and the construction of permanent basins
- Combined service route (CSR) works
- Internal fit-out and external finishes of the Maintenance and Administration (M&A) and Operations Control Centre (OCC) buildings
- Construction of the train wash and security gate buildings
- Topsoil import and placement

- Overhead wiring.

Claremont Meadows Services Facility (CMSF):

- Tunnel fit-out works (cable pulling and Mechanical, Electrical and Plumbing (MEP) works)
- Exhaust fan decommissioning
- Shaft lid installation commenced.

Bringelly Services Facility (BSF):

- Tunnel fit-out works (cable pulling and Mechanical, Electrical and Plumbing (MEP) works).

Lansdowne Road to Luddenham Station (Linewide North):

- CSR works
- Galvanised steel trough (GST) installation
- Track construction works ongoing (concrete pours), standard hours
- Bridge 2 (Blaxland Creek) FRP works completed
- Bridge 1 (Unnamed Tributary) FRP works
- Accessible Transport Corridor (ATC) construction (on hold)
- Permanent drainage construction
- Utility installation (lighting)
- Fencing works.

Linewide Luddenham Road to M12:

- Hi-Rail supporting pole and electrical installation
- Maintenance Path Cosgrove Creek crossing construction pending installation of precast slabs
- CSR/GST work
- Utility installation (lighting)
- Preparation for concrete pour to construct emergency stair slab).

Linewide M12 to Elizabeth Drive:

- Hi-Rail supporting pole and electrical installation
- Topsoil stockpiling.

Project-wide:

- Weed spraying and slashing ongoing across the alignment.

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. IA6 covers the period from 9th February 2026 to 3rd August 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 SSTOM, as identified in Appendix A of the Staging Report;
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
    - actual impacts compared to predicted impacts documented in the environmental impact assessment;
    - the physical extent of the development in comparison with the approved boundary;
    - incidents, non-compliances and complaints that occurred or were made during the audit period;
    - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
    - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

The audit commenced with a site inspection on 3rd August 2026 and pertains to post-approval requirements and compliance during Construction of the following stages:

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

1.4 Audit Team and Auditor Approval

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

Table 1 presents the audit team for SM-WSA SSTOM IA6.

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 8th July 2026. 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: 2026 Environmental Management Systems
- AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems

2.1 Audit Planning and Scope Development

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

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

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

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

2.1.1 Agency Consultation

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

The NSW Department of Planning, Housing and Infrastructure (DPHI), NSW Environment Protection Authority (EPA), Penrith and Liverpool City Councils were consulted via email on 9th July 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 9th July 2026. No response was received from DPHI.	N/A
NSW EPA	Scope consultation correspondence was issued to NSW EPA on 9th July 2026. EPA responded on 14th July 2026 as follows: *"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".* • *Condition E134 – Groundwater Modelling Report – whether saline groundwater intersection at the Stabling and Maintenance Facility site has been updated in the Groundwater Modelling Report.*	Refer to Audit Table, **Condition E128** for findings in relation to erosion and sediment controls. Overall, ERSED risks were being managed well, with Progressive ESCPs prepared and implemented, and there were no opportunities for improvement raised in relation to ERSED after the site inspection conducted on 3/8/2026. In relation to actual vs predicted surface water impacts, it is noted that a minor amendment to the Soil and Water Management Plan was approved by the ER during the IA audit period after a review of the surface water quality monitoring program and included changes to the number and location of surface water monitoring points with the objective of providing more meaningful and targeted data. Refer to the Audit Table, **Condition C14** for details. The project has interpreted that **Condition E134** is "*principally tailored to the bulk earthworks contractor and, in particular, the SBT scope, with the requirements referring to groundwater drawdown associated with station sites and excavation activities such as station box excavations and tunnelling*". PLM advised there has been no bulk excavation or tunnelling conducted as part of their scope of works, and the condition requires a groundwater modelling report to be submitted prior to the commencement of bulk earthworks. It is understood that Sydney Metro and PLM have discussed the intent of Condition E134 and determined that an additional Groundwater Modelling Report is not required for the PLM scope. The identification of saline groundwater at the SMF during the IA6 audit period has not changed the above position held by PLM and Sydney Metro. PLM advised "*The groundwater encountered within the PLM surface works area at SMF is being managed under Condition E130, which addresses the management of groundwater encountered during construction. The groundwater interface and associated water quality considerations are also being actively*

Stakeholder	Key Issues	How Addressed including Section Reference
		managed through the Water Discharge Impact Assessment (WDIA) process. Sydney Metro and the EPA were notified of the saline groundwater issue, and the EPA is actively involved in the ongoing WDIA process. The WDIA is considering the groundwater/water quality characteristics and the proposed management and discharge arrangements associated with the SMF, including the relevant water quality risks". Refer to the Audit Table, **Condition E134** for details.
Liverpool City Council	Scope consultation correspondence was issued to Liverpool City Council (LCC) on 9th July 2026. No response was received from LCC.	N/A
Penrith City Council	Scope consultation correspondence issued to Penrith City Council on 9th July 2026. PCC responded by phone on 31st July 2026 and discussed general parking and traffic arrangements around St Mary's Station. No formal response was received.	Refer Conditions E103-E119 in the Audit Table, Appendix 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	Environment Manager Western Sydney Airport Project Delivery	[redacted]	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
Sydney Metro	A/Senior Manager – Environment | Western Sydney Airport	[redacted]	Administration of audit process
Sydney Metro	Senior Manager – Environment | Western Sydney Airport	[redacted]	Closing meeting
PLM	Senior Environmental Advisor	[redacted]	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
PLM	Environmental Advisor	[redacted]	Opening & Closing meetings, Site inspection, Interviews & provision of evidence
WeBuild	Leading Hand	[redacted]	Site inspection St Mary's Station
WeBuild	Leading Hand	[redacted]	Site inspection St Mary's Station
PLM	Site Supervisor	[redacted]	Site inspection Orchard Hills Station
HBI	Environmental Representative	[redacted]	Interview

2.3 Site Inspection and Meetings

The site inspection, opening and closing meetings were held with Project personnel as identified in **Table 3**. The site inspection was conducted on 3rd August 2026 and covered the following areas:

- Linewide Portion 1
- Linewide Portion 4
- Orchard Hills Station
- Claremont Meadows Service Facility
- St Mary's Station.

NB: *The scope of the site inspection sites was approved by DPHI during consultation for IA6, with a focus agreed on the northern sites for the IA5 audit period.*

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

The opening meeting was held on site on 3rd August 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 PLM on 14th September 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:

- Environmental Representative: 7th August 2026
- PLM & Sydney Metro: 3rd August 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 are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

2.6.2 Review

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

3. LIMITATIONS

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

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

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

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

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

4. AUDIT FINDINGS

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

4.1 Approvals and documents audited, and evidence sighted

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

- ParkLife Metro SSTOM Construction Environment Management Plan (CEMP), Rev 03 19/12/2025
- ParkLife Metro SSTOM Air Quality Management Sub Plan (AQMP), Rev 03, 10/12/2025
- ParkLife Metro SSTOM Construction Traffic Management Plan (CTMP) Orchard Hills Station, Rev02, dated 11/6/2024
- ParkLife Metro SSTOM Construction Traffic Management Plan (CTMP) St Marys Station, Rev01, dated 3/4/2024
- ParkLife Metro SSTOM Flora and Fauna Management Sub Plan (FFMP), Rev 04, 12/11/2025
- ParkLife Metro SSTOM Noise and Vibration Management Sub-plan (NVMP), Rev 04, 13/11/2025
- ParkLife Metro SSTOM Non-Aboriginal Heritage Management Sub Plan (NAHMP), Rev 03, 1/12/2025
- ParkLife Metro SSTOM Soil and Water Management Sub Plan (SWMP), Rev 05.01, 17/2/2026
- ParkLife Metro SSTOM Visual Amenity Management Sub Plan (VAMP), Rev 01, 17/12/2024
- ParkLife Metro SSTOM Waste Management Sub Plan (WMP), Rev 03, 3/12/2025
- ParkLife Metro SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026
- ParkLife Metro SSTOM - Surface Water Construction Monitoring Report 3 August 2025-July 2025 Rev 01, dated 7/11/2025
- ParkLife Metro SSTOM Air Quality Construction Monitoring Report 2 August 2024-July 2025 Rev 01, dated 7/11/2025
- ParkLife Metro SSTOM Groundwater Construction Monitoring Report 4 July 2025-Feb 2026 Rev00, dated 30/4/2026
- ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807
- ParkLife Metro SSTOM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023
- ParkLife Metro Project website: https://parklifemetro.com.au/project/
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide Portion 4, Rev05, dated 11/5/2026
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Linewide North, Rev12, dated 27/7/2026
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), St. Marys, Rev07, dated 2/4/2024
- SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills Station Rev17, dated 13/7/2026
- Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF Ver 2, 9/12/2024

- Sydney Metro Western Sydney Airport Environmental Impact Statement (WSA EIS), dated October 2020) (the EIS)
- Sydney Metro Western Sydney Airport Submissions Report, submitted April 2021
- Sydney Metro Western Sydney Airport Response to Submissions Report (RtS), dated December 2020
- Sydney Metro Western Sydney Airport Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022
- Sydney Metro Western Sydney Airport Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022
- Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57, correspondence dated 12 August 2024
- Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024
- Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1 June 2026
- Sydney Metro Project website: https://www.sydneymetro.info/documents
- SM-WSA Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024
- SM-WSA SSTOM Complaints Report, February-August 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 v3.0, dated 26/5/2022
- SM-WSA Sustainability Plan, January 2022
- SM-WSA Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024
- SM-WSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022
- SM-WSA Construction Water Discharge Impact Assessment – Stabling Yard and Maintenance Facility (SMF), Tetra Tech Coffey, dated 7/7/2026
- Construction Worker Car Parking Strategy, St Marys Station Rev1, dated 28/5/2026
- SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/20222
- Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023 (St Marys Station)
- Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. Consent No. 53823, dated 8/1/2025 (Claremont Meadows Service Facility).

4.2 Non-Compliances, Observations and Actions

This Section presents findings from the 6th Independent Audit (IA6). A summary of the number of conditions assessed and compliance status from IA6 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	**35**	0	12	0
Part B	11	**7**	0	4	0
Part C	22	**21**	**2**[1]	0	**1**
Part D	8	0	0	8	0
Part E	134	**79**	0	55	**1**
TOTAL	**222**	**142**	**2**	**79**	**2**

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

A summary of findings from IA6 has been presented in **Table 6**. Positive observations are discussed in **Section 4.7**.

Findings from the previous Independent Audit (IA5) were also reviewed. The Auditor was satisfied that all findings from IA5 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 (IA5) are presented in **Table 7**.

[1] There were 2 NCs raised against Condition C10 during the audit period

Table 6: Summary of Compliance Status – IA6 (3 August 2026)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
NON-COMPLIANCES					
Nil					
SELF-REPORTED NON-COMPLIANCES					
IA6-NC01	**C10**	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	NCR 018 (27/3/2026): **Condition C10** Following review of evidence provided by PLM, on 27/3/2026, the ER identified a non-compliance against **CoA C10** as commitments made in the SWMP (namely sampling as per REMM SC7 and REMM SC8), were not implemented prior to ground disturbance in and adjacent to Blaxland Creek riparian zone and Cosgroves Creek (risk areas for ASS and high salinity potential), during construction of the Active Transport Corridor. Notification of the NC to DPHI was on 31/3/2026, within the required 7-day timeframe. Refer also to **Condition A44**.	The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed-out internally.	**Responsible Person: N/A** **Due Date: N/A** **Status: CLOSED**
IA6-NC02			NCR 019 (22/4/2026): **Condition C10** On 22 April 2026, a vehicle was observed parked within the designated Tree Protection Zone (TPZ) at the SMF car park. Flagging delineation controls were noted to be partially compromised, however, it is unclear whether this occurred prior to or following the vehicle's entry into the no-go zone. TPZ controls were confirmed to be in	The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed-out internally.	**Responsible Person: N/A** **Due Date: N/A** **Status: CLOSED**

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	RESPONSIBLE PERSON, DUE DATE & STATUS
			place during the previous environmental inspection undertaken on 16 April 2026. 'TPZ – No Access' requirements continue to be communicated via environmental notice boards at the SMF and reinforced through refresher toolbox talks. Notification of the NC to DPHI was on 24/4/2026, within the required 7-day timeframe. Refer also to **Condition A44**.		
OBSERVATIONS					
OBS01	**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.	SSTOM Noise & Vibration Construction Monitoring Report 5 was submitted to Liverpool and Penrith Councils outside the required six-monthly period on 20/7/2026. The reports were due for submission by 10/5/2026 as per the six-monthly frequency set in the CMP. There was no evidence of submission of CMR 5 to NSW EPA.	Ensure future CMRs are submitted to relevant regulatory agencies and are submitted as per the frequency documented in the Construction Monitoring Program.	**Responsible Person: PLM Environment Manager** **Due Date: To be verified during IA7** **Status: OPEN**
OBS02	**E58**	The Proponent must prepare an Operational Noise and Vibration Review (ONVR) to confirm noise and vibration mitigation measures that would be implemented for the Operation of the CSSI for the ultimate service. **The ONVR must be verified by an independent acoustic expert and submitted to the Planning Secretary for approval before the implementation of any operational noise mitigation measures.**	The Renzo Tonin Independent Verification Certificate, Appendix K of the ONVR, is dated 30/10/2024, almost 2 years prior to the ONVR being prepared on 10/3/2026.	The Proponent should consider updating the Renzo Tonin Independent Verification Certificate, Appendix K of the ONVR, dated 30/10/2024 to ensure the verification relates to the latest version of the ONVR.	**Responsible Person: SM-WSA Senior Environment Manager** **Due Date: N/A** **Status: CLOSED**

Table 7: Review of previous audit findings – IA5 (11 February 2026)

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
NON-COMPLIANCES					
IA5-NC01	**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.	NCR 015 was notified to the Planning Secretary outside of the required 7-day timeframe. NCR 015 was identified on 2/12/2025 and notified to the Planning Secretary on 16/12/2025 (14 Days).	Ensure future NCs are notified in writing to the Planning Secretary within the timeframe required by **Condition A44**. Nil The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed-out internally.	**Responsible Person:** Sydney Metro Environment Manager **Due Date:** Ongoing. To be verified during IA6. **Status:** CLOSED **Proponent's Response:** Sydney Metro will ensure as the Proponent that all non-compliance reports are submitted as per A45. **N/A CLOSED** *No further actions or recommendations are considered necessary.*
SELF-REPORTED NON-COMPLIANCES					
IA5-NC02	**C10**	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (whichever is applicable), unless otherwise agreed by the Planning Secretary. The CEMP and CEMP Sub-plans, as approved by the Planning Secretary or endorsed by the ER (whichever is applicable), including any minor amendments approved by the ER, must be implemented for the duration of construction.	NCR 015 (2/12/2025): Condition C10 BRD A concrete washout overflow occurred in two locations and concrete slurry flowed to the edge of the bund. The incident occurred due to a lack of capacity and a delay during a tunnel pour which meant the concrete in waiting trucks needed to be disposed as slump requirements would not be met. The spill was cleaned up and additional washout trays provided to prevent overflow. PLM advised frequent checks of washout capacity will be carried out by both the Linewide and Station	The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed-out internally. Nil	**N/A CLOSED** *No further actions or recommendations are considered necessary.*

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
			Supervisors when undertaking concrete works. Concrete wash outs are discussed at each mornings tool box talks and the issue has been escalated project wide with all Supervisors, Engineers, Superintendents and concrete provider Boral aware of the management requirements associated with waste concrete. Notification of the NC to DPHI was on 16/2/2025, outside of the required 7-day timeframe.		
IA5-NC03	**C10**		NCR 016 (11/12/2025): Condition C10 The replacement of deteriorated banner mesh around PLM ancillary facilities was not completed within a practicable timeframe. Photos of newly installed banner mesh at CLM, LDN and OHE were presented during the audit. Notification of the NC to DPHI was on 17/12/2025, 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. Nil	**N/A CLOSED** *No further actions or recommendations are considered necessary.*
IA5-NC04	**E38**	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.	NCR 014 (22/9/2025): Condition E38 SMF. PLM received two separate complaints on Sunday 21/9/2025 at 09:20am and 10:00am with regards to works occurring at the SMF. A front-end loader was rail pulling within the SMF outside standard construction hours and without an approved OOH permit. Upon investigation it was found the activity occurred from 6:52am to	Continue to regularly communicate allowable working hours and educate the site team on circumstances under which an out of hours work approval is required.	**Responsible Person:** PLM Project Manager **Due Date:** Ongoing. To be verified during IA6. **Status:** CLOSED **Proponent's Response:** PLM will continue to ensure the construction workforce are continually communicated to in regard to standard working hours

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
			10:04am. Notification of the NC to DPHI was on 29/9/2025, within the required 7-day timeframe. PLM delivered a toolbox to the SMF team on compliance obligations around construction hours and OOH permits at the next pre-start meeting.		as well as approved out of works across the project. **N/A CLOSED** *No further actions or recommendations are considered necessary.*
IA5-NC05	**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.	NCR 017 (15/12/2025): Condition E109 STM. Construction Worker Car Parking Strategy – St Marys Station. Notification of the NC to DPHI was on 19/12/2025, within the required 7-day timeframe.	No alternate parking locations for St Mary's station workers have been identified to date. It is recommended that further investigation into alternate parking locations is undertaken to reduce the risk of a long-term NC with **Condition E109**. Ongoing consultation with PCC is also recommended to help ensure a suitable solution to worker parking issues is achieved.	**Responsible Person:** PLM Project Manager **Due Date:** Ongoing. To be verified during IA6. **Status:** CLOSED **Proponent's Response:** A revised Construction Worker Car Parking Strategy – St Marys Station is currently with PCC for consultation. Post feedback from Council, the finalised strategy will be provided to DPHI as requested. **N/A CLOSED** *No further actions or recommendations are considered necessary.*
OBSERVATIONS					
IA5-OBS1	**E1**	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	Wheel washes consisting of a depression in the ground filled with water were in use at the SMF. The water inside the pits was muddy/dirty which increases the risk of mud and sediment tracking	The use of this type of wheel wash should be monitored to ensure the dirty water is contained in a closed system; Water is periodically removed and disposed of properly; and that there is no discharge to	**Responsible Person:** PLM Project Manager **Due Date:** Ongoing. To be verified during IA6. **Status:** CLOSED

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
			onto public roads. It is noted that there was no overflow observed and the water appeared to be mostly contained.	stormwater drains or waterways.	**Proponent's Response:** PLM monitor all controls during weekly environmental inspections and will continue to monitor the wheel wash to ensure the dirty water is contained in a closed system; water is periodically removed and disposed of properly; and that there is no discharge to stormwater drains or waterways. A new self-contained recycled water wheel wash was being installed at the time of IA6. **N/A CLOSED** *No further actions or recommendations are considered necessary.*
IA5-OBS2	**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.	A formal record of pre-clearance inspections undertaken for each site (i.e. Portion 1 Blaxland Creek, Cosgrove Creek and Portion 3 South of Patons Lane) was not documented within or attached to the WolfPeak Post-clearance inspection report. The WolfPeak Post-clearance inspection report states tree clearing commenced on 2/12/2026, where the Tree Removal Permit for Cosgrove Creek was issued on 3/12/2026, after the stated commencement of clearing.	Update the Post-clearance Report for Portion 1 Blaxland Creek, Cosgrove Creek and Portion 3 South of Patons Lane, dated 5/1/2026 to accurately reflect the timing of pre-clearance inspections and tree removal works for each site, to confirm that pre-clearance inspections were undertaken within 48 hours of tree removal commencing. Conduct a review of all pre- and post- clearance reports to ensure the required information has been documented including: Date of the pre-clearance inspection & findings;	**Responsible Person:** PLM Project Manager **Due Date:** Prior to IA6. **Status:** CLOSED **Proponent's Response:** PLM provided evidence to the auditor on 19/3/2026 confirming that pre-clearance inspections were Undertaken prior to clearing activities and will update the post-clearing report to accurately reflect the timing of preclearance inspections and tree removal works for each site. PLM will ensure all future reports include

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
				Record of tree removal permit; Date of tree removal; Date of the post-clearance inspection and findings.	required details. **N/A CLOSED** *No further actions or recommendations are considered necessary.*
IA5-OBS3	**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 *Protection of the Environment Operations (Waste) Regulation 2014*, as the case may be.	The Material Import Registers don't specify the source location of the import material. While the source location is noted in other columns, e.g. Luddenham Operations & Sydney Metro West, the source of the topsoil imported to the SMF can't be determined from the Material Import Registers alone.	Update the Material Import Register to specify the source location of all material imported to site, including topsoil.	**Responsible Person:** PLM Project Manager **Due Date:** Prior to IA6 **Status:** CLOSED **Proponent's Response:** Source locations are linked through reference of waste classification within the register. PLM Material Tracking registers will be updated to include source locations. **N/A CLOSED** *No further actions or recommendations are considered necessary.*
IA5-OBS4	**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.	The ESCP for Cosgrove Creek is difficult to read. The waterway itself is not well defined and the aerial imagery in the background doesn't provide an accurate reflection of site conditions including: creek banks, existing vegetation and areas of vegetation removed. The ESCP shows silt curtains are required on either side of the creek but were not in place during the site inspection. A hydrocarbon boom was in place during the site inspection (and required as part of	Review the Cosgrove Creek ESCP and update to reflect the requirements of the EWMS; ensure controls are placed in the correct location. A clearer aerial image as background may be helpful in illustrating the location and type of required controls.	**Responsible Person:** PLM Project Manager **Due Date:** Within 5 Days **Status:** CLOSED **Proponent's Response:** Sydney Metro WSA - SSTOM –Linewide - Portion 3 – Luddenham Road South to Elizabeth Drive Erosion and Sediment Control Plan SMWSASSM-PLD-SWD-SW000-EVPLN-000001 Rev 3 dated 25/03/2026 has been provided to the Auditor on 27/03/2026.

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	IA4 ASSESSMENT & STATUS
			the EWMS) but is not illustrated on the ESCP. Geofabric lining was in place over the piling pad side of the creek bank during the inspection but was not reflected on the ESCP.		**N/A CLOSED** *No further actions or recommendations are considered necessary.*

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 are of high quality. The evidence reviewed and/or sighted during this Independent Audit indicates that these documents are being implemented; with no non-compliances raised against the mitigations measures within.

4.4 Complaints

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

Complaints within the reporting period that have been attributed to the project have reduced significantly since the IA5 audit period. During the IA6 reporting period a total of 12 complaints were received, two of which were deemed applicable to SSTOM. The topic of complaints received that were related to the project included:

- Complaint received regarding workers parking on local streets, blocking parking for residents and a business.
- Resident reported being disturbed by construction noise over a long period of time. The complainant is experiencing general construction fatigue due to the ongoing nature of works. SSTOM confirmed works were compliant with OOHW approvals.

It is noted that there have been no repeat complaints or complainants during the IA6 audit period, with evidence of complaints received being investigated and closed-out with actions to reduce further impact implemented.

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

4.4.1 Cumulative Impacts

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

Potential remains for cumulative impacts from SSTOM with other nearby project sites. Cumulative impact assessments are undertaken by PLM during OOH works planning. Refer to noise conditions for more information.

It is noted that a decrease in the number of complaints received by the project aligns with a reduction in the amount of out of hours work being undertaken. For example, at St Mary's Station, out of hours work for beam delivery concrete pours have not been utilised as frequently during the audit period and works associated with the neighbouring SM-WSA Footbridge St Marys (FSM) project site have also decreased.

Cumulative impacts from interfaces and other nearby construction sites have historically been managed through monthly Cumulative Impact Meetings. Sydney Metro undertakes periodic meetings with surrounding projects, including Bradfield Delivery Authority (BDA) and the FAW_FSM project at St Marys.

BDA meetings are attended by PLM, Sydney Metro, and WEM Civil (the BDA Principal Contractor) during which cumulative impacts are discussed. Outcomes of both meetings are referenced and discussed as appropriate within fortnightly formal Environmental Working Group minutes or in informal discussions with PLM.

Monthly PLM delivery interface (Cumulative Impact) meetings are minuted and include attendees from Sydney Metro, SSTOM and FAW_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.

Traffic and access impacts reduced with the completion of SCAW and SBT import and tunnelling works, which resulted in significant improvements to surface water quality, dust emissions, and noise and vibration impacts.

Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project, particularly with utility works scheduled to commence in the St Marys precinct in mid-late 2026.

4.5 Incidents and Non-Compliances

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

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

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

4.6 Actual vs Predicted Impacts

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

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

Qualitative assessment findings are summarised below:

- Two Consistency Assessments (CAs) and one Environmental Review was determined by Sydney Metro during the audit period and have been considered during the audit (refer **Section 1.1.3** for details). The proposed changes were deemed to be consistent with the EIS and Submissions Report.
- Refer to **Section 4.5** for incidents and non-compliances recorded within the audit period.
- Refer to **Section 4.4** for complaints recorded within the audit period.
- Compliance with the project approval is tracked on an ongoing basis by the Sydney Metro and Contractor Environment Teams. Compliance tracking at a high level is included in a Compliance Tracking Register. The ER has also been engaged and provides support in the management of compliance with the planning approval and reports monthly to DPHI as required. The project prepared the 5th Six-Monthly Noise and Vibration Monitoring Report, covering the period up to February 2026. The project prepared the 4th Groundwater CMR, also covering the period up to February 2026. Surface water and Air quality CMRs are scheduled to be prepared and reviewed during the next audit period.
- The Auditor consulted with DPHI, NSW EPA, Liverpool and Penrith City Councils on 8th July 2026 to obtain input on the scope of the Independent Audit in accordance with Section 3.2 of the IAPAR.

  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**:

- There have been no repeat complaints or complainants during the IA6 audit period, and complaints regarding worker parking around St Marys station that had spiked during the IA5 audit period, had reduced significantly, indicating a proactive and effective approach to complaints management by the project team.
- Process in place for the management of potential cumulative impacts from other SM-WSA projects operating concurrently with SSTOM. This includes the management of traffic and heavy vehicle movements across the project.
- Reduced ERSED risks across the project and proactive methodology including street sweeping, wheel washing and widespread stabilisation of batters with polymer.
- Controls in place and maintained at creek crossings.

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 10th Independent Audit conducted for the SM-WSA project, and the 6th IEA conducted for SSTOM, covering the period from 3rd February to 11th August 2026.

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

There were no other matters considered relevant by the auditor.

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

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

6. SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

ST MARY'S STATION

The following activities were being undertaken at the time of the audit: Level B2 electrical and services fit-out; Steel fixing (TSG) & Formwork (BKH); Hoist extension and works to the Eastern Services Building; Linewide works on B4 track; Backfill of old tower crane (Conno); Water Treatment Plant operation and discharge to trade waste.



Photo 1: Signage in place prohibiting parking on streets as per the Worker Parking Strategy



Photo 2: Drain protection in place





Photos 3&4: St Mary's Goods Shed – area of future works and archaeological investigation



Photo 5: Jib crane – to be relocated later in the project



Photo 6: Materials storage



Photo 7: Noise blankets in place between site and adjacent receivers



Photo 8: Site access clear and clean

CLAREMONT MEADOWS SERVICE FACILITY

Limited activity on site with the site preparing for backfill and decommissioning.



Photo 9: Concrete washout bay lined and contained



Photo 10: Tree protection zone and swales in place





Photos 11&12: Water Treatment Plant (WTP) operational and chemicals bunded and labelled





Photos 11&12: WTP settling tank and holding basin prior to discharge to sewer under a Trade Waste Agreement (TWA)



Photo 13: Vents fans removed from services shaft and crane demobilised. Shaft lidded and planned to be backfilled before returning land back to TfNSW. Noise mats in place along boundary with Gipps Street and no complaints received.

ORCHARD HILLS STATION

Activity on site including demolition saw cutting out penetration; Sorting concrete stockpile; Concrete batching plant decommissioned; Electrical fit-out on B01-B02; Trackwork and overhead wiring; Retaining wall construction. Civil works yet to commence.





Photos 14&15: Concrete stockpile being sorted. Crushed concrete for reuse on site for service trenches and backfill. Some material has been reused at Bradfield Station under an RR and s143 certificate.





Photos 16&17: Standpipe in place for the sediment basin with water reused for dust suppression or pumped to Claremont Meadows WTP. Controls in place to filter runoff prior to entry to the basin. Weed management ongoing



Photo 18: Bunded area for future stockpiling of spoil associated with the Samuel Marsden Drive sewer works



Photo 19: Retaining wall construction underway. One tree was pruned and waste from the adjacent land is being removed under a Consistency Assessment.



Photo 20: Wheel wash in place at site exit



Photo 21: Concrete batching plant decommissioned and due for demobilisation in mid-August



Photo 22: Northern Services Building





Photos 23 & 24: Flammable gases were secured within a labelled cage. A diesel cell was in place on hardstand for refuelling and spill kits were located nearby.

LINWIDE PORTION 1

Rail construction, overhead wiring and security fencing works ongoing; Concrete washout being emptied for load-out; Construction of Bridges 1 and 2 over Blaxland Creek.



Photo 25: Concrete washout being emptied for load-out



Photo 26: Swale in place and base lined with geofabric and polymer applied









Photos 27-30: Construction of Bridge 2 over Blaxland Creek was underway in accordance with the Erosion and Sediment Control Plan (ESCP) and Environmental Work Method Statement (EWMS) for Working in Waterways.







Photos 30-32: Construction of Bridge 1 over Blaxland Creek was underway in accordance with the Erosion and Sediment Control Plan (ESCP) and Environmental Work Method Statement (EWMS) for Working in Waterways.





Photos 33&34: Land in the vicinity of the viaduct.





Photo 35&36: Stabilised site access and sweeper in use along public access road.

LINEWIDE PORTION 4

Activity on site was limited.



Photo 37: Planned security fence installation area with disturbed soil stabilised with polymer.

Independent Environmental Audit Report

Sydney Metro

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

Attachment 1: Independent Audit Table

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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.**	• 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 (RtS), dated December 2020 • Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1) Modification Assessment Report, DPHI 2022 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 1), determined 14 April 2022 • Sydney Metro – Western Sydney Airport, SSI-10051, Request for Modification to Conditions E13 and E57, correspondence dated 12 August 2024 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • Consistency Assessment - PLM CA001 Samuel Marsden Road Sewer main – revised underbore alignment and tree removal Draft Rev 1.0, dated 25/2/2026 • Consistency Assessment - PLM CA002 Patons Lane - Revised construction footprint Final, dated 25/6/2026 • Environmental Review - ER009 Orchard Hills Station Utility and Precinct Works Final, dated 15/7/2026 • Environmental Review - ER010 St Marys Nariel Street Geotechnical Investigations Final, dated 24/7/2026	**C**	As per the findings from this audit, including any Non-Compliances and Observations raised throughout. Refer also to the review of the Sydney Metro WSA Modification 1 – Biodiversity Credits (SSI-10051-MOD-1), SSI-10051-MOD-2, corresponding Modification Assessment Reports, as well as Consistency Assessments and Environmental Reviews prepared during the audit period in the body of the audit report. SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends **Condition E4** to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends **Condition E13** to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. There were two **Consistency Assessments** (CAs) prepared and approved during the audit period: • **Consistency Assessment - PLM CA001** was prepared to assess consistency with the EIS for proposed project changes at Orchard Hills Station which includes a new proposed underbore alignment between Samuel Marsden Road to the existing Sydney Water submain sewer main to minimise tree removal. The new alignment: • Removes one maintenance hole on Samuel Marsden Road • Relocates the underbore entry pit, reducing the length of trenching along Samuel Marsden Road by approximately 55m. • Requires removal of two trees to allow connection to the existing Sydney Water sewer sub-main. • Provides allowance for an intermediate pit/s along the underbore alignment in locations where vegetation removal is not required. • Requires geotechnical testing prior to construction to confirm subsurface conditions and detailed construction methodology. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 25th February 2026. • **Consistency Assessment - PLM CA002** was prepared to assess consistency with the EIS for proposed project changes at the SMF site including road work required to tie-in the permanent SMF access road to the north verge of Patons Lane including minor grading and pavement work over a distance of approximately 35m east of the existing project boundary. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 25th June 2026. There were two Environmental Reviews prepared and approved during the audit period: • **Environmental Review - ER009** was prepared to assess consistency with the EIS to connect new utility work with existing services at Orchard Hills Station, located outside the approved SM-WSA Project boundary. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 15th July 2026. • **Environmental Review - ER010** was prepared to assess consistency with the EIS to conduct geotechnical investigations for the Nariel Street Temporary Bus Interchange (TBI) at St Marys, located outside the approved SM-WSA Project boundary. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 24th July 2026.
A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in **Condition A1** unless otherwise specified in, or required under, this approval.	• Refer evidence throughout this audit table	**C**	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in **Condition A1** inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in **Condition A1** inclusive, the most recent document will prevail to the extent of the inconsistency. **Note:** *For the purpose of this condition, there will be an inconsistency between a term of this approval and any document if it is not possible to comply with both the term and the document.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 • Consistency Assessment - PLM CA001 Samuel Marsden Road Sewer main – revised underbore alignment and tree removal Draft Rev 1.0, dated 25/2/2026 • Consistency Assessment - PLM CA002 Patons Lane - Revised construction footprint Final, dated 25/6/2026 • Environmental Review - ER009 Orchard Hills Station Utility and Precinct Works Final, dated 15/7/2026 • Environmental Review - ER010 St Marys Nariel Street Geotechnical Investigations Final, dated 24/7/2026	C	SSI-10051-Modification 1 (MOD 1) was approved on 14th April 2022 and amends **Condition E4** to reduce the biodiversity offset credit requirement. SSI-10051-Modification 2 (MOD 2) was approved on 20th December 2024 and amends **Condition E13** to provide clarity around: timing of tree survey information and decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Secretary on request. Potential inconsistencies were assessed by the Consistency Assessment (CA) and Environmental Review process. There were two Consistency Assessments (CAs) prepared and approved during the audit period: • **Consistency Assessment - PLM CA001** was prepared to assess consistency with the EIS for proposed project changes at Orchard Hills Station which includes a new proposed underbore alignment between Samuel Marsden Road to the existing Sydney Water submain sewer main to minimise tree removal. The new alignment: • Removes one maintenance hole on Samuel Marsden Road • Relocates the underbore entry pit, reducing the length of trenching along Samuel Marsden Road by approximately 55m. • Requires removal of two trees to allow connection to the existing Sydney Water sewer sub-main. • Provides allowance for an intermediate pit/s along the underbore alignment in locations where vegetation removal is not required. • Requires geotechnical testing prior to construction to confirm subsurface conditions and detailed construction methodology. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 25th February 2026. • **Consistency Assessment - PLM CA002** was prepared to assess consistency with the EIS for proposed project changes at the SMF site including road work required to tie-in the permanent SMF access road to the north verge of Patons Lane including minor grading and pavement work over a distance of approximately 35m east of the existing project boundary. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 25th June 2026. There were two Environmental Reviews prepared and approved during the audit period: • **Environmental Review - ER009** was prepared to assess consistency with the EIS to connect new utility work with existing services at Orchard Hills Station, located outside the approved SM-WSA Project boundary. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 15th July 2026. • **Environmental Review - ER010** was prepared to assess consistency with the EIS to conduct geotechnical investigations for the Nariel Street Temporary Bus Interchange (TBI) at St Marys, located outside the approved SM-WSA Project boundary. The proposed changes were deemed to be consistent with the EIS and Submissions Report and was approved by Sydney Metro on 24th July 2026.

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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A4	In the event that there are differing interpretations of the conditions of this approval, including in relation to a condition of this approval, the Planning Secretary's interpretation is final.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	There were no differing interpretations of the terms of the approval identified during the project.
A5	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (a) the environmental performance of the CSSI; (b) any document or correspondence in relation to the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval; (d) any audit of the construction or operation of the CSSI; (e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); (f) the carrying out of any additional monitoring or mitigation measures; and (g) in respect of ongoing monitoring and management obligations, compliance with an updated or revised version of a guideline, protocol, Australian Standard or policy required to be complied with under this approval.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	There were no directions known to be 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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026	C	As per conditions requiring consultation throughout this audit table, including in relation to monitoring programs and document review. Monitoring programs have been incorporated into CEMP Sub-plans and were approved by DPHI prior to construction commencement. Updates to CEMP and Sub-plans during the audit period have been deemed minor and approved by the ER.
A7	This approval lapses five (5) years after the date on which it is granted, unless work has physically commenced on or before that date.	• Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023	C	Approval for SSI-10051 was granted on 23/7/2021. Notifications of commencement of Construction were submitted to DPHI (as per **Conditions A34 & A35**) for each stage. The Notification of Commencement of Construction for SSTOM was dated 1/8/2023 for commencement on 8/8/2023 and was issued within the five year commencement period.
A8	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval.	• SSI-10051 Approval, dated 23/7/2021	C	Noted.
A9	Any document that must be submitted or action taken within a timeframe specified in or under the conditions of this approval may be submitted or undertaken within a later timeframe agreed with the Planning Secretary. This condition does not apply to the written notification required in respect of an incident under **Condition A41**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	There were no extension of time requests prepared or submitted to the Department during the audit period.

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Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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 9, 5 May 2023 • ER Endorsement of the SMWSA Staging Report Rev8, dated 28/2/2023 • Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023 • SSI-10051, Independent Audit No.1 – Audit Report (SSTOM only), GHD, April 2024 (WSA IEA Independent Audit No. 5 (IA5), 17/4/2024	C	The initial preparation of the Staging Report, ER Endorsement and Submission was not within the audit period. The initial Independent Environmental Audit (IEA) for STTOM, SM-WSA SSTOM IA1 verified compliance with **Condition A10**. Commencement of Construction for SSTOM was notified to DPHI as 8/8/2023 (in a letter dated 1/8/2023). As verified during IA1, the Staging Report Rev9 was submitted to DPHI via the Major Projects portal prior to commencement of Construction of the SSTOM stage of works.
A11	The **Staging Report** must: (a) set out how construction of the whole of the CSSI will be staged, including details of work and other activities to be carried out in each stage and the general timing of when construction of each stage will commence and finish; (b) if staged operation is proposed, set out how the operation of the whole of the CSSI will be staged, including details of each stage and the general timing of when operation of each stage will commence; (c) specify conditions that apply to each stage of construction and operation including how compliance with conditions will be achieved across and between each of the stages of the CSSI; (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging; and (e) for the purposes of informing **Conditions C2, C7** and **C17**, include an assessment of the predicted level of environmental risk and potential level of community concern posed by the construction activities required to construct each stage of the CSSI. With respect to (e) above, the risk assessment must use an appropriate process consistent with AS/NZS ISO 31000: 2018; Risk Management - Guidelines and must be endorsed by the **ER**. Note: *1. A 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 9, 5 May 2023 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 10, 22 May 2024 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 11, 11 Oct 2024 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 12, 11 Dec 2025 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev8, dated 28/2/2023 • ER Endorsement of SMWSA Staging Report Rev11, dated 11/10/2024 • ER Endorsement of SMWSA Staging Report Rev12, 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 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13)	C	The Staging Report addresses each part (a) - (e) of **Condition A11**, as set out in the Staging Report compliance table, and as verified during the audit, and the allocation of conditions of approval is included in the Staging Report. The allocation of conditions to SSTOM in the latest version of the Staging Report has been used to determine the scope for this audit. ER Endorsement of the Staging Report Rev08 was provided as evidence and included reference to endorsement of the risk assessment associated with the Staging Report as per **Condition A11(e).** The Staging Report was up to Revision 13 on 1/6/2026 to include the correct referencing of inconsistencies related to the Finalisation Auxiliary Works (FAW) stage of the WSA project.
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 V12, 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 • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13)	C	The Staging Report Rev13, dated 1/6/2026 was submitted to DPHI for information on 12/6/2026. The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B 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 13, 1 June 2026	C	SSTOM, and allocation of conditions of approval is included in the Staging Report. The allocation of conditions to SSTOM in the Staging Report Rev13 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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13) • Letter from DPHI RE: Sydney Metro Western Sydney Airport – Staging Report – Revision 13, dated 7/7/2026	C	The Staging Report Rev13, dated 1/6/2026 was submitted to DPHI for information on 12/6/2026. The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B
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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13) • Letter from DPHI RE: Sydney Metro Western Sydney Airport – Staging Report – Revision 13, dated 7/7/2026	C	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report Rev 13 of the Staging Report was updated to include the following: The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B

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Auditee/ Client:	ParkLife Metro / Sydney Metro
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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 13, 1 June 2026 • ER Endorsement of SMWSA Staging Report Rev13, dated 9/6/2026 • Post Approval Form (SSI-10051-PA-736), WSA CSSI 10051 Staging Report (Rev 13) • Letter from DPHI RE: Sydney Metro Western Sydney Airport – Staging Report – Revision 13, dated 7/7/2026	C	Strategies, plans and programs have been submitted as per the SSTOM project described in the Staging Report Rev 13 of the Staging Report was updated to include the following: The Staging Report Revision 13 was revised to include the following: • Correct Footbridge St Marys scope of works from Advanced Enabling Works (AEW) to Finalisation Auxiliary Works (FAW) • Update of a referencing error in Appendix B Refer to Audit Table Part C for submission of CEMP and Sub-plans and timing verification.
ANCILLARY FACILITIES				
Ancillary Facilities				
A17	Ancillary facilities that are not identified by description and location in the documents listed in **Condition A1** can only be established and used in each case if: (a) they are located within or immediately adjacent to the Construction Boundary of the CSSI; and (b) they are not located next to sensitive land use(s) (including where an access road is between the facility and the receiver), unless the landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and (c) they have no impacts on Heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and (d) the establishment and use of the facility can be carried out and managed within the outcomes set out in the terms of this approval, including in relation to environmental, social and economic impacts. ***Note:*** *This condition does not apply to any ancillary facilities or work that are exempt or complying development, established before the commencement of construction under this approval or minor ancillary facilities established under* ***Condition A22****.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025	NT	The following Ancillary Facilities are listed for proposed use in Section 1.5 of the CEMP: • St Marys • Claremont Meadows • Orchard Hills • Stabling and Maintenance Facility • Luddenham Road • Elizabeth Drive • Bringelly • Bradfield • Linewide As per Section 1.7 of the CEMP, "*where the proposed ancillary facility complies with* ***Condition A17****, this CEMP will be updated to include the ancillary facility. In accordance with* ***Condition C3,*** *the revised CEMP will be submitted to the ER for review and endorsement prior to establishment of the respective ancillary facility*". There were no SSTOM A17 Ancillary Facility Assessments approved during the audit period. No **Condition A17** AFs are known to have been established during the project.
SITE ESTABLISHMENT WORK				
Site Establishment Management Plan				
A18	Before establishment of any ancillary facility (excluding exempt or complying development, minor ancillary facilities determined by the ER to have minimal environmental impact and those established under Condition A22 and those considered in an approved CEMP), the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities. The Site Establishment Management Plan must be prepared in consultation with the Relevant Council(s) and relevant government agencies. The Site Establishment Management Plan must include: (a) a description of activities to be undertaken during establishment of the ancillary facility (including scheduling and duration of work to be undertaken at the site); (b) figures illustrating the proposed operational site layout and the location of the closest sensitive land use(s); (c) a program for ongoing analysis of the key environmental risks arising from the site establishment activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of site establishment work; (d) details of how the site establishment activities described in subsection (a) of this condition will be carried out to: (i) meet the performance outcomes stated in the documents listed in Condition A1; and (ii) manage the risks identified in the risk analysis undertaken in subsection (c) of this condition; and (e) a program for monitoring the performance outcomes, including a program for construction noise monitoring, where appropriate or required. Nothing in this condition prevents the Proponent from preparing individual **Site Establishment Management Plans** for each ancillary facility.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Construction Environment Management Plan (CEMP), Rev 03 19/12/2025	NT	There were no Site Establishment Management Plans (SEMPs) prepared for SSTOM under **Condition A18** during the project. Provision for the preparation of SEMPs is included in the CEMP. The following Ancillary Facilities are listed for proposed use in Section 1.5 of the CEMP: • St Marys • Claremont Meadows • Orchard Hills • Stabling and Maintenance Facility • Luddenham Road • Elizabeth Drive • Bringelly • Aerotropolis

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Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A19	With the exception of a **Site Establishment Management Plan** expressly nominated by the Planning Secretary to be endorsed by the **ER**, all **Site Establishment Management Plans** must be submitted to the Planning Secretary for approval one (1) month before the establishment of any ancillary facilities.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	There were no Site Establishment Management Plans prepared for SSTOM under **Condition A18** during the project.
A20	A **Site Establishment Management Plan** expressly nominated by the Planning Secretary to be endorsed by the **ER** must be submitted to the **ER** for endorsement one (1) month before the establishment of that ancillary facility or as otherwise agreed with the **ER**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	There were no Site Establishment Management Plans prepared for SSTOM under **Condition A18** during the project.
Use of Ancillary Facilities				
A21	The use of ancillary facility for construction must not commence until the **CEMP** required by **Condition C1** relevant **CEMP Sub-plans** required by **Condition C5** and relevant **Construction Monitoring Programs** required by **Condition C13** have been approved by the Planning Secretary or endorsed by the **ER** (whichever is applicable). ***Note:*** *This condition does not apply to* ***Condition A22*** *or where the use of an ancillary facility is Low Impact Work or for Low Impact Work.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	C	There were no new construction ancillary facilities approved for use during the audit period, including Minor Ancillary Facilities (MAFs) established under **Condition A21**. Some ancillary facilities proposed for use by SSTOM were established by former SM-WSA Contracts including SCAW and SBT, and in these cases use commenced prior to SSTOM project commencement. No new AFs are known to have been established during the reporting period.
Minor Ancillary Facilities				
A22	Lunch sheds, office sheds, portable toilet facilities and the l ke, can be established and used where they have been assessed in the documents listed in **Condition A1** or satisfy the following criteria: (a) are located within or adjacent to the Construction Boundary; and (b) have been assessed by the **ER** to have - (i) minimal amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the ICNG, traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and (ii) minimal environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and Heritage items beyond those already approved under other terms of this approval.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • Site inspection, 3/8/2026 • PLM SSTOM CEMP Rev03, dated 19/12/2025 • Email from PLM to the ER with updated ECMs, dated 28/1/2025	C	There were no **Condition A22** MAF assessments or due diligence assessments prepared during the audit period. The project has determined that MAFs established to date are located in areas already assessed by the documents listed in **Condition A1** (i.e. within the project boundary and identified as indicative office and amenities locations in the EIS). Maps in the EIS, Chapter 8 Project Description (e.g. Figure 8-11) and Table 8-3 set out indicative office and amenities locations. Assessment by the ER is understood to only be required where agreed that the MAFs have not already been assessed in the EIS or Submissions Report.
Boundary screening				
A23	Boundary screening must be erected around ancillary facilities that are adjacent to sensitive land use(s) for the duration that the ancillary facility is in use unless otherwise agreed with relevant affected residents, business operators or landowners.	• Site inspection, 3/8/2026	C	Sites inspected during the audit (i.e. St Marys and Orchard Hills stations, Linewide Portions 1 & 4 & Claremont Meadows) were predominantly surrounded by hoarding and/or Sydney Metro branding.
A24	Boundary screening required under **Condition A23** must minimise visual impacts on adjacent sensitive land use(s).	• Site inspection, 3/8/2026	C	As per **Condition A23**.
INDEPENDENT APPOINTMENTS				
A25	All **Independent Appointments** required by the terms of this approval must have regard to the Department's guideline *Seeking approval from the Department for the appointment of independent experts* (DPIE, 2020) and hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	• ER Interview, 7/8/2026 • DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	DPHI has approved the independent appointment of the ER for the project. A supporting letter from HBI includes details of ER experience and suitability. The Complaints Mediator (not activated for SSTOM) was appointed previously.
A26	The Planning Secretary may at any time commission an audit of how an **Independent Appointment** has exercised their functions. The Proponent must: (a) facilitate and assist the Planning Secretary in any such audit; and (b) make it a term of their engagement of an **Independent Appointment** that the **Independent Appointment** facilitate and assist the Planning Secretary in any such audit.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	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.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	The auditor is not aware of any formal withdrawals of independent appointments by DPHI during the audit period.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
ENVIRONMENT REPRESENTATIVE				
A28	Work must not commence until an **Environmental Representative (ER)** has been nominated by the Proponent and approved by the Planning Secretary.	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Post Approval Form_20230321040318 (SSI-10051-PA-197), Approval of Additional ER, submitted 21/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A29	The proposed **ER** must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in **Condition A1**, and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it.	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Supporting letter from HBI includes details of ER experience and suitability. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*". Approval of the Initial ER and Alternate ER Appointments was not within the audit period.
A30	The Proponent may engage more than one **ER** for the CSSI, in which case the functions to be exercised by an **ER** under the terms of this approval may be carried out by any **ER** that is approved by the Planning Secretary for the purposes of the CSSI.	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*".
A31	The ER must meet the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).	• DPHI Independent ER Appointment Letter RE: Appointment of Brett McLennan as Environmental Representative – Sydney Metro Western Sydney Airport, dated 24/3/2023 • Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_ WSA, dated 9/3/2022	C	Independent Appointment letter sighted, approved by DPHI on 24/3/2023. Letter notes "*The ERs now approved for this project are: Rui Henriques, Jo Robertson, Alex Gale & Brett McLennan*". Letter from HBI RE: Additional Environmental Representative Resource to PSC No. 00013/11898_ WSA, dated 9/3/2022 includes statements and CV of ER Brett McLennan and supporting evidence of meeting the requirements of the Department's Environmental Representative Protocol (DPHI, 2018).
A32	For the duration of the work until the commencement of operation, or as agreed with the Planning Secretary, the approved **ER** must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents identified in **Conditions A10, A18, A20, C1, C5** and **C13** and any other documents that are identified by the Planning Secretary, to ensure they are consistent with requirements in or under this approval and if so: (i) endorse the documents before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or (ii) endorse the documents before the implementation of such documents (if those documents are only required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary / Department); (iii) provide a written statement to the Planning Secretary advising the documents have been endorsed. (e) for documents that are required to be submitted to the Planning Secretary / Department for information under (d)(ii) above, the documents must be submitted as soon as practicable to the Planning Secretary / Department after endorsement by the ER, unless otherwise agreed by the Planning Secretary; (f) regularly monitor the implementation of the documents listed in **Conditions A10, A18, A20, C1, C5** and **C13** to ensure implementation is being carried out in accordance with the document and the terms of this approval; (g) as may be requested by the Planning Secretary, help plan or attend audits of the development commissioned by the Department including scoping audits, programming audits, briefings and site visits, but not independent environmental audits required under **Condition A36**; (h) as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints received directly by the Department; (i) consider or assess the impacts of minor ancillary facilities as required by **Condition A22**; and (j) consider any minor amendments to be made to the **Site Establishment Management Plan**, **CEMP, CEMP Sub-plans** and construction monitoring programs without increasing impacts to nearby sensitive land use(s), and are consistent with the terms of this approval and the **Site Establishment Management Plan, CEMP, CEMP Sub-plans** and construction monitoring programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the amendment. This does not include any modifications to the terms of this approval; (k) prepare and submit to the Planning Secretary and other relevant regulatory agencies, for information, an **Environmental Representative Monthly Report** providing the information set out in the Environmental Representative Protocol under the heading "Environmental Representative Monthly Reports". The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI or as otherwise agreed by the Planning Secretary; and (l) assess the impacts of activities as required by the **Low Impact Work** definition.	• ER Interview, 7/8/2026 • Sydney Metro WSA ER Monthly Report February 2026, dated 6/3/2026 • DPHI Submission, SM WSA ER_DPHI_February 2026, lodged 6/3/2026 • Sydney Metro WSA ER Monthly Report March 2026, dated 7/4/2026 • DPHI Submission, SM WSA ER_DPHI_March 2026 Final, lodged 7/4/2026 • Sydney Metro WSA ER Monthly Report April 2026, dated 7/5/2026 • DPHI Submission, SM WSA ER_DPHI_April 2026 Final, lodged 7/5/2026 • Sydney Metro WSA ER Monthly Report May 2026, dated 5/6/2026 • DPHI Submission, SM WSA ER_DPHI_May 2026 Final, lodged 5/6/2026 • Sydney Metro WSA ER Monthly Report June 2026, dated 6/7/2026 • DPHI Submission, SM WSA ER_DPHI_June 2026 Final, lodged 7/7/2026 • Sydney Metro WSA SSTOM ER Inspection Reports, dated February (13/2/2026, 17/2/2026), March (10/3/2026, 17/3/2026), April (21/4/2026, 28/4/2026), May (12/5/2026, 19/5/2026), June (16/3/2026, 23/6/2026) & July (14/7/2026, 21/7/2026) • Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1/6/2026 • ER Endorsement Staging Report V13, dated 9/6/2026 • Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER Endorsement of Soil and Water Management Plan Rev 5, letter dated 25/2/2026 • Low Impact (Minor) Works Approval Form – Sydney Metro - Western Sydney Airport, ER Endorsement dated 3/3/2026	C	(a) No formal communication has been received from DPHI requiring ER response within the audit period. (b) The ER provides information to the Planning Secretary predominantly via reports and meetings. ER Monthly Reports include relevant information on incidents, non-compliances and complaints. A monthly meeting with the ER and DPHI is held to discuss environmental issues and concerns. (c) ER recommendations are included in ER Inspection Reports, which are in the form of Corrective Actions and Improvement Opportunities related to environmental management. Monthly project meetings are attended by the ER with Sydney Metro & PLM. The ER also holds informal meetings with PLM fortnightly. (d) Documents reviewed by the ER during the audit period are listed in the ER Monthly Reports. (e) Submission of documents to DPHI after ER endorsement was verified throughout the audit. (f) The implementation of the documents listed in **Conditions A10, C1** and **C13** is predominantly monitored during ER site inspections, which are generally fortnightly (though may be more frequent dependent on the scope of work and associated risk). The implementation of **Condition A18** and **A20** has not been relevant during the audit period. (g) There has been no request made by the Planning Secretary to the ER to assist with audits for SSTOM during the audit period. (h) There has been no request made by the Planning Secretary to the ER to assist in the resolution of community complaints for SSTOM during the audit period. (i) The ER was not required to consider or assess the impacts of minor ancillary facilities as required by **Condition A22** during the audit period. (j) Minor amendments to the documents listed in **Condition A32(j)** have been approved by the ER as required. (k) ER Monthly reports are prepared and submitted to DPHI as required. (l) No low impact works were required to be assessed by the ER during the reporting period for SSTOM. One low impact works approval for bush regeneration and restoration works at Site 4 / PS-105 Stabling and Maintenance Facility (SMF) for the Corridor Restoration Works (CRW) was endorsed by the ER on 3/3/2026. ER inspections are conducted weekly and scheduled to cover all active SM-WSA sites each fortnight. Issues identified by the ER at PLM/SSTOM sites included: Ongoing risks of limited car parking and minimising impacts of street parking at St Marys Station; Stockpile management; ERSED control; Litter; Weed management; and Groundwater. A review of the close-out of representative issues raised by the ER during the audit period were sighted by the auditor with actions confirmed to be closed-out in Evotix.

Item	
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Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A33	The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A32 (including preparation of the ER monthly report), as well as: (a) the Complaints Register (to be provided on a weekly basis or as requested); and (b) a copy of any assessment carried out by the Proponent of whether proposed work is consistent with the approval (which must be provided to the ER before the commencement of the subject work).	• ER Interview, 7/8/2026 • Consistency Assessment - PLM CA001 Samuel Marsden Road Sewer main – revised underbore alignment and tree removal Draft Rev 1.0, dated 25/2/2026 • Consistency Assessment - PLM CA002 Patons Lane - Revised construction footprint Final, dated 25/6/2026 • Environmental Review - ER009 Orchard Hills Station Utility and Precinct Works Final, dated 15/7/2026	C	The ER advised all required information has been provided to them by the Proponent in order for them to undertake their duty, including Complaints Reports (weekly) and monthly complaints summaries. The ER confirmed Consistency Assessments and Environmental Reviews are provided to them for information as required.
NOTIFICATION OF COMMENCEMENT				
A34	The Department, and relevant Councils must be notified in writing of the date of commencement of construction at least seven (7) days before the commencement of construction.	• Sydney Metro Western Sydney Airport - CSSI Staging Report, Rev 13, 1 June 2026 • Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023 • Post Approval Form_20230801014014 (SSI-10051-PA-279), SSTOM Notification of Construction Commencement, 1/8/2023	C	Notification of commencement of Construction for SSTOM was submitted to DPHI on 1/8/2023 for commencement date 8/8/2023, 7 days prior to commencement of Construction.
A35	If construction of the CSSI is to be staged, the Department, Liverpool City Council and Penrith City Council must be notified in writing at least seven (7) days before the commencement of each stage, of the date of the commencement of that stage.	• Email to Liverpool City Council RE: Sydney Metro - WSA: Notification of Commencement of Staged Construction (CoA A35) SSTOM, dated 1/8/2023 • Email to Penrith City Council RE: Sydney Metro - WSA: Notification of Commencement of Staged Construction (CoA A35) SSTOM, dated 1/8/2023	C	Notification of commencement of Construction for SSTOM was submitted to Liverpool City Council and Penrith City Council on 1/8/2023 for commencement date 8/8/2023, 7 days prior to commencement of Construction.
INDEPENDENT ENVIRONMENTAL AUDIT				
A36	**Independent Audits** of the CSSI must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020).	• DPHI Letter, Sydney Metro Western Sydney Airport – Auditor Nomination A38, Ref: SSI-10051-PA-740, dated 8/7/2026	C	This audit (SSTOM IA10 SSI-10051, dated 3/8/2026) 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 (SSTOM IA10 SSI-10051, dated 3/8/2026) • 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 – Auditor Nomination A38, Ref: SSI-10051-PA-740, dated 8/7/2026	C	DPHI Letter approves the appointment of Ms Josephine Heltborg as Lead Auditor to conduct the 9th Construction phase Independent Audit (IA10) pursuant to SSI-10051.
A39	The Planning Secretary may require the initial and subsequent **Independent Audits** to be undertaken at different times to those specified in the Independent Audit Post Approval Requirements (DPIE, 2020), upon giving at least four (4) weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	• This audit (SSTOM IA10 SSI-10051, dated 3/8/2026) • DPHI Letter, Sydney Metro Western Sydney Airport – Auditor Nomination A38, Ref: SSI-10051-PA-740, dated 8/7/2026	C	This audit (SSTOM IA10 SSI-10051, dated 3/8/2026) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with **Condition A39** for SSTOM IA10 will be verified during the 11th SM-WSA Independent Audit (IA11).
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 *Independent Audit Post Approval Requirements* (DPIE, 2020) unless otherwise agreed by the Planning Secretary. .	• This audit (SSTOM IA10 SSI-10051, dated 3/8/2026) • SSI-10051, Independent Audit No.5 – Audit Report (SSTOM), Morasey, February 2026 (WSA IEA Independent Audit No. 9 (IA9), 9/2/2026 • SM - WSA Independent Audit No.9 – Combined Response to Findings, undated • Evidence of submission of SM-WSA Submission of Independent Audit Report #5 & #9 to DPHI, 2/4/2026 (SSI-10051-PA-708)	C	This audit (SSTOM IA10 SSI-10051, dated 3/8/2026) is being conducted in accordance with the Independent Audit Post Approval Requirements, 2020. Compliance with **Condition A40** for IA10 will be verified during the 11th SM-WSA Independent Audit (IA11). The IA9 SSTOM Audit Report, including the Proponent's response to audit findings, was submitted to the Planning Secretary on 2/4/2026, within two months of the IA9 site inspection on 9/2/2026.

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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
INCIDENT AND NON-COMPLIANCE NOTIFICATION AND REPORTING				
Incident Notification, Reporting and Response				
A41	The Planning Secretary must be notified via phone or in writing via the Major Projects website immediately after the Proponent becomes aware of an incident. Any notification via phone must be followed up by a notification in writing via the Major Projects website within 24 hours of the initial phone call. The written notification must identify the CSSI (including the application number and the name of the CSSI if it has one) and set out the location and general nature of the incident.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM Environmental NC and Incident Register, February-August 2026	NT	No incidents triggering notification to DPHI occurred during the audit period. Minor environmental incidents were predominantly oil/hydrocarbon spills to ground or hardstand.
A42	Any incident within or potentially affecting the Controlled Areas of the WaterNSW Pipelines corridor must also be reported to WaterNSW on the WaterNSW 24-hour Incident Notification Number 1800 061 069.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	Auditees advised the WaterNSW pipeline is not located within the current work area for SSTOM.
A43	Subsequent notification must be given and reports submitted in accordance with the requirements set out in **Appendix A**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	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 & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • EVT-0002247 - SM-WSA NCR CoA A44 , dated 27/3/2026 • DPHI Submission - SM-WSA NCR CoA A44 (SSI-10051-PA-707), dated 2/4/2026 • SM-WSA SSTOM NCR-018 SWMP - Final (CoA C10), dated 27/3/2026 • DPHI Submission - NCR 018 - (SSI-10051-PA-705), dated 31/3/2026 • SM-WSA SSTOM NCR-019 SMF TPZ (CoA C10) , dated 22/4/2026 • DPHI Submission - NCR 019 - (SSI-10051-PA-718), dated 24/4/2026	C	There were **three** notifications of Non-Compliance (NC) submitted to DPHI for SSTOM during the audit period. • **EVT-0002247 (27/3/2026): Condition A44.** The final SSTOM Independent Environmental Audit Report 5 (IA5) was issued to Sydney Metro and Parklife Metro (PLM) on 27/3/2025. The report identified a Non-compliance with Condition A44, associated with the notification of historic non-compliance NCR-015 to DPHI, outside of the timeframes of A44. As the NC was raised in the previous audit period it has not been raised again here. • **NCR 018 (27/3/2026): Condition C10** Following review of evidence provided by PLM, on 27/3/2026, the ER identified a non-compliance against CoA C10 as commitments made in the SWMP (namely sampling as per REMM SC7 and REMM SC8), were not implemented prior to ground disturbance in and adjacent to Blaxland Creek riparian zone and Cosgroves Creek (risk areas for ASS and high salinity potential), during construction of the Active Transport Corridor. Notification of the NC to DPHI was on 31/3/2026, within the required 7-day timeframe. Refer also to **Condition C10**. • **NCR 019 (22/4/2026): Condition C10** On 22 April 2026, a vehicle was observed parked within the designated Tree Protection Zone (TPZ) at the SMF car park. Flagging delineation controls were noted to be partially compromised, however, it is unclear whether this occurred prior to or following the vehicle's entry into the no-go zone. TPZ controls were confirmed to be in place during the previous environmental inspection undertaken on 16 April 2026. 'TPZ – No Access' requirements continue to be communicated via environmental notice boards at the SMF and reinforced through refresher toolbox talks. Notification of the NC to DPHI was on 24/4/2026, within the required 7-day timeframe. Refer also to **Condition C10**. Actions raised from NCs were closed-out to the satisfaction of SM and the ER.
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. ***Note:** A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • SM-WSA SSTOM FAW NCR CoA A44 , dated 27/3/2026 • SM-WSA SSTOM NCR-018 SWMP - Final, dated 27/3/2026 • SM-WSA SSTOM NCR-019 SMF TPZ - Rev01, dated 22/4/2026	C	There were **three** notifications of Non-Compliance (NC) submitted to DPHI for SSTOM during the audit period. Details in the NCR reports submitted to DPHI complied with the requirements of **Condition A45**.
IDENTIFICATION OF WORKFORCE				
A46	All Heavy Vehicles used for spoil haulage must be clearly marked on the sides and rear with the project name and application number to enable immediate identification by a person viewing the Heavy Vehicle standing 20 metres away.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Photo of haulage truck, dated 29/7/2026	C	A photograph of a covered spoil truck was sighted as evidence during the audit, dated 29/7/2026 with clear project identification signage displayed. There was no active spoil haulage observed at the time of the audit site inspection.
A47	The CSSI name, application number, telephone number, postal address and email address required under **Condition B3** must be available on site boundary fencing / hoarding at each ancillary facility before the commencement of construction. This information must also be provided on the website required under **Condition B11.**	• Site inspection, 3/8/2026 • Project website: https://parklifemetro.com.au/project/	C	During the site inspection, signage observed was deemed to be compliant.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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	The **Overarching Community Communication Strategy** as provided in the documents listed in **Condition A1**, or updated Strategy must be implemented for the duration of the work. Should the **Overarching Community Communication Strategy** be updated, a copy must be provided to the Planning Secretary for information.	• SM Overarching Community Communication Strategy OCCS Rev5, dated 31/7/2024 • Post Approval submission form (PA-465) to DPHI, WSA OCCS Rev 5, dated 12/8/2024 • DPIE Letter to Sydney Metro RE: Receipt of SM-WSA OCCS Rev 5, dated 20/8/2024 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM Complaints Register February-July 2026	**C**	The Community Communication Strategy (CCS) is a Sydney Metro document that sets out the mechanisms for which communication between the community and key stakeholders will be carried out. The CCS addresses who (the Proponent, Independent Appointments and/or construction contractor) will engage with the community, relevant councils and agencies, how they will engage and the timing of engagements. Submission to and receipt from DPHI sighted for updated OCCS Rev5, dated 31/7/2024.
COMPLAINTS MANAGEMENT SYSTEM				
B2	A **Complaints Management System** must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SM-WSA Cumulative Impact Meeting Minutes #024 18/2/2026 • SM-WSA Cumulative Impact Meeting Minutes #025 18/3/2026 • SM-WSA Cumulative Impact Meeting Minutes #026 15/4/2026 • SM-WSA Cumulative Impact Meeting Minutes #027 20/5/2026 • SM-WSA Cumulative Impact Meeting Minutes #028 17/6/2026 • SM-WSA Cumulative Impact Meeting Minutes #029 15/7/2026 • SMF Package for Additional Construction Hours and Extension Community Agreement E1.3 Report Rev02, dated 24/07/2026	**C**	Complaints are recorded in Consultation Manager (CM), a TfNSW database. PLM has a contract obligation to provide 3x Place Manager roles for SSTOM. The contractor reports Daily Complaints to the EPA in accordance with EPL requirements. A Weekly Complaints Report is distr buted to DPHI and the ER. The ER Project Monthly Report summarises complaints attributed to the project for the month. Complaints within the reporting period that have been attr buted to the project have reduced significantly since the IA5 audit period. During the IA5 reporting period a total of **12 complaints** were received, **2** of which were deemed applicable to SSTOM. The topic of complaints received that were related to the project included: • Complaint received regarding workers parking on local streets, blocking parking for residents and a business. • Resident reported being disturbed by construction noise over a long period of time. The complainant is experiencing general construction fatigue due to the ongoing nature of works. SSTOM confirmed works were compliant with OOHW approvals. After an explanation of project activities and timing was discussed with the complainant, the complaint was closed. **Positive Observation**: ***There have been no repeat complaints or complainants during the IA6 audit period, and complaints regarding worker parking around St Marys station that had spiked during the IA5 audit period, had reduced significantly, indicating a proactive and effective approach to complaints management by the project team .*** Potential remains for cumulative impacts from SSTOM with other nearby project sites. Cumulative impact assessments are undertaken by PLM during OOH works planning. Refer to noise conditions for more information. It is noted that a decrease in the number of complaints received by the project aligns with a reduction in the amount of out of hours work being undertaken. For example, at St Mary's Station, out of hours work for beam delivery concrete pours have not been utilised as frequently during the audit period and works associated with the neighbouring SM-WSA Footbridge St Marys (FSM) project site have also decreased. Cumulative impacts from interfaces and other nearby construction sites have historically been managed through monthly Cumulative Impact Meetings. Sydney Metro undertakes periodic meetings with surrounding projects, including Bradfield Delivery Authority (BDA) and the FAW_FSM project at St Marys. BDA meetings are attended by PLM, Sydney Metro, and WEM Civil (the BDA Principal Contractor) during which cumulative impacts are discussed. Outcomes of both meetings are referenced and discussed as appropriate within fortnightly formal Environmental Working Group minutes or in informal discussions with PLM. Monthly PLM delivery interface (Cumulative Impact) meetings are minuted and include attendees from Sydney Metro, SSTOM and FAW_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. Noise impacts reduced with ta reduction in out of hours works, while potential cumulative impacts for surface water, air quality and HV movements continued to be monitored. Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project, particularly with utility works scheduled to commence in the St Marys precinct in mid-late 2026.
B3	The following information must be available to facilitate community enquiries and manage complaints before the commencement of work and for 12 months following the completion of construction: (a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquires may be sent; (c) an email address to which electronic complaints and enquiries may be transmitted; and (d) a mediation system for complaints unable to be resolved. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026	**C**	(a) A project 1800 number (1800 717 703) has been established (b) Project postal address: Sydney Metro, PO Box K659, Haymarket NSW 1240 (c) A project email address (whtbl@transport.nsw.gov.au) has been established and can be accessed via the Contact Us link on the ParkLife Metro website (d) A mediation system has been established (refer B8-B10) The above information is available on the project website, on shadecloth around construction sites, and is included in community notifications.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B4	A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any work and for a minimum of 12 months following the completion of construction. The Complaints Register must record the: (a) number of complaints received; (b) date and time of the complaint; (c) number of people (in the household) affected in relation to a complaint, if relevant; (d) method by which the complaint was made; (e) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; (f) issue of the complaint; (g) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (h) if no action was taken, the reason(s) why no action was taken.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SMF Package for Additional Construction Hours and Extension Community Agreement E1.3 Report Rev02, dated 24/07/2026	C	The SSTOM Complaints Register for the audit period was sighted. The Complaints Register is updated as complaints are received. The Contractor provides a copy of the Complaints Register to TfNSW daily. Sydney Metro provides a copy of the Complaints Register to DPHI weekly. A copy is also provided to the ER weekly. Complaints within the reporting period have been predominantly related to Worker parking, with a significant spike in complaints received after 1/10/2025 when PLM removed bollards from street parking spots at the request of Penrith City Council. The subsequent spike in complaints and investigations resulted in an NC being raised by the project against Condition E109 for not implementing the Worker Carparking Strategy. Refer to Condition E109 for more information. During the IA5 reporting period a total of 12 complaints were received, 2 of which were deemed applicable to SSTOM. The topic of complaints received that were related to the project included: • Complaint received regarding workers parking on local streets, blocking parking for residents and a business. • Resident reported being disturbed by construction noise over a long period of time. The complainant is experiencing general construction fatigue due to the ongoing nature of works. SSTOM confirmed works were compliant with OOHW approvals. After an explanation of project activities and timing was discussed with the complainant, the complaint was closed. It is noted that, apart from Worker parking, there have been no repeat complaints or complainants during the IA5 audit period, with all complaints being investigated and closed-out with actions to reduce further impact implemented.
B5	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning Industry and Environment, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties; (b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement). The Collection Statement must be included on the Proponent or development website to make prospective complainants aware of their rights under the Privacy and Personal Information Protection Act 1998 (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Complainants Privacy Collection Statement: https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice	C	Auditees provided a summary of information describing how the information specified in **Condition B5** is communicated to complainants. • The Complainants Privacy Collection Statement was available on the PLM website - https://parklifemetro.com.au/wp-content/uploads/2023/08/Complaints-Privacy-Collection-Notice and Sydney Metro website - https://www.sydneymetro.info/privacy-statement-use-sydney-metro-website • A Privacy Management Plan has been prepared and was available on the Sydney Metro website - https://www.sydneymetro.info/media/document/42641 • Parklife Metro has prepared a SSTOM Community Communications Strategy – Delivery - https://parklifemetro.com.au/wp-content/uploads/2023/11/SMWSASSM-PLD-1NL-PC-PLN-000065-Community-Communications-Strategy-Rev-0 The above documents were reviewed and meet the requirements of **Condition B5**.
B6	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request. Note: Complainants must be advised that the Complaints Register may be forwarded to Government agencies to allow them to undertake their regulatory duties.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026	C	Sydney Metro provides a copy of the Complaints Register to DPHI weekly.
B7	A **Community Complaints Mediator** that is independent of the design and construction personnel must be engaged by the Proponent, upon the referral of the complaint by the **ER** in accordance with the **Overarching Community Communication Strategy**.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 SSTOM project.
B8	The role of the **Community Complaints Mediator** is to provide independent mediation services for any reasonable and unresolved complaint referred by the **ER** where a member of the public is not satisfied by the Proponent's response. Where a **Community Complaints Mediator** is required, a mediator accredited under the National Mediator Accreditation System (NMAS), administered by the Mediator Standards Board must be appointed.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 SSTOM during the audit period.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
B9	The **Community Complaints Mediator** will: (a) review any unresolved disputes, referred by the **ER** in accordance with the **Overarching Community Communication Strategy**; (b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and (c) provide a copy of the recommendations, and the Proponent's response to the recommendations, to the Planning Secretary within one month of the recommendations being made.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.
B10	**Community Complaints Mediation** will not be enacted before the **Complaints Management System** required by **Condition B2** has been executed for a complaint and will not consider issues such as property acquisition, where other dispute processes are provided for in this approval, statute or clear government policy and resolution processes are available, or matters which are not within the scope of this CSSI.	• SSTOM Complaints Register February-July 2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	The role of the CCM is addressed in the CCS and the Sydney Metro WSA Construction Complaints Management System. There has been no referral to the CCM for SSTOM during the audit period.
PROVISION OF ELECTRONIC INFORMATION				
B11	A website or webpage providing information in relation to the CSSI must be established before commencement of work and maintained for the duration of construction, and for a minimum of 24 months following the completion of all stages of construction of the CSSI. Up-to-date information (excluding confidential, private, commercial information or other documents as agreed to by the Planning Secretary) must be published before the relevant work commencing and maintained on the website or dedicated pages including: (a) information on the current implementation status of the CSSI; (b) a copy of the documents listed in Condition A1, and any documentation relating to any modifications made to the CSSI or the terms of this approval; (c) a copy of this approval in its original form, a current consolidated copy of this approval (that is, including any approved modifications to its terms), and copies of any approval granted by the Minister to a modification of the terms of this approval, or links to the referenced documents where available; (d) a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI, or where the issuing agency maintains a website of approvals, licences or permits, a link to that website; (e) a current copy of each document required under the terms of this approval, which must be published within one (1) week of its approval or before the commencement of any work to which they relate or before their implementation, as the case may be; and (f) a copy of the audit reports required under this approval. Where the information / document relates to a particular work or is required to be implemented, it must be published before the commencement of the relevant work to which it relates or before its implementation. All information required in this condition is to be provided on the website or webpage, and easy to navigate.	• PLM Project website: https://parklifemetro.com.au/project/ • Sydney Metro Document L brary: https://www.sydneymetro.info/documents • Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026	C	A project website had been established for SSTOM: https://parklifemetro.com.au/project/ Sydney Metro also maintains a project website: https://www.sydneymetro.info/documents (a) Work Updates including current and past work activity notifications were available on the Sydney Metro project website and addressed the current scope of work at the time of the audit, including out of hours works. The website includes documentation required under **Condition A1** including CEMPs, communication strategies and reports, sustainability documents etc. (b) & (c) Documents listed in **Condition A1** were available on the website: https://www.sydneymetro.info/documents, and included the EIS Chapters & Appendices, Submissions Report and overarching documents associated with the project approval, e.g. Ministers Conditions of Approval, Unexpected Contamination Finds Protocol, and WSA Staging Report Rev 13, 1 June 2026. (d) Project approval & the contractor EPL was on the website. (e) A current copy of most documents requested as evidence during the audit was available on the project website. (f) The previous SSTOM Independent Audit Report (SSTOM IA5/ WSA IA9) was on the project website.

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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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	**Construction Environmental Management Plans (CEMPs)** and **CEMP Sub-plans** must be prepared in accordance with the **Construction Environmental Management Framework (CEMF)** included in the documents listed in **Condition A1** to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in **Condition A1** will be implemented and achieved during construction.	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • SM-WSA Environmental Impact Statement, Appendix F - Construction Environmental Management Framework (CEMF), September 2020 • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206 (St Marys), dated 5/12/2023 (St Marys) • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53823 (Claremont Meadows), dated 8/1/2025 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 03, 12/12/2024	C	Appendix C of the Staging Report documents applicable CEMF requirements for each stage, which have been addressed in the CEMP, endorsed by the ER and approved by DPHI. The CEMP includes reference to the Environmental Management Plan Guideline for Infrastructure Projects (Department of Planning, Industry and Environment, 2020). Section 3.4 (f) of the SM-WSA CEMF addresses the preparation of CEMPs and requires "*The Principal Contractor CEMP will cover the requirements of the relevant planning approval documentation, the conditions of all other permits and licences, the Principal Contractor's corporate EMS, the environmental provisions of the contract documentation and this Construction Environmental Management Framework*". Section 12.2 (a)(viii) of the CEMF 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*". A review of the CEMP and Sub-plans undertaken during the audit did not identify any gaps with CEMF requirements.
C2	With the exception of any **CEMPs** expressly nominated by the Planning Secretary to be endorsed by the **ER**, all **CEMPs** must be submitted to the Planning Secretary for approval. ***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****.*	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 • ER endorsement of AQMP Rev0.0, letter dated 27/6/2023 • ER endorsement of SWMP Rev0.0, letter dated 26/6/2023 • ER Endorsement of Surface Water Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023	C	The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for SSTOM commenced on 8/8/2023, after DPHI approval.
C3	The **CEMP(s)** not requiring the Planning Secretary's approval must be submitted to the **ER** for endorsement no later than one (1) month before the commencement of construction or where instruction is staged no later than one (1) month before the commencement of that stage. That **CEMP** must obtain the endorsement of the **ER** as being consistent with the conditions of this approval and all undertakings made in the documents listed in **Condition A1.**	• Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER Endorsement of CEMP Rev0.0, letter dated 27/6/2023 • ER endorsement of AQMP Rev0.0, letter dated 27/6/2023 • ER Endorsement of AQCMP Rev 0.0, dated 28/6/2023 • ER Endorsement of FFMP Rev 2.0, letter dated 27/3/2024 • ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 • ER Endorsement of NAHMP Rev 0.0, letter dated 26/6/2023 • ER Endorsement of NVMP Rev 0.0, letter dated 27/6/2023 • ER Endorsement of NVCMP Rev 0.0, letter dated 28/6/2023 • ER endorsement of SWMP Rev0.0, letter dated 26/6/2023 • ER Endorsement of SWQCMP Rev 0.0, letter dated 28/6/2023 • ER Endorsement of VAMP Rev 0.0, letter dated 31/7/2023 • ER Endorsement of WMP Rev 1.0, letter dated 31/7/2023 • ER Endorsement of Aboriginal Cultural Heritage Management Plan Rev 9.0 • Sydney Metro Notification of Commencement of Construction, WSA SSTOM, dated 1/8/2023 • Letter to DPE - SSI 10051 Submission of Endorsed SSTOM CEMP, dated 28/6/2023 • Post Approval Form_20230628225726, Submission of endorsed SSTOM CEMP, 28/6/2024	C	The WSA SSTOM CEMP & Sub-plans were: • Endorsed by the ER on 26/6/2023 (SWMP, NAHMP), 27/6/2023 (CEMP, AQMP, & NVMP), 11/7/2023 (GWMP), 31/7/2023 (VAMP, WMP), 27/3/2024 (FFMP) • Submitted to DPHI on 28/6/2023 • Approved by DPHI in a letter dated 4/8/2023 • Construction for SSTOM commenced on 8/8/2023, after DPHI approval. SSTOM CEMP & Sub-plans were submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with **Condition C3**. The SSTOM CEMP & Sub-plans include requirements relevant to MOD-1 (approved 14/4/2022) to amend **Condition E4** to reduce the biodiversity offset credit requirement. DPHI approved the WSA SSTOM CEMP, Sub-plans and Monitoring Programs in a letter dated 4/8/2023. Notifications of commencement of construction were submitted to DPHI (as per **Conditions A34 & A35**) for each stage. Commencement of Construction for SSTOM was on 1/8/2023 for commencement date 8/8/2023. The original CEMP and Sub-plans (Rev 0.0) were endorsed by the ER on 27/6/2023, more than one month prior to the commencement of construction date for SSTOM.
C4	Any **CEMP** to be approved by the Planning Secretary must be endorsed by the ER and then submitted to the Planning Secretary for approval no later than one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	• Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER Endorsement of CEMP Rev0.0, letter dated 27/6/2023 • Letter to DPE - SSI 10051 Submission of Endorsed SSTOM CEMP, dated 28/6/2023 • Post Approval Form_20230628225726, Submission of endorsed SSTOM CEMP, 28/6/2024	C	The WSA SSTOM CEMP Rev 0.0 was: • Endorsed by the ER on 27/6/2023 • Submitted to DPHI on 28/6/2023 • Approved by DPHI in a letter dated 4/8/2023 • Construction for SSTOM commenced on 8/8/2023 The SSTOM CEMP was submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with **Condition C3** and **C4**.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C5	Of the CEMP Sub-plans required under Condition C1, the following CEMP Sub-plans must be prepared in consultation with the relevant government agencies identified for each CEMP Sub-plan. Details of issues raised by a government agency during consultation (as required by Condition A6) must be provided with the relevant CEMP Sub-plan when submitted to the Planning Secretary / ER (whichever is applicable). Where a government agency(is) request(s) is not included, the Proponent must provide the Planning Secretary / ER (whichever is applicable) justification as to why. **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 *temporal activities or activity based staging.*	• Sydney Metro WSA Staging Report Rev 13, 1 June 2026 • Construction Environment Management Plan (CEMP), SSTOM, Rev 03 19/12/2025 • Noise and Vibration Management Sub-plan (NVMP), SSTOM, Rev 04, 13/11/2025 • Flora and Fauna Management Sub Plan (FFMP), Rev 04, 12/11/2025 • Air Quality Management Sub Plan (AQMP), SSTOM, Rev 03, 10/12/2025 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 05.01, 17/2/2026 • Non-Aboriginal Heritage Management Sub Plan (HMP), SSTOM, Rev 03, 1/12/2025 • Waste Management Sub Plan (WMP), SSTOM, Rev 03, 3/12/2025 • Visual Amenity Management Sub Plan (VAMP), Rev 02, 1/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 Consultation Report is attached to each Sub-Plan.	C	Partially Applicable as per the table in Appendix B of the Staging Report Rev 13, 1 June 2026 Table 4-2 of the Staging Report lists the following Sub-plans as applicable to SSTOM: a) Noise and Vibration Management Sub-plan and monitoring program b) Flora and Fauna Sub-plan c) Soil and Water Sub-plan and monitoring program d) Non-Aboriginal Heritage Sub-plan The details of agency consultation are included in each relevant Sub-plan. Consultation with agencies, and the approval of the original WSA SSTOM CEMP & Sub-plans was not conducted within the current reporting period. DPHI approved the WSA SSTOM CEMP & Sub-plans, which included the verification of agency consultation as per **Condition C5**, in a letter dated 4/8/2023.
C6	The **CEMP Sub-plans** must state how: (a) the environmental performance outcomes identified in the documents listed in **Condition A1** will be achieved; (b) the mitigation measures identified in the documents listed in **Condition A1** will be implemented; (c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction (including cumulative impacts), as identified through ongoing environmental risk analysis, will be managed through SMART principles.	• SSTOM CEMP, Rev 03 19/12/2025 • SSTOM NVMP, Rev 04, 13/11/2025 • SSTOM FFMP, Rev 04, 12/11/2025 • SSTOM AQMP, Rev 03, 10/12/2025 • SSTOM SWMP, Rev 05.01, 17/2/2026 • SSTOM HMP, Rev 03, 1/12/2025 • SSTOM WMP, Rev 03, 3/12/2025 • SSTOM VAMP, Rev 02, 1/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023.
C7	With the exception of any **CEMP Sub-plans** expressly nominated by the Planning Secretary to be endorsed by the **ER**, all **CEMP Sub-plans** must be submitted to the Planning Secretary for approval.	• SSTOM FFMP, Rev 04, 12/11/2025 • Sydney Metro WSA SSI 10051 MOD 1 Approval, dated 14/4/2024 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	DPHI approval of the WSA SSTOM CEMP & Sub-plans was not within the current audit period. Compliance with **Condition C7** was verified during a previous audit (IA1). The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023.
C8	The **CEMP Sub-plans** not requiring the Planning Secretary's approval must obtain the endorsement of the **ER** as being in accordance with the conditions of approval and all relevant undertakings made in the documents listed in **Condition A1**. Any of these **CEMP Sub-plans** must be submitted to the **ER** with, or subsequent to, the submission of the **CEMP** but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	• ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 • ER endorsement of AQMP Rev0.0, letter dated 27/6/2023	C	The documents required by CEMF and not requiring DPHI approval - Groundwater Monitoring Program and AQMP have been endorsed by the ER.
C9	Any of the **CEMP Sub-plans** to be approved by the Planning Secretary must be submitted to the Planning Secretary with, or subsequent to, the submission of the **CEMP** but in any event, no later than one (1) month before construction or where construction is staged no later than one (1) month before the commencement of that stage.	• DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	As per the DPHI approval letter, the CEMP, Sub-plans and associated monitoring programs were submitted in compliance with **Condition C9**.
C10	Construction must not commence until the **CEMP** and all **CEMP Sub-plans** have been approved by the Planning Secretary or endorsed by the **ER** (whichever is applicable), unless otherwise agreed by the Planning Secretary. The **CEMP** and **CEMP Sub-plans**, as approved by the Planning Secretary or endorsed by the **ER** (whichever is applicable), including any minor amendments approved by the **ER**, must be implemented for the duration of construction.	• SSTOM CEMP, Rev 03 19/12/2025 • SSTOM NVMP, Rev 04, 13/11/2025 • SSTOM FFMP, Rev 04, 12/11/2025 • SSTOM AQMP, Rev 03, 10/12/2025 • SSTOM SWMP, Rev 05.01, 17/2/2026 • SSTOM HMP, Rev 03, 1/12/2025 • SSTOM WMP, Rev 03, 3/12/2025 • SSTOM VAMP, Rev 02, 1/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER endorsement of GWMP Rev0.0, letter dated 11/7/2023 • ER endorsement of AQMP Rev0.0, letter dated 27/6/2023 • SM-WSA SSTOM NCR-018 SWMP - Final (CoA C10), dated 27/3/2026 • DPHI Submission - NCR 018 - (SSI-10051-PA-705), dated 31/3/2026 • SM-WSA SSTOM NCR-019 SMF TPZ (CoA C10) , dated 22/4/2026 • DPHI Submission - NCR 019 - (SSI-10051-PA-718), dated 24/4/2026 • Supplementary Acid Sulfate Soils Assessment, SSTOM Orchard Hills East (OHE) – Stockpiles SP01, SP02 and SP03 – Orchard Hills and Luddenham, NSW, Alliance Ref: 17614.3.1-ER-2-1, dated 4/5/2026 • Email correspondence between DPHI, Sydney Metro, the ER and PLM RE: Non-Compliance Condition C10 of SSI-10051, dated 18/2/2026 to 27/5/2026	NC	DPHI approval of the original WSA SSTOM CEMP & Sub-plans was not within the current audit period. Compliance with **Condition C10** was verified during IEA #1. The WSA SSTOM CEMP & Sub-plans were approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023. The implementation of the CEMP & Sub-plans was verified during the audit site inspection and as noted throughout the audit. **Self-Reported Non-Compliances 1 & 2:** • **NCR 018 (27/3/2026):** Condition C10 Following review of evidence provided by PLM, on 27/3/2026, the ER identified a non-compliance against CoA C10 as commitments made in the SWMP (namely sampling as per REMM SC7 and REMM SC8), were not implemented prior to ground disturbance in and adjacent to Blaxland Creek riparian zone and Cosgroves Creek (risk areas for ASS and high salinity potential), during construction of the Active Transport Corridor. Notification of the NC to DPHI was on 31/3/2026, within the required 7-day timeframe. Refer also to **Condition A44**. • **NCR 019 (22/4/2026):** Condition C10 On 22 April 2026, a vehicle was observed parked within the designated Tree Protection Zone (TPZ) at the SMF car park. Flagging delineation controls were noted to be partially compromised, however, it is unclear whether this occurred prior to or following the vehicle's entry into the no-go zone. TPZ controls were confirmed to be in place during the previous environmental inspection undertaken on 16 April 2026. 'TPZ – No Access' requirements continue to be communicated via environmental notice boards at the SMF and reinforced through refresher toolbox talks. Notification of the NC to DPHI was on 24/4/2026, within the required 7-day timeframe. Refer also to **Condition A44**.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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.	• SSTOM FFMP, Rev 04, 12/11/2025 • ER Endorsement of PLM CEMP & Sub-plans, letter dated 23/12/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026	**C**	The WSA SSTOM Flora and Fauna CEMP Sub-plan Rev04 was endorsed by the ER on 23/12/2025. A detailed review of compliance of the WSA SSTOM Flora and Fauna CEMP Sub-plan with **Condition C11** was conducted during IA1 and found to meet the relevant requirements.
C12	In addition to the relevant requirements of the **CEMF**, the **Soil and Water CEMP Sub-Plan** must include but not be limited to: (a) details how the requirements of **Conditions E127, E128** and **E129** will be met; and (b) the unexpected contaminated finds protocol required by **Condition E98**.	• ER endorsement of SWMP Rev0.0, letter dated 26/6/2023 • ER Endorsement of SWQCMP Rev 0.0, letter dated 28/6/2023 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 05.01, 17/2/2026 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 04, 12/8/2025 (SWMP, Appendix B) • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206, dated 5/12/2023 • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53823 (Claremont Meadows), dated 8/1/2025	**C**	The WSA SSTOM Soil and Water CEMP Sub-plan was endorsed by the ER on 26/6/2023. The WSA SSTOM Soil and Water CEMP Sub-plan was approved by DPHI on 4/8/2023. WSA SSTOM construction commenced on 8/8/2023, after Soil and Water CEMP Sub-plan endorsement and DPHI approval. Minor amendments to the CEMP and Sub-plans have been approved by the ER as required. A detailed review of compliance of the WSA SSTOM Soil and Water CEMP Sub-plan with **Condition C12** was conducted during IA1 and found to meet the relevant requirements, including how **Conditions E127, E128 and E129** will be met. Refer to **Conditions E127, E128 and E129** for more information.
CONSTRUCTION MONITORING PROGRAMS				
C13	The following **Construction Monitoring Programs** must be prepared in consultation with the relevant government agencies (as required by **Condition A6**) identified for each to compare actual performance of construction of the CSSI against the performance predicted in the documents listed in **Condition A1** or in the **CEMP**. Where a government agency(ies) request(s) is not included, the Proponent must provide the Planning Secretary / **ER** (whichever is applicable) justification as to why. **Required Construction Monitoring Programs** / **Relevant government agencies to be consulted for each Construction Monitoring Program** (a) Noise and vibration — Relevant Councils and WaterNSW (in relation to its assets) (b) Surface water quality — DPIE Water, DPI Fisheries, and Relevant Councils (c) Groundwater — DPIE Water (d) Air Quality — Relevant Councils	• SSTOM CEMP, Rev 03 19/12/2025 • NVMP, SSTOM, Rev 04, 13/11/2025, includes: • Noise and Vibration Monitoring Program • SSTOM AQMP, Rev 03, 10/12/2025, includes: • Air Quality Construction Monitoring Program • SSTOM SWMP, Rev 05.01, 17/2/2026, includes: • Surface Water Monitoring Program, dated 12/8/2025 • Groundwater Monitoring Program, dated January 2026 • Groundwater Management Procedure, dated 3/10/2024 • ER Endorsement of PLM Sub-plans and monitoring reports, letter dated 23/12/2025: - Flora and Fauna Management Sub-plan Rev 04, 12/11/2025 - Non-Aboriginal Heritage Management Sub-plan Rev 03, 1/12/2025 - Waste Management Sub-plan Rev 03, 3/12/2025 - Noise and Vibration Management Sub-Plan Rev 04, 13/11/2025 - Noise and Vibration Monitoring Program Rev 04.01, dated 13/11/2025 - Air Quality Management Plan, Rev 03, 10/12/2025 - Air Quality Monitoring Program Rev 03.01, dated 1/12/2025 - Visual Amenity Management Sub-Plan Rev 01, dated 17/12/2024 • ER Endorsement of Surface Water Quality Monitoring Program Rev 04, 12/8/2025, letter dated 13/8/2025 • ER Endorsement of Soil and Water Management Sub Plan (SWMP), Rev 05.01, 17/2/2026, letter dated 25/2/2026 • ER Endorsement of Groundwater Monitoring Program Rev 3.0, Jan 2026, letter dated 28/1/2026 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023	**C**	Partially Applicable as per the table in Appendix B of the Staging Report Rev 10, 22 May 2024 Table 4-2 of the Staging Report lists the following Sub-plans as applicable to SSTOM: a) Noise and Vibration Monitoring Program - Included in Sub-plan b) Surface Water Quality Monitoring Program - Included in Sub-plan c) Groundwater Monitoring Program - Included in Sub-plan d) Air Quality Monitoring Program - Included in Sub-plan DPHI Water were consulted on 19/5/2023 during preparation of the groundwater monitoring program. DPE Water provided recommendations regarding monitoring data presentation, reporting and water and enhancements to the monitoring bore network and Trigger Action Response Plan. Compliance with **Condition C13** was verified during IA1. Details of consultation with the relevant government agencies is documented in each relevant Sub-plan. The WSA SSTOM CEMP and Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C14	Each **Construction Monitoring Program** must provide: (a) details of baseline data available including the period of baseline monitoring; (b) details of baseline data to be obtained and when; (c) details of all monitoring of the project to be undertaken; (d) the parameters of the project to be monitored; (e) the frequency of monitoring to be undertaken; (f) the location of monitoring; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicated unacceptable project impacts; (j) a consideration of SMART principles; (k) any consultation to be undertaken in relation to the monitoring programs; and (l) any specific requirements as required by **Conditions C15 to C16**.	• ER Interview, 7/8/2026 • SSTOM CEMP, Rev 03 19/12/2025 • SSTOM NVMP, Rev 04, 13/11/2025, includes: • Noise and V bration Monitoring Program • SSTOM AQMP Rev 03, 10/12/2025, includes: • Air Quality Construction Monitoring Program • SSTOM SWMP, Rev 05.01, 17/2/2026, includes: • Surface Water Monitoring Program • Groundwater Monitoring Program, Rev A, dated 11/5/2023 • ER Endorsement of Noise and Vibration Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023 • ER Endorsement of Surface Quality Construction Monitoring Program Revision 4, letter dated 13/8/2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	**C**	Construction monitoring programs for Noise & Vibration, Air Quality and Soil & Water were reviewed as part of the audit. All parts (a)-(l) of **Condition C14** were included in each monitoring program. The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI (in the case of the Noise & Vibration and Surface Water monitoring programs) in a letter dated 4/8/2023. A review of the surface water quality monitoring program and associated monitoring locations was undertaken in consultation with the ER to ensure the most effective locations have been selected. The review resulted in an overall reduction in the number of monitoring of locations. Two monitoring locations (SW1 and SW2) in South Creek, associated with the St Marys station project were removed due to no discharge occurring from the St Marys site. Monitoring locations SW7, SW9 & SW10 were also removed (Badgerys Creek) as they were not considered effective in monitoring construction impacts. An ER Endorsement letter summarising the approval of these changes was sighted, dated 13/8/2025. Surface water and Groundwater monitoring programs were updated during the audit period.
C15	The **Noise and Vibration Construction Monitoring Program** must include: (a) noise and vibration monitoring at representative residential and other locations (including at the worst- affected residences), subject to property owner approval, to confirm construction noise and vibration levels; (b) monitoring undertaken during the day, evening and night-time periods throughout the construction period and cover the range of activities being undertaken; (c) method and frequency for reporting monitoring results; and (d) a process to undertake real time noise and v bration monitoring. The results of the monitoring must be readily available to the construction team, the Proponent and **ER**. The Planning Secretary and EPA must be provided with access to the results on request.	• SSTOM CEMP, Rev 03 19/12/2025 • NVMP, SSTOM, Rev 04, 13/11/2025, includes: • Noise and V bration Monitoring Program • ER Endorsement of NVMP Rev 0.0, letter dated 28/6/2023 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	**C**	The Noise & Vibration monitoring program (part of the WSA SSTOM Construction NVMP) was reviewed as part of the audit. All parts (a)-(d) of **Condition C15** were included in the monitoring program. The WSA SSTOM Noise and Vibration construction monitoring program was endorsed by the ER in a letter dated 28/6/2023 and approved by DPHI in a letter dated 4/8/2023.
C16	**Groundwater Construction Monitoring Program** must include: (a) groundwater monitoring networks at each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (b) detail of the location of all monitoring bores with nested sites to monitor both shallow and deep groundwater levels and quality; (c) define the location of saltwater interception monitoring where sentinel groundwater monitoring bores will be installed between the saline sources and that of each construction excavation site predicted to intercept groundwater in the documents listed in Condition A1; (d) results from existing monitoring bores; (e) monitoring and gauging of groundwater inflow to the excavations predicted to intercept groundwater in the documents listed in Condition A1, appropriate trigger action response plan for all predicted groundwater impacts upon each noted neighbouring groundwater system component for each excavation construction site; (f) trigger levels for groundwater quality, salinity and groundwater drawdown in monitoring bores and / or other groundwater users; (g) daily measurement of the amount of water discharged from the water treatment plants; (h) water quality testing of the water discharged from treatment plants; (i) management and mitigation measures and criteria, including measures to address impacts on groundwater dependent ecosystems; (j) groundwater inflow to the excavations to enable a full accounting of the groundwater take from the Sydney Basin Central Groundwater Source; (k) reporting of groundwater gauging at excavations, groundwater monitoring, groundwater trigger events and action responses; and (l) methods for providing the data collected to Sydney Water where discharges are directed to their assets.	• SSTOM SWMP, Rev 04, 26/8/2025, includes: • Surface Water Monitoring Program • Groundwater Construction Monitoring Program, Rev 03, dated January 2026 • ER Endorsement of Groundwater Monitoring Program Rev 0, letter dated 11/7/2025 • ER Endorsement of Groundwater Monitoring Program Rev 2, letter dated 15/1/2025 • ER Endorsement of Groundwater Monitoring Program Rev 3, letter dated 28/1/2026	**C**	The Groundwater Construction Monitoring Program forms part of the SWMP and was Rev0 was endorsed by the ER in a letter dated 11/7/2023. Section 1.3.1 Conditions of Approval, and Table 1 of the Groundwater Monitoring Program detail how these conditions have been addressed. A Groundwater Management Procedure is provided in Appendix G of the SWMP, which includes the Groundwater Monitoring Program. The Groundwater Monitoring Program was reviewed to align with the SBT Groundwater Monitoring Program , and implementation commenced upon endorsed / approval by the ER. Auditees advised that a number of the groundwater monitoring wells established for the SBT Groundwater Monitoring Program had been destroyed during construction. PLM has engaged Coffey to install a number of new wells, and groundwater monitoring is being conducted by ADE. The first round of monitoring for the new wells was conducted late July/early August 2025. Two earlier rounds of groundwater monitoring were conducted by ADE on the SBT wells. The groundwater monitoring program was updated during the IA5 audit period to Rev3 (Groundwater Monitoring Program, Rev 3, dated 28/1/2026). The monitoring program was updated to include reference to the *Water Management (General) Regulation 2025* (Division 3, Clause 45 and Schedule 4, Part 2, Clause 4), noting the exemption applying to Sydney Metro and persons acting on its behalf from the requirement to hold a Water Access Licence under the *Water Management Act 2000*. Minor updates include groundwater well replacement procedures, decommissioning of damaged wells, and administrative updates.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
C17	With the exception of any **Construction Monitoring Programs** expressly nominated by the Planning Secretary to be endorsed by the **ER**, all **Construction Monitoring Programs** must be submitted to the Planning Secretary for approval.	• DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • Sydney Metro WSA Staging Report Rev 13, 1/6/2026	C	The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI (in the case of the Noise & Vibration and Surface Water monitoring programs) in a letter dated 4/8/2023. The Sydney Metro WSA Staging Report sets out the requirement for ER Endorsement and DPHI approval roles for the SSTOM CEMP, Sub-plans and monitoring programs, which have been applied for the project.
C18	The **Construction Monitoring Programs** not requiring the Planning Secretary's approval must obtain the endorsement of the **ER** as being in accordance with the conditions of approval and all undertakings made in the documents listed in **Condition A1**. Any of these **Construction Monitoring Programs** must be submitted to the **ER** for endorsement at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	• ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 • ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023 • Sydney Metro WSA Staging Report Rev 13, 1/6/2026	C	ER Endorsement Letters were sighted for the SSTOM Air Quality and Groundwater Construction monitoring programs. As set out in Table 4-6 of the Sydney Metro WSA Staging Report, the Air Quality and Groundwater Construction monitoring programs require ER Review and Endorsement only (i.e. no requirement for approval of the Planning Secretary). The SSTOM Air Quality and Groundwater Construction monitoring programs, were approved by the ER in letters dated 28/6/2023 and 11/7/2023 respectively. Construction for SSTOM commenced on 8/8/2023. SSTOM CEMP & Sub-plans (and Construction Monitoring Programs within) were submitted to the ER for endorsement no later than one month before the commencement of SSTOM in accordance with **Condition C18**.
C19	Any of the **Construction Monitoring Programs** which require Planning Secretary approval must be endorsed by the **ER** and then submitted to the Planning Secretary for approval at least one (1) month before the commencement of construction or where construction is staged no later than one (1) month before the commencement of that stage.	• SSTOM CEMP, Rev 03 19/12/2025 • ER Endorsement of PLM Sub-plans and monitoring reports, letter dated 23/12/2025 • NVMP, SSTOM, Rev 04, 13/11/2025, includes: • Noise and V bration Monitoring Program • SSTOM SWMP, Rev 04, 26/8/2025, includes: • Surface Water Monitoring Program • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023	C	The WSA SSTOM CEMP and Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023. As set out in the Sydney Metro WSA Staging Report, the Noise & Vibration and Surface Water Construction monitoring programs require DPHI approval. Construction for SSTOM commenced on 8/8/2023. SSTOM CEMP & Sub-plans (and Construction Monitoring Programs within) were submitted to the Planning Secretary for approval no later than one month before the commencement of SSTOM in accordance with **Condition C19**.
C20	Unless otherwise agreed with the Planning Secretary, construction must not commence until the Planning Secretary has approved, or the **ER** has endorsed (whichever is applicable), all of the required **Construction Monitoring Programs** and all relevant baseline data for the specific construction activity has been collected.	• ER Endorsement of Air Quality Construction Monitoring Program Rev 0.0, letter dated 28/6/2023 • Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 • ER Endorsement of Groundwater Monitoring Program Rev 0.0, letter dated 11/7/2023 • ER Endorsement of Groundwater Monitoring Plan Rev 02, letter dated 15/1/2025 • Sydney Metro WSA Staging Report Rev 12, 11 Dec 2025 • DPHI CEMP & Sub-plan approval letter: • WSA SSTOM CEMP, Sub-plans and Monitoring Programs, dated 4/8/2023 • Baseline Noise Measurement Plan ver.A dated 24 Feb 2023 • Groundwater Monitoring Program Rev A • Air Quality Construction Monitoring Program Rev 0.0 • Soil and Water Management Plan, Rev 00	C	The WSA SSTOM Sub-plans, and construction monitoring programs within, were endorsed by the ER, and approved by DPHI in a letter dated 4/8/2023. Construction for WSA SSTOM commenced on 8/8/2023. Stage 2 CEMP & Sub-plans (and Construction Monitoring Programs within) were submitted to DPHI for approval no later than one month before the commencement of SSTOM in accordance with **Condition C20**. Baseline data for air quality, noise, groundwater and surface water quality were verified to be included in the corresponding CEMP Sub-plans, endorsed by the ER and approved by DPHI.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM AQMP, Rev 03, 10/12/2025 • Appendix B Air Quality Monitoring Program • SSTOM NVMP, Rev 04, 13/11/2025 • Appendix B Noise & V bration Monitoring Program • SSTOM SWMP, Rev 05.01, 17/2/2026 • Surface Water Monitoring Program - Appendix B • Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 • ER Endorsement of Groundwater Monitoring Plan Rev 02, letter dated 15/1/2025 • ER Endorsement of Surface Water Quality Construction Monitoring Program Revision 4, dated 13/8/2025 • ER Endorsement of Soil and Water Management Plan Rev 4 Version 1, dated 3/9/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 2 Feb-July 2024 Rev 01, dated 9/10/2024 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 3 Aug 2024-Jan 2025 Rev01, dated 10/4/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 4 Feb-July 2025 Rev01, dated 7/11/2025 ***• Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026*** • Sydney Metro WSA - SSTOM - Surface Water Construction Monitoring Report 1 August 2024 Rev01, dated 8/11/2024 • Sydney Metro WSA - SSTOM - Surface Water Construction Monitoring Report 2 August 2025 Rev 01, dated 7/11/2025 • Sydney Metro WSA - SSTOM - Surface Water Construction Monitoring Report 3 August 2025-July 2025 Rev 01, dated 7/11/2025 • Sydney Metro WSA SSTOM Air Quality Construction Monitoring Report 1 August 2024 Rev01, dated 25/10/2024 • Sydney Metro WSA - SSTOM - Air Quality Construction Monitoring Report 2 August 2024-July 2025 Rev 01, dated 7/11/2025 • Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report 3 Dec 2024-July 2025 Rev00, dated 29/10/2025 ***• Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report 4 July 2025-Feb 2026 Rev00, dated 30/4/2026*** • EPL 21807 Monitoring Report February 2026 • EPL 21807 Monitoring Report March 2026 • EPL 21807 Monitoring Report April 2026 • EPL 21807 Monitoring Report May 2026 • EPL 21807 Monitoring Report June 2026	C	Reporting timeframes for SSTOM Construction Monitoring Programs are summarised below: - Noise & V bration Monitoring Program - Six-monthly - Air Quality Monitoring Program - Annual - Surface Water Monitoring Program - Annual - Groundwater Monitoring Program - Six-monthly The SSTOM Noise & Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 sets out the results of implementation of the Noise & V bration Construction Monitoring Program. Noise mitigation measures as per **Condition E74** are set out in the WSA SSTOM NVMP, and are defined for specific scenarios in Out of Hours Work (OOHW) Permits. The SSTOM Surface Water and Air Quality CMRs August 2024-July 2025 set out the results of implementation of the Surface Water and Air Quality Construction Monitoring Programs. The Groundwater Construction Monitoring Report #4 July 2025-February 2026 sets out the results of implementation of the Groundwater Construction Monitoring Program. ER Monthly Reports and ER Inspection Reports also provide evidence of the review and implementation of monitoring requirements as set out in monitoring programs. EPL Monitoring Reports are prepared monthly and were available on the PLM project website. EPL Monitoring Reports include the results of Weather, Noise & Vibration, Water, Surface Water and Discharge to water monitoring. Updated Groundwater and Noise and vibration monitoring reports were prepared for the IA6 audit period. Groundwater level monitoring has shown water levels are returning to pre-construction levels. Once St Mary's station box is tanked groundwater contamination monitoring will no longer be required. Validation monitoring will then be undertaken followed by the preparation of a SAR and SAS.
C22	The results of the **Construction Monitoring Programs** must be submitted to the Planning Secretary, **ER** and relevant regulatory agencies, for information in the form of a **Construction Monitoring Report** at the frequency identified in the relevant **Construction Monitoring Program**. ***Note:*** *Where a relevant* ***CEMP Sub-plan*** *exists, the relevant* ***Construction Monitoring Program*** *may be incorporated into that* ***CEMP Sub-plan***.	• SSTOM SWMP, Rev 05.01, 17/2/2026 • Surface Water Monitoring Program - Appendix B • Groundwater Construction Monitoring Program, Rev 2, dated 19/12/2024 • ER Endorsement of Groundwater Monitoring Plan Rev 02, letter dated 15/1/2025 • ER Endorsement of Surface Water Quality Construction Monitoring Program Revision 4, dated 13/8/2025 • ER Endorsement of Soil and Water Management Plan Rev 05.01, dated 25/2/2026 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026 • Submission to DPHI (SSI-10051-PA-725), dated 8/5/2026 • Submission to EPA - no evidence received • Submission to Liverpool Council email, dated 20/7/2026 • Submission to Penrith Council email, dated 20/7/2026 • Sydney Metro WSA - SSTOM - Surface Water Construction Monitoring Report 3 August 2025-July 2025 Rev 01, dated 7/11/2025 • Submission to DPHI (SSI-10051-PA-666), dated 10/11/2025 • Submission to DPHI Water, email dated 10/11/2025 • Submission to EPA email, dated 10/11/2025 • Submission to DPIRD Fisheries, email dated 10/11/2025 • Submission to Liverpool Council email, dated 10/11/2025 • Submission to Penrith Council email, dated 10/11/2025 • Sydney Metro WSA - SSTOM - Air Quality Construction Monitoring Report 2 August 2024-July 2025 Rev 01, dated 7/11/2025 • Submission to DPHI (SSI-10051-PA-664), dated 10/11/2025 • Submission to EPA email, dated 10/11/2025 • Submission to Liverpool Council email, dated 10/11/2025 • Submission to Penrith Council email, dated 10/11/2025 • Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report 4 July 2025-Feb 2026 Rev00, dated 30/4/2026 • Submission to DPHI (SSI-10051-PA-720), dated 30/4/2026 • Submission to DCCEEW Water, email dated 8/5/2026 • Submission to Sydney Water, email dated 8/5/2026	C	A six-monthly reporting frequency is specified in the Noise and V bration Monitoring Program. Section 6.3.1 of the NV Monitoring Program states "*The Construction Monitoring Reports will be submitted to the Planning Secretary, ER, Water NSW (where appliable and in accordance with REMM NV2) and the EPA upon request, in accordance with* ***Condition C22****. The Construction Monitoring Reports will be submitted six-monthly for the duration of SSTOM Works*". The SSTOM Noise & Vibration CMR 5, dated 8/5/2026 covers the period August 2025 to January 2026 and was submitted to DPHI on 8/5/2026, within the 6-monthly timeframe (SSTOM NVCMR 4 was submitted to DPHI on 10/11/2025). **SSTOM Noise & Vibration Construction Monitoring Report 5 was submitted to Liverpool and Penrith Councils on 20/7/2026.** It is understood that vibratory work around the WaterNSW canal had not been undertaken so submission to WaterNSW was not triggered. **Observation 1**: ***SSTOM Noise & Vibration Construction Monitoring Report 5 was submitted to Liverpool and Penrith Councils outside the required six-monthly period on 20/7/2026. The reports were due for submission by 10/5/2026 as per the six-monthly frequency set in the CMP. There was no evidence of submission of CMR 5 to NSW EPA***. **Recommendation**: ***Ensure future CMRs are submitted to relevant regulatory agencies, and are submitted as per the frequency documented in the Construction Monitoring Program.*** *Condition C22 requires: "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".* *PLM has not provided evidence of submission of the NVCMR 4 to NSW EPA (submission to DPHI was on 8/5/2026). It i s noted that evidence of submission of the CMR to EPA was sighted during the last audit period.* *PLM have provided the following response: "In relation to the Noise and Vibration CMR, this report was not submitted to the EPA. In accordance with Section 6.3.1 of the Noise and Vibration Monitoring Program, submission is only required upon request from the EPA. However, EPA Noise Monitoring Reports associated with out-of-hours (OOH) works are submitted in accordance with the conditions of our EPL, on a monthly basis where the relevant conditions are utilised. The most recent report was submitted in June 2026, please let us know if you would like evidence of this".* *The Auditor notes that, while the frequency of submission to relevant regulatory agencies can be defined in the Construction Monitoring Program, the CMP can't change the intent of the condition, which is to submit the CMR to relevant regulatory agencies.* The SSTOM Surface Water CMR 3 covers the period from Aug 2024 - July 2025, dated 7/11/2025. The SSTOM Surface Water CMR 3 was submitted to DPHI, DPHI Water, EPA, DPIRD Fisheries, and Councils on 10/11/2025. The SSTOM Air Quality CMR 2 covers the period from Aug 2024 - July 2025, dated 7/11/2025. The SSTOM Air Quality CMR 2 was submitted to DPHI, EPA and Councils on 10/11/2025. The above CMRs are required to be prepared and submitted to relevant regulatory agencies annually. Submissions were within the required annual timeframe. The Groundwater Monitoring Program (GWMP) is set out in Appendix B of the Groundwater Management Procedure (Appendix G of the SWMP). The GWMP includes monitoring of groundwater levels (GWL), including groundwater monitoring wells positioned near Groundwater Dependent Ecosystems (GDEs). Groundwater quality is monitored at targeted locations, with groundwater sampled for the measurement of field parameters and laboratory analysis. Groundwater CMRs require submission to the ER, DPHI, Sydney Water (if connection to a Sydney Water asset is required), and EPA (upon request).

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
				The SSTOM Groundwater CMR 4, dated 30/4/2026 covers the period July 2025 to February 2026 and was submitted to DPHI on 30/4/2026, within the 6-monthly timeframe (SSTOM NVCMR 3 was submitted to DPHI on 29/10/2025). The SSTOM Groundwater CMR 4 was submitted to DCCEEW Water and Sydney Water on 8/5/2026, generally within the 6-monthly timeframe required.

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
PART E KEY ISSUE CONDITIONS				
AIR QUALITY				
E1	All reasonably practicable measures must be implemented to minimise the emission of dust and other air pollutants during construction.	• Site inspection, 3/8/2026 • Interview with Auditees, 11/02/2026 • Complaints Register February-July 2026	**C**	Dust suppression measures were observed during the site inspection including hoses, wheel washes, application of polymer; shotcreting of batters, and the use of water carts. Site accesses were mainly constructed with hardstand, or stabilised with rumble grids in place. Application of to batters was observed at Linewide sites. There were no odours detected during the audit site inspection. A new spray wheel wash had been installed at the SMF, replacing the previous water bath wheel wash that was in place, reducing the risk of dirty water tracking off site. Water carts were available and in use at the time of the site inspection along internal access roads. Sweepers were observed in use on internal hardstand accesses and on adjoining public roads, effectively reducing tracking. Auditees explained the process in place that would trigger stop works due to dust risk. If the wind speed is >54km/h, (e.g. 17/1/25), a visual inspection is undertaken and a formal Observation is raised. Observations of water cart use, visible dust and construction activities had been raised. Works are stopped if dust is excessive / at risk of leaving the site boundary. PLM has committed to the ongoing review and management of haul roads. Dust risk from haul roads was not raised as a significant issue during IA6, and the stabilisation of internal haul roads was noted to have progressively improved since IA3. SMF Linewide portions and Orchard Hills station have been identified as the SM-WSA sites with the highest potential for dust emissions. During the audit site inspection polymer was observed to have been applied to batters, and some batters were stabilised with shotcrete. These sites are transitioning out of the earthworks phase, resulting in a reduced dust risk. The dust risk at these sites is likely to increase again once the civil works scope commenced. It is noted that decommissioning of the concrete batching plant at Orchard Hills Station has reduced overall dust risk at this site. There were no dust complaints received during the IA6 audit period.

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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
BIODIVERSITY AND TREES				
Biodiversity Credits				
E2	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities and threatened species habitat.	• Interview with Sydney Metro & ParkLife Metro, 11/2/2026 • Flora and Fauna Management Plan, Rev 04, 12/11/2025 • Site inspection, 3/8/2026 • PLM Permit to Clear Land or Vegetation Register Extract, provided 13/3/2026 • **Pre-Clearing Reports:** • Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 • PLM Pre-clearing Tree Inspection Report (Portion 3, Cosgrove Creek), dated 6/11/2024 • PLM Pre-clearing Inspection Checklist and Permit, Cosgrove Creek Boreholes, dated 22/11/2024 • PLM Pre-clearing Inspection Checklist, Portion 3 Linewide, dated 1/12/2025 • Pre-clearing survey form, Bridges Cosgroves Creek Portion 3, Leneco, dated 25/11/2024 • Wolfpeak Pre-clearing Inspection for Patons Lane, Orchard Hills, dated 14/1/2025 • Wolfpeak Pre-clearing Tree Inspection Report, Portion 4 via Elizabeth Drive Compound, dated 5/3/2025 • Wolfpeak Pre-clearing Tree Inspection Report, Off-Airport Locations, OHE, Blaxland Creek & Defence-South Patons Lane Rev4, dated 25/6/2025 • Wolfpeak Pre-clearing Tree Inspection Report, Off-Airport Locations, Linewide **Portion 3** Rev1, dated 24/11/2025 • Wolfpeak Pre-clearing Tree Inspection Report, **Samuel Marsden Road** Rev3, dated 12/2/2026 • **Post-Clearance Reports:** • PLM Post-clearing Report, Cosgroves Creek Boreholes, dated 28/11/2024 • Post-clearance Report_20260105_Rev.1.pdf • Wolfpeak Post-clearance Report, Study Aerea 4 Orchard Hills, dated 11/11/2025 • Wolfpeak Post-clearance Report, Portion 4 Linewide, dated 13/11/2025 • WolfPeak Post-clearance Report, Pre-clear Survey and Clearing Supervision for trees at Portion 1 Blaxland creek, Cosgrove Creek and Portion 3 South of Patons lane dated 5/1/2026 • Wolfpeak Post-clearance Report_SMF, dated 26/5/2025 • AMBS Post-Clearing Report **Samuel Marsden Road** - March 2026, dated 11/5/2026 • **Tree Clearing Permits:** • Permit PLM-PCGV-015, Cosgrove Creek, dated 3/12/2025 • PLM Pre-Clearing and Grubbing Permit No. 19, **Samuel Marsden Road**, dated 11/3/2026	**C**	The clearing of the majority of trees for the SM-WSA corridor was undertaken by SCAW prior to the SSTOM works commencing. During clearing and grubbing SCAW collected and stored separately any useful removed landscape materials for re-use in the project in fauna crossings, etc. During the IA5 audit period tree clearing was undertaken at Cosgrove's Creek in Portion 3 Linewide (PCT) to facilitate an Active Transport Corridor (ATC) bridge crossing. Tree removal to facilitate geotechnical investigations in the same area was undertaken in November 2024. Clearing was of 0.05ha of PCT 1800, and potential habitat for the Southern myotis and a total of 358 trees were removed during tree clearing activity at Portion 1C Linewide, Blaxland Creek, and Cosgrove Creek. Wolfpeak reported "*no meaningful fauna habitat was identified during felling and no fauna was encountered*". A Pre-clearing inspection was undertaken by Leneco for the Cosgrove's Creek area as a whole, dated 20/9/2024 and PLM conducted a pre-clearance inspection prior to the tree removal for geotechnical works, dated 6/11/2024, and another prior to the additional tree removal works, dated 1/12/2026. A Tree Removal Permit was prepared by PLM for the additional Cosgrove Creek tree clearing works which was dated 3/12/2025, for works from 3/12/2025 to 4/12/2025. A Post-clearance inspection for sites including Portion 1 Blaxland Creek, Cosgrove Creek and Portion 3 South of Patons Lane was prepared by WolfPeak, dated 5/1/2026. The Post-clearance inspection report confirms ecologist supervision was undertaken during tree removal, and confirms that an ecologist inspection was undertaken before the daily commencement of clearing works to search for Koalas and to locate and flag any habitat features such as tree hollows, bird nests and possum dreys. In addition to Cosgrove Creek, tree clearing was also undertaken in the following locations during the IA5 audit period: • Portion 4 Linewide: To facilitate CSR works, dated 29/10/2025 • Kent Road, Orchard Hills: To facilitate future road widening, dated 29/10/2025. Clearing involved the removal of hollow-bearing trees. Nest boxes had previously been placed in a nearby area of vegetation south of Kent Road to offset the tree hollow loss. • Portion 1 Linewide: To facilitate the ATC bridge crossing at Blaxland Creek, dated 2/12/2025 • Portion 1 Linewide: To facilitate construction of another section of the ATC, dated 5/12/2025 • Portion 3 Linewide: To facilitate the installation of security fencing, dated 5/2/2026 During the IA6 audit period, two trees were removed from Samual Marsden Road, Orchard Hills associated with the CA at Orchard Hills Station for connection of the sewer main. A Pre-clearing Tree Inspection Report was prepared and provides credit offset calculations for all proposed clearing of Plant Community Types (PCTs) and specific listed species. ABMS were engaged to supervise tree removal on 11/3/2026 and provided a Post-Clearing Report confirming no hollows were found during the post-clearing inspection thus no nest boxes are required to mitigate habitat loss.
E3	Impacts to plant community types must not exceed those identified in the documents listed in **Condition A1**, unless otherwise approved by the Planning Secretary. In requesting the Planning Secretary's approval, an assessment of the additional impact(s) to plant community types and an updated ecosystem and / or species credit requirement under **Condition E4** below, if required, must be provided.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Flora and Fauna Management Plan, Rev 04, 12/11/2025 • Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 • PLM Pre-clearing Inspection Checklist and Permit, Cosgrove Creek Boreholes, dated 22/11/2024 • PLM Post-clearing Report, Cosgroves Creek Boreholes, dated 28/11/2024 • PLM Permit to Clear Land or Vegetation Register Extract, Permit PLM-PCGV-015, Cosgrove Creek, dated 3/12/2025 • WolfPeak Post-clearance Report, Pre-clear Survey and Clearing Supervision for trees at Portion 1 Blaxland creek, Cosgrove Creek and Portion 3 South of Patons lane dated 5/1/2026 • Pre-clearing survey form, Bridges Cosgroves Creek Portion 3, Leneco, dated 25/11/2024 • Wolfpeak Pre-clearing Tree Inspection Report, Samuel Marsden Road Rev3, dated 12/2/2026 • AMBS Post-Clearing Report Samuel Marsden Road - March 2026, dated 11/5/2026 • PLM Pre-Clearing and Grubbing Permit No. 19, Samuel Marsden Road, dated 11/3/2026	**C**	The existing environment had been significantly altered by the time of handover to the SSTOM package contractor and ecosystem credits had been retired. In a letter to DPHI, dated 13/5/2024, in relation to the retirement of additional credits per **Condition E3**, Sydney Metro submitted evidence of payment to the Biodiversity Conservation Fund (BCF) prior to removal of native vegetation along Kent Road associated with utility works for the SSTOM construction stage. The letter refers to an attached certificate (BCF295) issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the *Biodiversity Conservation Act 2016* (BC Act) as evidence of payment into the BCF in satisfaction of **CoA E5** as it relates to the SSTOM construction stage. The letter also notes "*the BCF payment documented in the section 6.33 certificates only relate to the additional credits sought under **CoA E3** per the Departments approval ... Should SMWSA need to retire further credits for their works, another submission to the Department would be made*". Refer to **Condition E2** for details on tree removal works and pre-and post-clearance inspections conducted by SSTOM during the audit period. SSTOM was initially allocated one biodiversity credit for PCT 724, one biodiversity credit for PCT 1800, and one biodiversity credit for PCT Southern Myotis. Biodiversity offset credits are calculated by the ecologist engaged to conduct pre-clearance inspections at each proposed tree removal location. Biodiversity offset credit calculations are conducted in accordance with the approved Biodiversity Development Assessment Report (BDAR) and client-requested modifications subsequently approved by the NSW Government. Each proposed tree removal area has distinct calculations for Biodiversity offset credits, given the varied PCTs and their conditions as well as the presence or absence of listed species and assumed fauna habitats. Credit calculations are used to generate offset calculations. Refer **Conditions E4 & E7** for more information. *Trees removed on Samuel Marsden were part of a PCT. 846 credits were allocated for off-airport and the project has 345 remaining (based on the numbers in the EIS). Purchase of credits has been on an as-needs basis.*

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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-l ke) must be retired. ***Note:*** *Credits have been calculated using the Biodiversity Assessment Method.* **Table 3: Ecosystem credits** **Plant Community Type (PCT) ID and name** / **Number of Credits** 724: Broad-leaved Ironbark – Grey Box – Melaleuca decora grassy open forest on clay/gravel soils of the Cumberland Plain, Sydney Basin Bioregion — 246 835: Forest Red Gum – Rough-barked Apple grassy woodland on alluvial flats of the Cumberland Plain, Sydney Basin Bioregion — 217 849: Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion — 202 204 1800: Swamp Oak open forest on riverflats of Cumberland Plain and Hunter Valley — 151 **TOTAL** — ~~846 848~~ **Table 4: Species credits required** **Species** / **Number of Credits** ~~Acacia bynoeana (Bynoe's Wattle)~~ — ~~11~~ ~~Acacia pubescens (Downy Wattle)~~ — ~~64~~ ~~Allocasuarina glareicola~~ — ~~47~~ ~~Cynanchum elegans (White-flowered Wax Plant)~~ — ~~15~~ ~~Dillwynia tenuifolia~~ — ~~21 72~~ Grevillea juniperina subsp. juniperina (Juniper-leaved Grevillea) — 67 453 ~~Grevillea parviflora subsp. parviflora (Small-flower Grevillea)~~ — ~~32~~ ~~Microlaena stipoides subsp. stipoides (Endangered population Meadows and Open Forest in the Wianamatta (South Creek) area)~~ — ~~132~~ ~~Monotaxis macrophylla~~ — ~~42~~ ~~Persoonia nutans (Nodding Geebung)~~ — ~~18~~ ~~Persoonia pinifolia (Pine-leaved Geebung)~~ — ~~33~~ Pultenaea parviflora — 10 31 Meridolum corneovirens — 198 Cumberland Plain Land Snail Myotis Macropus (Southern Myotis) — 292 **TOTAL SPECIES CREDITS** — ~~339 1,111~~	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Flora and Fauna Management Plan, Rev 04, 12/11/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 • Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 25/2/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 21/8/2025 • Post Approval Form PA-659 SM-WSA Evidence of the retirement of credits_Lodged 22/8/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 20/10/2025 • Post Approval Form PA-634 SM-WSA Evidence of the retirement of credits_Lodged 21/10/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 25/2/2026 • Post Approval Form PA-692 SM-WSA Evidence of the retirement of credits_Lodged 26/2/2026 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 15/5/2026 • Post Approval Form PA-727 SM-WSA Evidence of the retirement of credits_Lodged 15/5/2026	**C**	Ecosystem credits have been retired prior to impact during previous construction activities. The first SSTOM package had an unexpected find (PCT 724) and Sydney Metro sought to increase the number of biodiversity credits. This was requested on 30/4/2024 and approved by DPHI on 9/5/2024 (ref: SSI-10051-PA-404). On 13/5/2024 Sydney Metro issued a letter to DPHI summarising **Condition E3** biodiversity credit allocation and submission of proof of retirement credits. On 28/10/2024 and 25/2/2025 Sydney Metro issued further letters to DPHI submitting evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with enabling works for the SSTOM construction stage. Certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the *Biodiversity Conservation Act 2016* (BC Act) were attached to the letters as evidence of payment into the BCF. Retirement credit reports issued by the BCT were also attached to the letter as evidence of retirement of credits in satisfaction of **Condition E5**. **NB**: *The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the SM-WSA, not only SSTOM.* As per the FFMP, Section 6.3, any approved biodiversity offsets allowed for in the SSTOM Works footprint and contained in **Condition E4** or **E8** will be monitored and tracked by the Parklife Metro D&C Environment Manager during construction. Sydney Metro is responsible for the requirements of **Condition E4, E5, E6** and **E7** and will offset any residual impacts to Key Fish Habitat in accordance with the Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013 update) in accordance with **Conditions E8, E9** and **E10**. SSTOM was initially allocated one biodiversity credit for PCT 724, one biodiversity credit for PCT 1800, and one biodiversity credit for PCT Southern Myotis. Letters were submitted to DPHI on 22/8/2025, 20/10/2025, 26/2/2026 and 15/5/2026 to allocate surplus credits already retired from SCAW to SSTOM. New credits had to be purchased for a BCF agreement and to retire credits under a sales agreement. The credits were utilised for clearing at Kent Road, Orchard Hills, and Portion 1 & 3 Linewide. In accordance with **Conditions E4, E5 and E7** of SSI 10051 Mod 2 and as per the Staging Report, Sydney Metro submitted evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with enabling works for the SSTOM construction stage. The submission included certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the *Biodiversity Conservation Act 2016* (BC Act) as evidence of payment into the BCF. Also attached were the retirement credit reports issued by the BCT as evidence of retirement of credits in satisfaction of **Condition E5**. The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the Sydney Metro – Western Sydney Airport project and does not solely cover the SSTOM construction stage.
E5	The requirement to retire like-for-like ecosystem credits and species credits in **Condition E4** may be satisfied by payment to the Biodiversity Conservation Fund of an amount equivalent to the number and classes of ecosystem credits and species credits.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Flora and Fauna Management Plan, Rev 04, 12/11/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 • Leneco Tree Survey and Pre-clearing Assessment, Cosgroves Creek Bridge, dated 20/9/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 25/2/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 21/8/2025 • Post Approval Form PA-659 SM-WSA Evidence of the retirement of credits_Lodged 22/8/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 20/10/2025 • Post Approval Form PA-634 SM-WSA Evidence of the retirement of credits_Lodged 21/10/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 25/2/2026 • Post Approval Form PA-692 SM-WSA Evidence of the retirement of credits_Lodged 26/2/2026 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 15/5/2026 • Post Approval Form PA-727 SM-WSA Evidence of the retirement of credits_Lodged 15/5/2026	**C**	Section 4 of the FFMP refers to BDAR, EIS and Submissions Report. The existing environment had been significantly altered by the time of handover to SSTOM package contractor and ecosystem credits had been retired. On 28/10/2024, 5/2/2025, 21/8/2025, and 20/10/2025, Sydney Metro issued further letters to DPHI submitting evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with SSTOM. Certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the *Biodiversity Conservation Act 2016* (BC Act) were attached to the letters as evidence of payment into the BCF. Retirement credit reports issued by the BCT were also attached to the letter as evidence of retirement of credits in satisfaction of **Condition E5**. **NB**: *The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the SM-WSA , not only SSTOM.* The maximum number of credits has been purchased - (as managed by the Sydney Metro Planning team). At this stage it is not expected that more credits would be required. Refer **Condition E7** for more information.
E6	Where evidence of compliance with the Ancillary rules: Reasonable steps to seek l ke-for-like biodiversity credits for the purpose of applying the variation rules has been provided to the Planning Secretary, variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Report (Variation).	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Flora and Fauna Management Plan, Rev 04, 12/11/2025	**NT**	The existing environment had been significantly altered by the time of handover to the SSTOM package contractor and ecosystem credits had been retired. Noting SSTOM have triggered the requirements for biodiversity offsets (Oct 2024 and Feb 2025), these credits have come from Sales Agreements of Biodiversity Conservation Fund (BCF) payments for the PCTs that exist and not credit retirements for new PCTs. Evidence of this has been provided via **Condition E7** documentation. Therefore, this condition has not been triggered during the reporting period. For context, it was "switched on" for SSTOM as part of the Rev 10 Staging Report update in case it was required for possible future works.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E7	Evidence of the retirement of credits in satisfaction of **Condition E4** or payment to the Biodiversity Conservation Fund in satisfaction of **Condition E5** must be provided to the Planning Secretary prior to impacts on the biodiversity values.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Flora and Fauna Management Plan, Rev 04, 12/11/2025 • Letter from SM to DPHI RE: Condition E7 - Evidence of the retirement of credits or payment to secure offsets, dated 13/5/2024 • Post Approval Form_20240514005704, SSTOM - CoA E7 letter, DPHI Submission, dated 14/5/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 • DPHI Submission (PA-511) - Evidence of the retirement of credits or payment to secure offsets, dated 28/10/2024 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 5/2/2025 • Post Approval Form_20250207002021, SM-WSA Evidence of the retirement of credits, DPHI Submission, dated 7/2/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 21/8/2025 • Post Approval Form PA-659 SM-WSA Evidence of the retirement of credits_Lodged 22/8/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 20/10/2025 • Post Approval Form PA-634 SM-WSA Evidence of the retirement of credits_Lodged 21/10/2025 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 25/2/2026 • Post Approval Form PA-692 SM-WSA Evidence of the retirement of credits_Lodged 26/2/2026 • Letter from SM to DPHI RE: Condition E4, E5 & E7 - Evidence of the retirement of credits or payment to secure offsets, dated 15/5/2026 • Post Approval Form PA-727 SM-WSA Evidence of the retirement of credits_Lodged 15/5/2026	C	The existing environment had been significantly altered by the time of handover to the SSTOM package contractor and ecosystem credits had been retired. In a letter to DPHI, dated 13/5/2024, in relation to the retirement of additional credits per **Condition E3,** Sydney Metro submitted evidence of payment into the Biodiversity Conservation Fund (BCF) prior to removal of native vegetation along Kent Road associated with utility works for the SSTOM construction stage. The letter refers to an attached certificate (BCF295) issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the *Biodiversity Conservation Act 2016* (BC Act) as evidence of payment into the BCF in satisfaction of **Condition E5** as it relates to the SSTOM construction stage. The letter also notes *"the BCF payment documented in the section 6.33 certificates only relate to the additional credits sought under* ***CoA E3*** *per the Departments approval ... Should SMWSA need to retire further credits for their works, another submission to the Department would be made"*. On 28/10/2024, 5/2/2025, 21/8/2025, and 20/10/2025, Sydney Metro issued further letters to DPHI submitting evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with SSTOM. Certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the *Biodiversity Conservation Act 2016* (BC Act) were attached to the letters as evidence of payment into the BCF. Retirement credit reports issued by the BCT were also attached to the letter as evidence of retirement of credits in satisfaction of **Condition E5**. NB: *The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the SM-WSA , not only SSTOM.* In accordance with **Conditions E4, E5 and E7** of SSI 10051 Mod 2 and as per the Staging Report, Sydney Metro submitted evidence of retirement of credits, or payment into the Biodiversity Conservation Fund (BCF), prior to removal of native vegetation associated with enabling works for the SSTOM construction stage. The submission included certificates issued by the Biodiversity Conservation Trust (BCT) under section 6.33 of the Biodiversity Conservation Act 2016 (BC Act) as evidence of payment into the BCF. Also attached were the retirement credit reports issued by the BCT as evidence of retirement of credits in satisfaction of Condition E5. The BCF payment documented in the section 6.33 certificates and the credit retirement reports relates to the whole of the Sydney Metro – Western Sydney Airport project and does not solely cover the SSTOM construction stage. Tree removal for the Samuel Marsden Road sewer works was undertaken on 11/3/2026. An additional **Condition E7** letter was submitted to DPHI on 25/2/2026 for the reallocation of surplus SCAW retired credits to the SSTOM construction stage. The **Condition E7** letter was issued to DPHI on 15/5/2026 for the purchase of additional credits consisting of three new Cumberland Land Snail credits for permanent basins at Orchard Hills (yet to be cleared at the time of IA6). BCF payment receipts were sighted and attached to the **Condition E7** letters.
Key Fish Habitat				
E8	The Proponent must minimise impacts to Key Fish Habitat (**KFH**) as defined in *Policy and Guidelines for Fish Habitat Conservation and Management* (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 *Policy and Guidelines for Fish Habitat Conservation and Management* (DPI, 2013 update) and in consultation with DPI Fisheries.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • EWMS 005 - Works adjacent to or in Waterways_Rev2, dated 21/8/2025 • Letter from DPIRD Fisheries to PLM RE: Consultation - Proposed works in waterways and temporary water crossings - Cosgrove Creek, Blaxland Creek and two unnamed waterways - SMWSA Project, dated 24/10/2025 • AMBS Letter RE: PLM Blaxland Creek Dewatering - January 2026, dated 10/3/2026	C	Works triggering **Condition E8** were commenced during the IA5 audit period and continued into the IA6 audit period including creek crossings at Bridge 1 (Unnamed tributary of Blaxland Creek, Linewide Portion 1), Bridge 2 (Blaxland Creek, Linewide Portion 1), and Bridge 3 (Cosgrove Creek, Linewide Portion 3). An Environmental Work Method Statement (EWMS) was prepared for the creek crossings and consultation undertaken with DPIRD Fisheries. DPIRD Fisheries confirmed Blaland, Cosgrove and an unnamed creek are 4th order permanent or intermittent creeks with clearly defined beds and banks, with evidence of fish habitat. As such, these waterways are identified as Class 2, moderate or Class 3 minimal KFH waterways in accordance with the national fish friendly crossing guidelines *Why Do Fish Need to Cross the Road?*. General environmental mitigation measures were also provided, including (but not limited to): *"No complete blockage of fish passage; Works to be undertaken during low flows"*. The EWMS and consultation provide evidence of minimisation of impacts to Key Fish Habitat (KFH). There are no known requirements to offset impacts to KFH for the SSTOM creek crossings. During IA6, on 13/1/2026 AMBS Ecology and Heritage Pty Ltd supervised the dewatering of a section of Blaxland Creek in accordance with the Parklife Metro Flora and Fauna Management Sub-Plan (SSTOM) Dewatering Procedure. One Eastern Long-necked Turtle (*Chelodina longicollis*) was captured during the creek dewatering. The turtle appeared in good health and was released approximately 50 metres downstream from the dewatered area. It freely swam away upon release.
E9	Where offsets are required in accordance with **Condition E8**, payment of the habitat offset requirement must be made to the DPI Fish Conservation Trust Fund prior to the commencement of Work that impacts **KFH**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026	NT	There are no known requirements to offset impacts to KFH for the Cosgrove and Blaxland Creek crossings, and offsets are unlikely to be triggered for SSTOM.
E10	Where offsets are required in accordance with **Condition E8**, the Proponent must submit to the Planning Secretary a receipt confirming payment to the DPI Fish Conservation Trust Fund within one (1) month of making the payment.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026	NT	There are no known requirements to offset impacts to KFH for the Cosgrove and Blaxland Creek crossings, and offsets are unlikely to be triggered for SSTOM.

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Nest Boxes				
E11	Nest Boxes must be installed one (1) month prior to any removal of existing tree hollows and/or the release of any captured hollow dependent fauna.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • ABMS Letter RE: Parklife Metro Nest Box Monitoring - February 2026, dated 31/3/2026	C	Monitoring of nest boxes has been inherited by SSTOM at Linewide North (for Kent Rd, Orchard Hills tree removal) and Bringelly. Six-monthly nest box monitoring commenced in mid-February 2025, and the 1st monitoring report was provided as evidence, dated 11/4/2025. The 2nd round of nest box monitoring was undertaken by AMBS in July 2025. Twenty nest boxes were occupied at the time of the inspection. An additional 45 nest boxes showed evidence of current or previous use, though no animals were present at the time of monitoring. Of these, 21 boxes contained nests likely belonging to Common Mynas and 20 boxes contained nests likely belonging to Common Starlings. Overall, this represents an occupancy rate of 23.9% for native species and 42.7% for introduced species. A further round of nest box monitoring was carried out in February and March 2026 and the report was sighted as evidence. Nine nest boxes were occupied. ABMS reported "*58 nest boxes showed evidence of current or previous use by vertebrates, though no animals were present at the time of monitoring. Of these, 25 boxes contained signs of presence from native species, including the Common Brushtail Possum, Rainbow Lorikeet, Eastern Rosella, Red-rumped Parrot, Galah, Little Corella, and Australian Wood Duck. Signs of introduced species included four boxes with signs of presence of the Black Rat, 30 boxes with signs of presence that are likely attributed to the Common Myna, and 13 boxes with signs of presence that are likely attributed to the Common Starling. Overall, this represents an occupancy rate of 21% for native species and 39% for introduced species … this monitoring program highlights the ongoing challenge of providing effective supplementary hollows in disturbed, fragmented landscapes*".
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 poss ble for the CSSI to reuse removed native trees and vegetation, the Proponent must consult with the relevant council(s), NSW National Parks & Wildlife Service, Western Sydney Parklands Trust, Greater Sydney Local Land Services, Landcare groups, DPI Fisheries and any additional relevant government agencies to determine if: (a) hollows, tree trunks (greater than 25-30 centimetres in diameter and 2-3 metres in length), mulch, bush rock and root balls salvaged from native vegetation impacted by the CSSI; and (b) collected plant material, seeds and/or propagated plants from native vegetation impacted by the CSSI, could be used by others in habitat enhancement and rehabilitation work, before pursuing other disposal options.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Stage 2 Place, Urban Design and Corridor Landscape Plan (PUDCLP) RevF v2, 9/12/2024 • Tree Survey Register, August 2026	NT	Vegetation removed by PLM is being stockpiled for later use during rehabilitation of the CSSI. At this stage the project envisages that trees and vegetation can be reused on the project so alternate avenues for reuse have not been pursued. As documented in the Stage 2 PUDCLP: "*The clearing of trees for the construction of the rail alignment within the corridor was undertaken by SCAW prior to the SSTOM works commencing. During the clearing and grubbing SCAW collected and stored separately any useful removed landscape materials for re-use in the project in fauna crossings, etc. This collected and stored landscape material from SCAW has been reviewed by SSTOM and incorporated into the landscape design of the SSTOM project for use in the fauna crossings, etc. At this stage of the project Parklife Metro does not have access to the nominated project site to undertake a tree survey and this access is not granted until significantly after the submission of this Stage 2 PUDCLP. As such, Parklife are not able to confirm if there are any existing trees or vegetation that need to be removed. However, surveys and consultation will be undertaken with the relevant authorities once site access is granted. It is noted that this will be undertaken prior to proceeding with construction works*". A tree survey/register was available during IA6 and included SSTOM trees removed during the project. NB: While the Stage 2 PUDCLP states "*At this stage of the project Parklife Metro does not have access to the nominated project site to undertake a tree survey and this access is not granted until significantly after the submission of this Stage 2 PUDCLP. As such, Parklife are not able to confirm if there are any existing trees or vegetation that need to be removed. However, surveys and consultation will be undertaken with the relevant authorities once site access is granted. It is noted that this will be undertaken prior to proceeding with construction works.*", it is noted that design changes have resulted in the requirement for tree clearing to be undertaken by SSTOM, which is not reflected in the Stage 2 PUDCLP.
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 & ParkLife Metro, 5/8/2026 • Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP) Ver 0, November 2023 • Stage 2 Place, Urban Design and Corridor Landscape Plan (PUDCLP) RevF v2, 9/12/2024 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • Tree Survey Register, August 2026	NT	As per Section 1.6 of the Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP), the clearing of trees for the corridor was undertaken by SCAW prior to the SSTOM works commencing. Section 1.5.2 of the PUDCLP states "*The provision of replacement trees is a key outcome of the project. New tree planting is to be at a ratio of 2:1, except trees that are offset under Condition E4 (biodiversity credits). This requirement will be addressed in the Corridor Landscape Master Plan in the future Stage 2 SSTOM PUDCLP*". The SSTOM project has been left with felled hollow-bearing trees from SCAW for reuse as habitat features at the Orchard Hills Station site. A number of trees were removed during the IA5 audit period by SSTOM and have been added to the SCAW stockpiles for reuse by the restoration contractor. **MOD 2** was determined on 20/12/2024 and amends **Condition E13** to decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and **Condition E57** so that information on consultation, respite and out of hours work information be provided to the EPA and Planning Secretary on request. PLM presented a Consolidated Tree Survey for SSTOM as evidence during the audit. The tree survey includes the tree location, species, heights, diameter and GPS coordinates for each tree, and specifies whether the tree has been removed or is approved for removal. Revegetation and tree replacement had not commenced at the time of the audit, and is required prior to the commencement of operation. A tree survey/register was available during IA6 and included SSTOM trees removed from the SMF, Linewide Portion 1 Blaxland Creek & South Patons Lane, Linewide Portion 3 - Cosgrove Creek & South Cosgrove Creek, Orchard Hills Lansdown Rd/Kent Rd, Portion 4, Orchard Hills - Basin, St Marys, Luddenham station carpark, & Samuel Marsden Sewer Works. **NB**: *The process for tracking biodiversity offsets and credits is managed by Sydney Metro and was not considered any further here as is outside the scope of the audit.*

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Watercourse Crossings				
E14	The Proponent must design the watercourse crossings and the east-west regional corridor (Patons Lane) crossing to achieve the following objectives: (a) design of viaducts to retain and minimise clearing/disturbance of native vegetation and maximise native plant growth under the structures, (i) maintain and/or improve riparian/terrestrial connectivity under the viaduct and bridge structures to maximise the corridor function; (ii) maximise the viaduct and bridge structures span over the riparian corridor and/or remnant native vegetation whichever is the widest; (iii) minimise the clearing/disturbance of native vegetation and native riparian vegetation; and (iv) maximise light and moisture penetration under the viaduct and bridge structures to support native plant growth; (b) design of culverts and other crossings incorporate the following into the design to provide for movement of aquatic and terrestrial fauna, (i) elevated "dry" cells to encourage terrestrial movement, and recessed "wet" cells to facilitate the movement of aquatic fauna; (ii) maximise light penetration into the culvert structures; (iii) a naturalised base along the bed of the culvert; and 'fauna furniture' (such as rocks, logs, ropes and ledges) to facilitate fauna movement to maintain connectivity and provide fauna passage; (c) design of scour protection using natural solutions such as the revegetation of banks with local native species; and (d) details of remnant native vegetation including riparian vegetation. The Proponent must consult with DPIE EES, DPI Fisheries and engage suitably qualified experts in fauna crossing design to achieve the outcomes of this condition. ***Note:*** *These design objectives must form part of the Place, Urban Design and Corridor Landscape Plan required under* ***Condition E79***.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Stage 1 Place, Urban Design and Corridor Landscape Plan (PUDCLP) Ver 0, November 2023 • Stage 2 Place, Urban Design and Corridor Landscape Plan (PUDCLP) RevF v2, 9/12/2024 • PUDCLP - Luddenham and SMF (Rev 0)_FINAL for IC	NT	It is understood that **Condition E14** relates mainly to the construction of viaducts, piers etc. and is not applicable to SSTOM.
FLOODING				
E15	The CSSI must be designed and constructed with the objective of not exceeding the flood impacts presented in the documents listed in **Condition A1** or the flood impact criteria in **Table 5**, whichever is greater, within and in the vicinity of the CSSI for all flood events up to and including the one (1) per cent Annual Exceedance Probability (AEP) flood event. **Table 5: Flood Impact Criteria** **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 Land zoned as rural, primary production, environment or public recreation — Maximum 100 mm **Velocity** — 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 the same outcome must be incorporated into the detailed design of the CSSI.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Flood Modelling Report Design Stage 1 Rev A (extract only), dated 6/7/2023 • Flood Modelling Report Design Stage 2 (extract only), dated 17/4/2024 • Flood Modelling Report Design Approved for Construction (extract only), dated 7/11/2025 • SSTOM SWMP, Rev 04, 26/8/2025 • PUDCLP Stage 2	NT	It is understood that the flood design is ongoing. It is the responsibility of the design engineers and nominated review parties as per **Condition E15** to verify compliance with **Condition E15** once all information is made available. Flooding is considered with regard to **Condition E15** during design and construction. The requirements of **Condition E15** relating to design will be addressed in the Design Reports and noted in the approved Soil and Water Management Sub-plan. Examples of design reports showing compliance with flood modelling parameters being met by design were sighted. As per the flood modelling report provided for review, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report. Section 6.1.1.3 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 addressed flood impacts from SSTOM versus Aerotropolis Core Precinct Design and states "*SSTOM accordingly has no responsibility to demonstrate conformance to SSI 10051* ***E15*** *since the impacts outside of the works area are generated by the Precinct Design and the flood mitigations for the Precinct Design are basins outside the limits of SSTOM works*". Section 6 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 addresses compliance with **Condition E15** for a number of locations and scenarios. Table 10 of the PLM Flood Modelling Report Design Stage 2, dated 17/4/2024 sets out assumptions, dependencies and constraints associated with flood modelling. Table 18 of the PLM Flood Modelling Report Approved for Construction, dated 7/11/2025 addresses **Condition E15** and assesses compliance as 'conforming. NB: *It is not the role of the Auditor to ensure flood modelling is completed to meet the requirements of* ***Conditions E15-E18***. *The Auditor relies on statements provided by suitably qualified and experienced flood engineers or other specialists that may be engaged by the project to ensure the project meets compliance with flood-related conditions. Relevant extracts of the PLM flood design reports were reviewed during the audit, which does not constitute a full audit of flood-related requirements, which is the responsibility of the Proponent and Contractor.* The PUDCLP Stage 2 states *"The measures identified in the Environmental Impact Statement (EIS) have been incorporated into the detailed design of the CSSI to limit flooding impacts. The CSSI has been designed in accordance with the project performance outcomes for flooding as well as the mitigation measures identified in the EIS".*

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E16	Updated modelling that incorporates these measures and is calbrated and validated with consideration of the results of the Wianamatta-South Creek Catchment Flood Assessment prepared by Infrastructure NSW as part of Stage 2 of the South Creek Sector Review must be prepared by a suitably qualified flood consultant. The modelling must identify changes in post-development flood behaviour including cumulative flood impacts associated with Western Sydney International Airport and the M12, where this information is available, prior to detailed design being finalised.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Flood Modelling Report Design Stage 1 Rev A 6/7/2023 • Flood Modelling Report Design Stage 2, dated 17/4/2024 • SSTOM SWMP, Rev 04, 26/8/2025	NT	As per the flood modelling report, there are no departures or concessions applicable. It is noted that further compliance review is to be undertaken in future revisions of the flood modelling report as design is finalised. As per Section 3.5, Table 10 of the Flood Modelling Report Design Stage 2, dated 17/4/2024, *"certified FIW models from SBT & SCAW Contracts are provided to SSTOM. Accordingly, SSTOM is dependent on the inherited Flood Models and prior conformance documented by the SCAW/SBT reports to CoA E16 which is applicable to all Construction contracts for SM-WSA".* *"It is noted that the SCAW permanent design scenario within the inherited SCAW flood model is not amended by SSTOM. SSTOM only amends the permanent design scenario to account for works undertaken by SSTOM. The SSTOM permanent design scenario flood assessment is accordingly the cumulative flood assessment of SBT, SCAW and SSTOM works. The SCAW inherited flood model (dependency) is: SMWSASCA-CPU-SWD-EW000-SD-M3D245000.A.S3.A.01.zip & SMWSASCA-CPU-SWD-EW000SD-M3D-245001.A.S3.A.01.zip received March 2023. Regarding to the Flood Modelling undertaken by SBT, SCAW and WSI provided to SSTOM by SM. SSTOM assumes that: * Flood modelling provided to SSTOM by SM is fit for purpose of the SM-WSA Project * Flood modelling provided to SSTOM by SM is conforming to the SSI CoA and PS requirements applicable the prior model development".* **NB:** *It is not the role of the Auditor to ensure flood modelling is completed to meet the requirements of* ***Conditions E15-E18****. The Auditor relies on statements provided by suitably qualified and experienced flood engineers or other specialists that may be engaged by the project to ensure the project meets compliance with flood-related conditions. Relevant extracts of the PLM flood design reports were reviewed during the audit, which does not constitute a full audit of flood-related requirements, which is the responsibility of the Proponent and Contractor.*
E17	Where flooding characteristics exceed the levels identified in **Condition E15** above the Proponent must undertake the following: (a) consult with affected landowners for properties adversely flood affected as a result of the CSSI regarding appropriate mitigations; and (b) consult with the NSW State Emergency Service (SES) and Relevant Council(s) regarding the management of any continuous and residual flood risk from rarer flood events larger than the 1 per cent AEP and up to the probable maximum flood. In the event that the Proponent and the affected landowner cannot agree on the measures to mitigate the impact as described in **Condition E15**, the Proponent must engage a suitably qualified and experienced independent person to advise and assist in determining the impact and relevant mitigation measures.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Flood Modelling Report Design Stage 1 Rev A 6/7/2023 • Flood Modelling Report Design Stage 2, dated 17/4/2024 • SSTOM SWMP, Rev 04, 26/8/2025	NT	This condition has not been triggered to-date for the SSTOM package. **Condition E17** provides a mechanism to mitigate floodplain impacts which are non-conforming to the **E15** flood impact criteria. According to the Flood Modelling Report Design Stage 2, dated 17/4/2024, the project is conforming to **Condition E15**.
E18	Flood information including flood reports, models and geographic information system outputs must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and the SES in order to assist in preparing relevant documents and to reflect changes in flood behaviour as a result of the CSSI. The DPIE PDPS, Relevant Council(s), DPIE EES and the SES must be notified in writing that the information is available no later than one (1) month following the completion of construction. Information requested by the DPIE PDPS, Relevant Council(s), DPIE EES or the SES must be provided no later than six (6) months following the completion of construction or within another timeframe agreed with the DPIE PDPS, Relevant Council(s), DPIE EES and the SES. The project flood models and data must be uploaded to the NSW Flood Data Portal and access must be provided to the DPIE PDPS, Relevant Council(s), DPIE EES and SES no later than one (1) month following the completion of construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Flood Modelling Report Design Stage 1 Rev A 6/7/2023 • Flood Modelling Report Design Stage 2, dated 17/4/2024 • SSTOM SWMP, Rev 04, 26/8/2025	NT	This condition has not been triggered as construction is still underway.
HERITAGE				
NON-ABORIGINAL HERITAGE				
E19	The Proponent must not destroy, modify or otherwise physically affect any Heritage item not identified in documents referred to in **Condition A1**. Unexpected heritage finds identified by the CSSI must be managed in accordance with the Unexpected Heritage Finds and Human Remains Procedure outlined in Conditions E34 to E36. Consideration of avoidance and redesign to protect unexpected finds of state heritage significance must be addressed where this condition applies.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Non-Aboriginal Heritage Management Plan (NAHMP), Rev 03, 1/12/2025	C	Section 4 of the Non-Aboriginal Heritage Management Plan (NAHMP) lists Non-Aboriginal heritage items that could potentially be impacted by the SSTOM works. There has been no known damage to Heritage items during the project, and no unexpected heritage finds encountered during the audit period.
E20	The dismantling and reassembly of the jib crane at St Marys Station, if required, must only be undertaken under the supervision of a consultant experienced in the conservation of heritage machinery.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Non-Aboriginal Heritage Management Plan (NAHMP), Rev 03, 1/12/2025	NT	Management of the jib crane at St Marys is set out in Section 6.8.1 of the NAHMP, and would require preparation of a detailed methodology should the jib crane require relocation. Exclusion zones are set out in Section 6.11 of the NAHMP and will include the jib crane and Goods Shed within the St Marys Railway Station Group. It is understood that disassembly of the j b crane may be required for SSTOM after the Temporary Bus Interchange (TBI) is temporarily relocated in February 2027.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E21	The St Marys Goods Shed must not be destroyed, modified or otherwise adversely affected, except as identified in the documents listed in Condition A1.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Non-Aboriginal Heritage Management Plan (NAHMP), Rev 03, 1/12/2025	C	No damage has reportedly occurred to the St Marys Goods Shed during the audit period. Exclusion zones are set out in Section 6.11 of the NAHMP and will include the j b crane and Good Shed within the St Marys Railway Station Group. Future works involve archaeological investigation which may be within the exclusion zone. Construction in the area is scheduled for 2027, with archaeological investigation works scheduled to commence in mid-August 2026.
E22	The **Archaeological Research Design** included in the documents listed in **Condition A1** must be implemented during construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro – Western Sydney Airport Non-Aboriginal Archaeological Research Design, Artefact, April 2021 • Non-Aboriginal Heritage Management Plan (NAHMP), Rev 03, 1/12/2025 • St Mary's Goods Shed Archaeological Method Statement, Rev C.2024.1121, December 2024	NT	The Archaeological Research Design (ARD) forms Appendix K to the Submissions Report. The ARD is relevant at St Marys and will form part of the future precinct works for services. The requirement for an Archaeological Method Statement (AMS) on the project are set out in Section 6.6 of the SSTOM NAHMP. An activity-specific AMS has been prepared for SSTOM ground disturbing activities in the area of the St Marys Goods Yard and Shed. Archaeological excavations under the AMS had not commenced at the time of the audit, but are required to be undertaken in accordance with the ARD and Excavation Methodology(s), as set out in Section 6.7 of the NAHMP - Planned for mid-August 2026. Ground disturbing works had not commenced by SSTOM in this area at the time of the audit.
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 *Criteria for Assessment of Excavation Director* (September 2019), to oversee and advise on matters associated with historical archaeology for the approval of the Planning Secretary. The **Excavation Director** must be present to oversee excavation, advise on archaeological issues, advise on the duration and extent of oversight required during archaeological excavations consistent with the **Archaeological Research Design and Excavation Methodology(s)** identified in the documents listed in **Condition A1**. More than one **Excavation Director** may be engaged for CSSI to exercise the functions required under the conditions of this approval.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • 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 SSTOM - Planned for August 2026. An Excavation Director was nominated/approved for the project in a letter from DPHI dated 5/9/2023.
E24	Archival photographic digital recording must be undertaken for all listed heritage items which will be affected by the CSSI. The recordings must be undertaken prior to the commencement of Work which may impact the items and documented in an **Archival Recording Report.** The recordings must include buildings, structures and landscape features and detailed maps showing the location of features. The archival recording must be prepared in accordance with *How to Prepare Archival Records of Heritage Items* (NSW Heritage Office, 1998) and *Photographic Recording of Heritage Items Using Film or Digital Capture* (NSW Heritage Office, 2006).	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 photographic digital recording reports for the St Marys Goods Shed have been prepared. The heritage-listed j b crane is addressed 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 descr bed in the documents listed in Condition A1 in relation to heritage items. Copies of the **Archival Recording Report** must also be provided to relevant local historical societies.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	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 l braries.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 • SSTOM Environmental Control Map (ECM), Linewide Luddenham South, SMWSASSM-PLD-SWD-SW000-EV-ECM-000001, Rev00 dated 8/11/2024 Page 4 of 8	C	In November 2022 a Wa k on Country was undertaken with the Connect with Country Working Group. Two culturally modified trees were identified by the group at Cosgrove Creek, noted by one of the attendees as having been in an area obscured by vegetation and inaccessible due to poor ground conditions and flooding during earlier surveys. The two trees were recorded on 23 November 2022 by Working Group representative Erin Wilkins (Darug Custodial Aboriginal Corporation (DCAC)) and Colin Davison (Sydney Metro Aboriginal Cultural Heritage Advisor). They were subsequently registered in AHIMS as sites Cosgrove Creek scar tree 1 (45-5-5667) and Cosgrove Creek scar tree 2 (45-5-5668). Auditees advised the trees are located within the SSTOM Linewide Portion 3 project boundary but are not within the construction footprint and marked on ECMs. No other AHIMS sites are known to occur within the project boundary. No damage is known to have occurred to the listed Aboriginal cultural heritage sites and works. The scar trees are located about 150m from the Cosgrove Creek crossing / bridge construction works, which commenced during the IA5 audit period. The SSTOM ECM001, Linewide Luddenham South, Rev00 dated 8/11/2024 Page 4 of 8 shows the location of 2 scar trees within a designated Environmental No-Go zone.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E29	The Registered Aboriginal Parties (**RAPs**) must be kept regularly informed about the CSSI. The **RAPs** must continue to be provided with the opportunity to be consulted about the Aboriginal cultural heritage management requirements of the CSSI throughout construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 • Quarterly Registered Aboriginal Party (RAP) update, November 2025 • Six-Monthly Registered Aboriginal Party (RAP) update, July 2026	**C**	Evidence to support ongoing consultation with Registered Aboriginal Parties (RAPs) was provided via the Quarterly or Half Yearly Registered Aboriginal Party (RAP) updates. RAP updates were sighted for November 2025 and July 2026, which included a newsletter. The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil **Condition E32**. The report was prepared by AECOM, in consultation with RAPs. The final report was distributed to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. Section 2 of the report provides an overview of the Aboriginal community consultation undertaken to inform the preparation of the project's original and revised ACHARs, as well as the off-airport ACHMP. RAP participation in the SM-WSA salvage program is also detailed. No Aboriginal cultural heritage test and salvage excavations have been undertaken for SSTOM.
E30	The **Aboriginal Cultural Heritage Management Plan** included in the documents listed in **Condition A1** must be updated to include: (a) a methodology for the completion of pedestrian surveys for all areas within the project footprint yet to be surveyed; (b) procedures for undertaking further test excavation and, if necessary, salvage excavations prior to the commencement of works in areas subject to further test excavation; (c) mapping that clearly outlines all areas yet to be subject to survey, test excavations, and salvage excavations; (d) a procedure to update mapping following the completion of survey, test excavations, and salvage excavations that detail the archaeological works conducted across the project footprint; (e) a procedure for updating the predictive model following the identification of new Aboriginal heritage items; and (f) a procedure to report and update the effectiveness of the following the completion of survey, test excavation activities or significant artefact finds. The updated Plan must be submitted to the Planning Secretary for information prior to works in areas identified for further test excavations. ***Note**: Salvage excavations in the areas identified for salvage in documents in Condition A1, may occur prior to additional test excavations occurring.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 • DPHI Submission (PA-541) Aboriginal Cultural Heritage Management Plan, dated 19/12/2024 • Quarterly Registered Aboriginal Party (RAP) update, November 2025 • Sydney Metro WSA Independent Audit No.5 – Audit Report (SSTOM), GHD February 2024 • Internal correspondence from Sydney Metro, dated 23/7/2026	**C**	A detailed review of the Aboriginal Cultural Heritage Management Plan (ACHMP) was conducted as part of the initial IEA and found to comply with **Condition E30**. The ACHMP was updated to Rev10 on 24/11/2024 and endorsed by the ER on 17/12/2024. Amendment to the plan included: • Update to consultation • Renaming Aerotropolis Station to Bradfield Station • Minor administrative updates The ACHMP was submitted to DPHI on 19/12/2024. Internal correspondence from Sydney Metro, dated 23/7/2026 confirms the ACHMP annual review was undertaken & Rev10 remains effective (no update required).
E31	The updated **Aboriginal Cultural Heritage Management Plan** must be implemented for the duration of salvage activities and construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024	**NT**	The two trees were recorded on 23 November 2022 by Working Group representative Erin Wilkins (Darug Custodial Aboriginal Corporation (DCAC)) and Colin Davison (Sydney Metro Aboriginal Cultural Heritage Advisor). They were subsequently registered in AHIMS as sites Cosgrove Creek scar tree 1 (45-5-5667) and Cosgrove Creek scar tree 2 (45-5-5668). Auditees advised the trees are located within the SSTOM Linewide Portion 3 project boundary but are not within the construction footprint and are marked on ECMs.
E32	At the completion of Aboriginal cultural heritage test and salvage excavations, an **Aboriginal Cultural Heritage Excavation Report(s)** must be prepared by a suitably qualified person. The **Aboriginal Cultural Heritage Excavation Report(s)** must: (a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and (b) document the results of the archaeological test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds). The **RAPs** must be given a minimum of 28 days to consider the report(s) and provide comments before the report(s) is finalised. The final report(s) must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, Gandangara LALC and Deerubbin LALC, the RAPs and local libraries within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024 • Sydney Metro WSA Independent Audit No.5 – Audit Report (SSTOM), GHD February 2024	**C**	The Aboriginal Cultural Heritage Excavation Report for Sydney Metro – Western Sydney Airport was finalised in early March 2024, to fulfil **Condition E32**. The report was prepared by AECOM, in consultation with RAPs. The final report was distr buted to all RAPs registered on the Sydney Metro – Western Sydney Airport project on 8 March 2024. In the report, efforts were documented to salvage archaeological artefacts from four subsurface sites as well as from two surface sites. No Aboriginal cultural heritage test and salvage excavations have been undertaken for SSTOM.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E33	Where previously unidentified Aboriginal objects or places of cultural significance are discovered, all work must immediately stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects or places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the **Unexpected Heritage Finds and Human Remains Procedure** required by **Condition E34** and include registration in the Aboriginal Heritage Information Management System (AHIMS), where required.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024 • ER Endorsement Aboriginal Cultural Heritage Management Plan Rev 10.0, dated 17/12/2024	NT	No previously unidentified Aboriginal objects or places of cultural significance have been discovered for SSTOM.
Unexpected Finds and Human Remains				
E34	An **Unexpected Heritage Finds and Human Remains Procedure** must be prepared to manage unexpected heritage finds (heritage items and values) in accordance with any guidelines and standards prepared by the Heritage Council of NSW or Heritage NSW.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NAHMP, Rev 03, 1/12/2025 • Aboriginal Cultural Heritage Management Plan Rev 9, 7/5/2024	C	The Unexpected Heritage Finds and Human Remains Procedure is included in the ACHMP.
E35	The **Unexpected Heritage Finds and Human Remains Procedure** must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW (with respect to non-Aboriginal cultural heritage) and in relation to Aboriginal cultural heritage, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) and submitted to the Planning Secretary for information no later than one (1) month before the commencement of construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024	C	Unexpected Aboriginal heritage finds are to be managed in accordance with Section 6.24 of Sydney Metro's Unexpected Heritage Finds Procedure [SM-18-00105232], Appendix A to the ACHMP. Unexpected finds are addressed in Section 4.3 of the ACHMP. In November 2022 a Wak on Country was undertaken with the Connect with Country Working Group. Two culturally modified trees were identified by the group at Cosgrove Creek. No unexpected finds of state heritage significance have been encountered, and no unexpected heritage finds were encountered during the audit period.
E36	The **Unexpected Heritage Finds and Human Remains Procedure** must be prepared by a suitably qualified and experienced heritage specialist in consultation with the Heritage Council of NSW (with respect to non-Aboriginal cultural heritage) and in relation to Aboriginal cultural heritage, in accordance with the Code of Practice for Archaeological Investigation of Aboriginal Objects in New South Wales (DECCW 2010) and submitted to the Planning Secretary for information no later than one (1) month before the commencement of construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Aboriginal Cultural Heritage Management Plan Rev 10, 24/11/2024	C	The Unexpected Heritage Finds and Human Remains Procedure is included in the ACHMP.
NOISE AND VIBRATION				
Land Use Survey				
E37	A detailed land use survey must be undertaken to confirm sensitive land use(s) (including critical working areas such as operating theatres and precision laboratories) potentially exposed to construction noise and vibration and construction ground-borne noise. The survey may be undertaken on a progressive basis but must be undertaken in any one area before the commencement of work which generates construction noise, vibration or ground-borne noise in that area. The results of the survey must be included in the **Detailed Noise and Vibration Impact Statements** required under **Condition E47**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 • SSTOM Land Use Survey, Rev 01, 21239.1.1, dated 23/4/2024 • Environment Protection Licence (EPL) 21807	C	The SSTOM CNVMP identifies noise catchment areas (NCAs) and sensitive receivers potentially exposed to project noise. NCAs are identified in Land Use Surveys and classify land uses into: Residential, Commercial, Child Care, Recreational, Education, Industrial, Place of Worship and Shed. Sensitive receiver information is determined via the Land Use Survey in the Detailed Noise and Vibration Impact Assessment (DNVIS). A DNVIS is prepared for each project site to predict the impact of project activities on nearby receivers, including noise and v bration sensitive receivers. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs), which are documented in Section 7.2 of each DNVIS. There were two DNVIS' prepared during the IA5 audit period and assessed out of hours work (OOHW) for the following activities and locations: • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 No new DNVIS' were required to be prepared during the IA6 audit period. A Land Use Survey was prepared for each assessment and forms Appendix B to each DNVIS. The DNVIS' are provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Refer to **Condition E47** for further discussion of the assessment of OOHW and the DNVIS process.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Hours				
E38	Work must only be undertaken during the following hours: (a) 7:00am to 6:00pm Mondays to Fridays, inclusive; (b) 8:00am to 6:00pm Saturdays; and (c) at no time on Sundays or public holidays.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 • Environment Protection Licence (EPL) 21807	**C**	Construction hours are documented in the SSTOM CNVMP and the DNVIS for each project site/activity. The SSTOM Bringelly Service Facility DNVIS, December 2025 predicts impacts related to the following activities for varying Day, Evening and Night periods: • Ventilation - Four (4) fans are proposed to be operational at all times. • Materials Handling - These works will occur at any time and include: • Use of 250 t crane. • Works occurring in laydown areas. • Compound Use - Light and heavy vehicles movements that will occur at all times. • Concreting works - concrete trucks and concrete pumping that will occur at any time. The SSTOM SMF Site Works DNVIS, December 2025 predicts impacts related to the following activities for varying Day, Evening and Night periods: • Combined Services Route (CSR) works including: • CSR works (trenching) - These works are proposed to occur after 6.00pm to 2.00am (Monday to Friday) and 6.00am to 6.00pm (Saturday). • Compound Use (laydown area) – OSOM (Oversized and Overmass) deliveries that will need to occur after 10.00pm (Monday to Saturday). • Truck and Dog material deliveries and bulk earthworks - These works are proposed to extend to include Saturdays 1.00pm to 6.00pm and Monday to Friday 6.00am to 7.00am. • Concrete trucks from OHE (Orchard Hills) - Concrete trucks are proposed via the OHE Concrete Batching Plant after 5.00am to 10.00pm (Monday to Friday). • Track Construction - Proposed during all OOH Periods • Overhead Wiring - Proposed during all OOH Periods • External Building Works - Proposed during all OOH Periods. Includes works at height of building. • Compound Use (carparking) - This includes movement of light vehicles within the carpark during any time period. • Compound Use (laydown area) - This includes movement and unloading of heavy vehicles and is extending to during the OOH day period. • Low Noise Impact Earthworks - Two work areas are assessed (earthworks and stormwater works), to confirm whether or not either of these works can be considered low noise impact as per EPL 5.3. These works are assessed for the period of 7.00am to 8.00am Saturdays. • Power Line (off-Site) - These works are approved to occur along Patons Lane from the Site entry to the substation from 6.00pm to 5.00am. • Concrete and related works as approved within the EPL from 5.00am to midnight (Monday to Friday) and 6.00am to 6.00pm (Saturday) including: • Concrete Pour. • Concrete Finishing. • Formwork Installation and Steel Reinforcement Fixing. No new out of hours works (OOHW) scopes and therefore no new DNVIS' were required to be prepared during the IA6 audit period. OOOHW that continued into the IA6 audit period included (but was not limited to): Concrete pours for station boxes; Beam deliveries at Bradfield and St Mary's, OSOM deliveries; Concrete batching plant operations at Orchard Hills Station; and 24/7 Tunnel fit-out works. Each DNVIS includes a verification of compliance against each applicable SSI 10051 Condition of Approval and EPL Condition and recommends whether the proposed works can be managed to comply with SSI 10051 and the EPL. OOHW takes place as permitted by EPL 21807.

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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Highly Noise Intensive Work				
E39	Except as permitted by an EPL or approved in accordance with the Out-of-Hours Works Protocol required by Condition E42, highly noise intensive work that result in an exceedance of the applicable NML at the same receiver must only be undertaken: (a) between the hours of 8:00 am to 6:00 pm Monday to Friday; (b) between the hours of 8:00 am to 1:00 pm Saturday; and (c) if continuously, then not exceeding three (3) hours, with a minimum cessation of work of not less than one (1) hour. For the purposes of this condition, 'continuously' includes any period during which there is less than one (1) hour between ceasing and recommencing any of the work.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • SSTOM Environmental Control Map, Orchard Hills, Rev12, dated 12/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026	NT	Highly noise intensive works are permitted by an EPL. According to Noise and Vibration Construction Monitoring Report 5, high impact works that occurred during the reporting period included concrete crushing at Orchard Hills North and road sawing as part of utilities investigations works at St Marys. Attended monitoring was conducted to verify the noise impacts and the results confirmed that the activities were measured below the Highly Noise Affected (HNA) level. Monitoring locations were selected to represent noise levels at the receiver. A summary results of attended noise monitoring conducted by PLM during Aug 2025-Jan 2026 is provided in Appendix A (Attended activity-specific noise monitoring) of the CMR. Concrete crushing commenced at Orchard Hills Station in December 2025 and continued into January 2026. Auditees advised the crushing activity was undertaken with the required 3 hours on and 1 hour off respite. The Orchard Hills Environmental Control Map (ECM) was updated to include the concrete stockpile and crusher, which was communicated to workers. Other small scopes of work have been undertaken such as hammering out concrete washout bays but are understood not to trigger the intent of **Condition E39**.
E40	This approval does not permit blasting.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025	NT	No blasting is known to have been undertaken for the project.
Variation to Work Hours				
E41	Notwithstanding Conditions E38 and E39 work may be undertaken outside the hours specified in the following circumstances: (a) Safety and Emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or (b) Low impact, including: (i) construction that causes LAeq(15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and • no more than the 'Noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land user(s); and (ii) construction that causes: • continuous or impulsive vibration values, measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), or • intermittent vibration values measured at the most affected residence are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of Assessing V bration: a technical guideline (DEC, 2006); or (c) By Approval, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an Out-of-Hours Work Protocol as required by Condition E42; or (iii) negotiated agreements with directly affected residents and sensitive land user(s); or (d) By Prescribed Activity, including: (i) tunnelling and ancillary support activities (excluding cut and cover tunnelling and surface works not directly supporting tunnelling) are permitted 24 hours a day, seven days a week; or (ii) grout batching at the Orchard Hills construction site is permitted 24 hours per day, seven days per week; or (iii) delivery of material that is required to be delivered outside of standard construction hours in Condition E38 to directly support tunnelling activities, except between the hours 10:00 pm and 7:00 am to / from the Orchard Hills ancillary facility; or (iv) haulage of spoil generated through tunnelling is permitted 24 hours per day, seven days per week except between the hours of 10:00 pm and 7:00 am to / from the Orchard Hills construction site; or (v) works within an acoustic enclosure are permitted 24 hours a day, seven days a week where there is no exceedance of noise levels or intermittent v bration levels under Low impact circumstances identified in Condition E41(b), unless otherwise agreed with the Planning Secretary; or (vi) tunnel and underground station box fit out works are permitted 24 hours per day, seven days per week. On becoming aware of the need for emergency work in accordance with (a)(ii) above, the ER, the Planning Secretary and the EPA must be notified of the reasons for such work. The Proponent must use best endeavours to notify as soon as practicable all noise and/or v bration affected sensitive land user(s) of the likely impact and duration of those work. ***Notes:*** *1. Tunnelling does not include station box excavation. 2. Tunnelling ancillary support activities includes logistics support and material handling and delivery.*	• ER Interview, 7/8/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro WSA ER Monthly Report February 2026, dated 6/3/2026 • Sydney Metro WSA ER Monthly Report March 2026, dated 7/4/2026 • Sydney Metro WSA ER Monthly Report April 2026, dated 7/5/2026 • Sydney Metro WSA ER Monthly Report May 2026, dated 5/6/2026 • Sydney Metro WSA ER Monthly Report June 2026, dated 6/7/2026 • Sydney Metro WSA ER Monthly Report July 2026, dated 6/2/2026 • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3 • SM-WSA SSTOM OOHW Permit_092_Stabling and Maintenance Facility Rev02, approved 22/1/2026 • SM-WSA SSTOM OOHW Permit_105 Delivery of train to SMF, north of the M&A building Rev00, approved 26/6/2026 • The Stabling and Maintenance Facility (SMWSASSM-PLD-OHE-SF153-NV-RPT-000003 - SMF OOH DNVIS Rev03) • SM-WSA SSTOM OOHW Permit_088_Stabling and Maintenance Facility – Substation Buildings Rev00, approved 12/12/2025 • E41 – PLM OOHW Register • PLM Noise Monitoring Register, extract February to August 2026 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 • SMF Package for Additional Construction Hours and Extension Community Agreement E1.3 Report Rev02, dated 24/07/2026	C	(a) Condition E68(a) was not triggered during the audit period. (b) (i) Low Impact (NML compliant) works undertaken during the audit period included works to substation buildings at the SMF. These activities are approved via an Out of Hours Works (OOHW) Permit process. The SSTOM OOHW Register was provided for review during the audit and included a proposed calendar of works for the assessment of potential cumulative impacts. According to the Register, OOHW undertaken during the audit period included: • STM Concrete Pour Works (6pm-10pm weekdays, 1pm-6pm Saturday) (14/11/23-31/8/26) • STM Concrete Pour Works Scenario Concrete Pour prior or 7am and post 10pm (14/11/23-31/8/26) • OHE Concrete Pour Works (6pm-10pm weekdays, 1pm-6pm Saturday) (20/6/24-31/8/26) • OHE Concrete Pour Works Scenario Concrete Pour prior or 7am and post 10pm (20/6/24-31/8/26) • BRD Concrete Pour Works Scenario Concrete Pour prior or 7am and post 10pm (3/7/24-31/8/26) • BRD Concrete Pour Works (6pm-10pm weekdays, 1pm-6pm Saturday); Scenario Concrete Pour to 10pm (3/7/24-31/8/26) • BRD Form Work installation and steel reinforcement fixing (3/7/24-31/8/26) • BRDOOH Precast Beam and platforms install (Night) (25/11/24-30/9/26) • CLM Claremont Meadows 24/7 tunnel support activities(19/2/25-31/1/27) • OHE 24/7 tunnel support activities (Night) (2/3/25-20/12/26) • BSF Bringelly Shaft (Night) (10/2/25-31/1/27) • STM 24/7 material cranage/ tunnel activities (Night) (2/5/25-20/12/27) • LDN Precinct Works Low Impact (15/8/25-20/3/27) • SMF Package for additional construction hours and extension (PACE) Comms Agreement (30/1/26-30/10/26) • SMF Building internal fitout (Night) (10/1/26-1/1/27) • BRD 24-7 Material cranage and tunnel support (Night) (2/5/25-21/12/26 OOHW Permit #92 for OOHW at the SMF for Package for Additional Construction and Extension (PACE) was sighted, for works planned from 22/1/2026-30/4/2026. The works covered under the PACE OOHW package include earthworks, track construction, overhead wiring, external building finishes and concreting. Justification for the works to be undertaken OOH is based on the works by agreement conditions noted in EPL 21807 Condition E1 Community Agreements (SMF PACE Community Agreement E1.3 Report Rev00, dated 9/1/2026). The Community Agreements sets out details of the consultation undertaken, results and responses received, and consultation outcomes. Notifications, feedback forms and examples of receiver written responses, and a detailed register of responses are attached as appendices to the Community Agreement. Of the receivers who could be reached, the substantial majority of receivers consented to the extended works. Attended night-time noise monitoring data was reviewed for PACE works at the SMF at nearby sensitive receivers in Orchard Hills on 23/1/2026 & 28/1/2026. PLM work was within or below DNVIS predicted levels. Data is reported six-monthly in the Noise and Vibration Construction Monitoring Report (CMR) to DPHI. The SSTOM Noise and Vibration CMR, August 2025 was made available for review during the audit, and submission to DPHI verified. (Refer also Condition C21). (ii) - Not triggered. (iii) - Not triggered. (c) Two OOHW Permits were sighted for SSTOM OOHW categorised under Condition E41(c): • SM-WSA SSTOM OOHW Permit_092_Stabling and Maintenance Facility Rev02, approved 22/1/2026 • SM-WSA SSTOM OOHW Permit_105 Delivery of train to SMF, north of the M&A building Rev00, approved 26/6/2026 (d) No OOHW permits were issued by prescr bed activity under Condition E41(d) during the audit period. Auditees advised an EPL variation was sought for various prescribed activities, which means any prescribed activities under (d) are assessed under Condition E41(c).

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Out-Of-Hours Work Protocol – Work not subject to an EPL				
E42	An **Out-of-Hours Work Protocol** must be prepared to identify a process for the consideration, management and approval of work (not subject to an EPL) that is outside the hours defined in **Conditions E38** and **E39**. The Protocol must be approved by the Planning Secretary before commencement of the out-of-hours work. The Protocol must be prepared in consultation with the **ER**. The Protocol must provide: (a) justification for why out-of-hours work need to occur; (b) identification of low and high-risk activities and an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: (i) the **ER** reviews all proposed out-of-hours activities and confirms their risk levels; (ii) low risk activities that can be approved by the **ER**; and (iii) high risk activities that are approved by the Planning Secretary; (c) a process for the consideration of out-of-hours work against the relevant NML and vibration criteria; (d) a process for selecting and implementing mitigation measures for residual impacts in consultation with the community at each affected location, including respite periods consistent with the requirements of **Condition E56**. The measures must take into account the predicted noise levels and the likely frequency and duration of the out-of-hours works that sensitive land user(s) would be exposed to, including the number of noise awakening events; (e) procedures to facilitate the coordination of out-of-hours work including those approved by an EPL or undertaken by a third party, to ensure appropriate respite is provided; and (f) notification arrangements for affected receivers for all approved out-of-hours works and notification to the Planning Secretary of approved low risk out-of-hours works. This condition does not apply if the requirements of **Condition E41** are met. ***Note:*** *Out-of-hours work is any work that occurs outside the construction hours identified in* ***Condition E38*** *and* ***E39****.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA Out of Hours Work Protocol v3.0, dated 26/5/2022	C	Reference to the OOHW Protocol is included in the SSTOM CNVMP, but all out of hours works during the audit period were reportedly conducted under the project EPL for PLM. Refer previous audits for details of OOHW Protocol approval and consultation, and verification of Protocol contents in accordance with **Condition E42**.
Construction Noise Management Levels and Vibration Criteria				
E43	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria: (a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009); (b) preferred vibration criteria established using the Assessing v bration: a technical guideline (DEC, 2006) (for human exposure); (c) Australian Standard AS 2187.2 - 2006 "Explosives - Storage and Use - Use of Explosives" (for human exposure); (d) BS 7385 Part 2-1993 "Evaluation and measurement for vibration in buildings Part 2" as they are "applicable to Australian conditions"; and (e) the vibration limits set out in the German Standard DIN 4150-3: Structural V bration- effects of vibration on structures (for structural damage). Any work identified as exceeding the noise management levels and / or vibration criteria must be managed in accordance with the **Noise and Vibration CEMP Sub-plan**. ***Note:*** *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.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • SM-WSA SSTOM OOHW Permit_092_Stabling and Maintenance Facility Rev02, approved 22/1/2026 • SM-WSA SSTOM OOHW Permit_105 Delivery of train to SMF, north of the M&A building Rev00, approved 26/6/2026 • The Stabling and Maintenance Facility (SMWSASSM-PLD-OHE-SF153-NV-RPT-000003 - SMF OOH DNVIS Rev03) • SM-WSA SSTOM OOHW Permit_088_Stabling and Maintenance Facility – Substation Buildings Rev00, approved 12/12/2025 • E41 – PLM OOHW Register • PLM Noise Monitoring Register, extract February to August 2026 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025	C	Noise and vibration standards and guidelines adopted for the Project are listed in Section 6 of the SSTOM NVMP. Section 6.4 of the SSTOM NVMP addresses **Condition E43** and the recommended limits outlined in Section 6.4.1 summarise the recommended limits outlined in DIN 4150 to ensure minimal risk of cosmetic damage to residential and industrial buildings. In accordance with CSSI 10051, a DNVIS is to be prepared for each construction site before construction noise and vibration impacts commence for any work that may exceed the NMLs, v bration criteria and / or ground borne noise levels specified in **Conditions E43** and **E44** at any residence outside construction hours identified in **Condition E38**, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under **Condition E87**. Each DNVIS includes the verification of compliance against each applicable SSI 10051 Condition of Approval, and EPL Conditions and recommends whether the proposed works can be managed to comply with SSI 10051 and the EPL. A sample of OOH Permits was reviewed during the audit: • SM-WSA SSTOM OOHW Permit_092_Stabling and Maintenance Facility Rev02, approved 22/1/2026 • SM-WSA SSTOM OOHW Permit_105 Delivery of train to SMF, north of the M&A building Rev00, approved 26/6/2026 Mitigation measures are included in each OOHW Permit. Auditees advised there were no potentially vibration impacted receivers identified during the audit period.
E44	All reasonable and feas ble mitigation measures must be applied when the following residential ground-borne noise levels are exceeded: (a) evening (6:00 pm to 10:00 pm) — internal LAeq(15 minute): 40 dB(A); and (b) night (10:00 pm to 7:00 am) — internal LAeq(15 minute): 35 dB(A). The mitigation measures must be outlined in the **Noise and Vibration CEMP Sub-plan**, including in any **Out-of-Hours Work Protocol**, required by **Condition E42**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • SSTOM Complaints Register	NT	Ground-borne noise has not been identified as an issue relevant to SSTOM during the audit period. Ground-borne noise criteria is set out in Section 6.2 of the SSTOM NVMP; Potential impacts associated with ground-borne noise are set out in Section 7.2.3 of the SSTOM NVMP. PLM has predicted that ground-borne noise impacts for SSTOM are expected to be negligible and are not anticipated to result in negative community reaction. The application of mitigation measures in Section 9 of the CNVMP for the control of airborne noise emissions and vibration is expected to adequately address ground-borne noise. There were no complaints received related to ground-borne noise during the audit period.
E45	Noise generating work in the vicinity of potentially-affected community, religious, educational institutions and noise and v bration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled within sensitive periods, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • SM-WSA SSTOM DNVIS Concrete Works - OOH Rev03, dated 26/11/2025 • St Marys community notification Utility investigation works, December 2025 • Noise Monitoring Results, St Marys Station Utility Investigation works, dated 19/1/2026	NT	There were no noise generating works in the vicinity of potentially-affected community, religious, educational institutions and noise and v bration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) during the audit period.

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Noise and Vibration Mitigation and Management				
E46	Industry best practice construction methods must be implemented where reasonably practicable to ensure that noise and vibration levels are minimised around sensitive land use(s). Practices may include, but are not limited to: (a) use of regularly serviced low sound power equipment; (b) at source control, temporary noise barriers (including the arrangement of plant and equipment) around noisy equipment and activities such as rock hammering and concrete cutting; (c) use of non-tonal reversing alarms; and (d) use of alternative construction and demolition techniques.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026 • Sound Power Level Checks: • STM Large hydraulic hammer, dated 2/7/2026 • SMF Profile grinder, dated 17/7/2026 • Site inspection, dated 3/8/2026 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 • PLM Work Order Inspection, Excavator, dated 25/2/2026 • PLM Work Order Inspection, Excavator, dated 27/7/2026 • Environment Protection Licence (EPL) 21807	C	Noise mitigation measures as per **Condition E46** are set out in the SSTOM NVMP, and are defined for specific scenarios in DNVIS' and Out of Hours Work (OOHW) Permits. (a) Plant and equipment service records are managed via the MEX system. Sound Power Level measurements were previously reviewed for the tower crane at St Marys (IA2), and recommendations for the application of acoustic shields/shroud implemented. Verification records for noise mitigation from the crane was sighted, dated 2/10/2024 and 4/11/2024. Sound Power Level measurements for a large hydraulic hammer and profile grinder were sighted and an exceedance was not predicted. ***Refer E41(b)(i) for more information.*** (b) At source noise controls were observed during the site inspection. Noise blankets had been placed around generators, and a noise wall had been installed between the site and adjacent residents at the Claremont Meadows service facility (and Bringelly) and St Marys Station. Hoarding was in place around other sites included in the scope of the inspection, including Orchard Hills Station. A row of site containers forms a noise wall along the site boundary adjacent to the concrete batching plant at Orchard Hills. Noise mats were observed during IA installed on a construction fence along the boundary at Bradfield Station. Ventilation fans have been set to run at 80% capacity to reduce noise impacts at Bringelly. An exclusion zone is in place around the WaterNSW pipeline, and around the Goods Shed at ST Marys, to reduce potential vibration impacts to heritage-listed infrastructure. (c) Pre-start checks include a check for reversing alarms (no beepers allowed). (d) Examples of the use of alternative construction and demolition techniques was discussed and included a the use of day makers utilising batteries or solar rather than generators, e.g. Bradfield Station. There was no demolition undertaken during the audit period.
E47	Detailed **Noise and Vibration Impact Statements (DNVIS)** must be prepared for any work that may exceed the NMLs, vibration criteria and / or ground-borne noise levels specified in **Conditions E43 and E44** at any residence outside construction hours identified in **Condition E38**, or where receivers will be highly noise affected or subject to vibration levels above those otherwise determined as appropriate by a suitably qualified structural engineer under **Condition E87**. The **DNVIS** must include specific mitigation measures identified through consultation with affected sensitive land user(s) and the mitigation measures must be implemented for the duration of the works. A copy of the **DNVIS** must be provided to the **ER** before the commencement of the associated works. The Planning Secretary and the EPA may request a copy (ies) of the **DNVIS**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 Aug 2025-Jan 2026 Rev00, dated 8/5/2026 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 • Environment Protection Licence (EPL) 21807 • Linewide North Extended Hours Community Agreement E1.3 Report Rev03, dated 25/11/2025 • Linewide South Extended Hours Community Agreement E1.3 Report Rev02, dated 15/7/2025 • SMF Package for Additional Construction Hours and Extension Community Agreement E1.3 Report Rev02, dated 24/07/2026	C	DNVIS' have been prepared for each project site (and for specific activities) for SSTOM and were available on the project website. There were no new DNVIS' prepared or assessed during the IA6 audit period. There were two DNVIS' provided for review during the IA5 audit period and assessed out of hours work (OOHW) for the following activities and locations: • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 A Land Use Survey was prepared for each assessment and forms Appendix B to each corresponding DNVIS. The purpose of the DNVIS is to identify receivers with predicted levels above Noise Management Levels (NMLs) requiring Additional Mitigation Measures (AMMs), which are documented in Section 7.2 of each DNVIS. Sensitive receiver information in the DNVIS is captured from the attached Land Use Survey. The closest sensitive receiver to the Bringelly Shaft Site Works OOHW (DNVIS, Dec 2025) is identified in Section 3.2 as "*residential receivers spanning from the south-west to the south-east of the Project Site, with the worst noise-affected receiver being 38 Derwent Road, approximately 80m directly south of the Project Site.*" The closest sensitive receivers to the SMF Site Works OOHW (DNVIS, Dec 2025) are identified in Section 3.2 as "*residences located approximately 250m from work areas. These include: A group of residences to the west along Bordeaux Place, Orchard Hills; & A small number of residences, scattered to the east and southeast, accessed via Luddenham Road.*" A Community Agreement is in place specific to the PACE scope of works at the SMF and applies to residents of The Vines and St Clair and involves a one hour earlier start M-F (6am) and & 7am-6pm on Sat. Mitigation measures in each DNVIS, Section 7.1 note that "*consultation with affected receivers as per CCS will be ongoing*". The DNVIS' were provided to the ER for review and the subject works are not permitted to commence until the DNVIS has been finalised. Implementation of the specific mitigation measures is verified by the PLM Environment Manager, and the ER during construction, as evidenced in ER inspection reports. PLM advised they are conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works. Community Agreements previously in place for Linewide (north and south) are no longer relevant due to the completion of the OOHW scope in these areas. The SMF PACE Community Agreement is the only community agreement remaining in place for the project.
E48	Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before works that generate vibration commences in the vicinity of those properties. If the potential exceedance is to occur more than once or extend over a period of 24 hours, owners and occupiers must be provided a schedule of potential exceedances on a monthly basis for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Noise and Vibration CEMP Sub-plan.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 July 2025-Jan 2026 Rev00, dated 8/5/2026 • Sydney Metro WSA ER Monthly Report February 2026, dated 6/3/2026 • Sydney Metro WSA ER Monthly Report March 2026, dated 7/4/2026 • Sydney Metro WSA ER Monthly Report April 2026, dated 7/5/2026 • Sydney Metro WSA ER Monthly Report May 2026, dated 5/6/2026 • Sydney Metro WSA ER Monthly Report June 2026, dated 6/7/2026 • VMS Australia Unattended Vibration Monitoring Report 01, Warragamba Pipeline, Orchard Hills NSW 2748, 9/4/25-11-4/25, dated 16/4/2025	NT	Vibration monitoring results are summarised in ER Monthly Reports and Construction Monitoring Reports. There were no vibratory activities with the potential to affect buildings, structures or receivers identified during the audit period. Vibration monitoring for due diligence purposes was undertaken on Linewide Portion 1 to demonstrate no impact to the Warragamba pipeline. No vibratory exceedances were identified. The requirement to identify properties at risk of cosmetic damage is addressed in Section 6.4 of the SSTOM NVMP. Vibration screening criteria for cosmetic damage is listed in Table 17 of the SSTOM NVMP. The list of potentially affected residents for any particular scope is included in the DNVIS and/or OOHW Permit, rather than in the NVMP. It is understood that notification to properties at risk of exceeding v bration screening criteria would generally be captured in the notification process for noisy works. The Goods Shed at St Marys is expected to trigger the requirement for v bration monitoring later in the project. No SSTOM works have been undertaken within the minimum working distance of the Goods Shed to date. This is expected to be triggered once the St Marys precinct works commence. Section 6.4.3 of the SSTOM NVMP sets out the requirements for work near v bration sensitive structures, including heritage-listed structures. The EIS (Technical Paper 2) identified heritage receivers relevant to noise and vibration impacts associated with SSTOM Works which are summarised in in Table 25 of the SSTOM NVMP and include: St Marys Railway Station Group, Queen Street St Marys Post-War Commercial Building, St Marys Munitions Workers Housing, Four Winds - Dwelling & Brick House (Claremont Meadows), Warragamba to Prospect Water Supply Pipelines and McGarvie-Smith Farm (off-airport corridor).

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
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. ***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.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 July 2025-Jan 2026 Rev00, dated 8/5/2026	NT	There have been no sensitive land use(s) identified for SSTOM exceeding the highly noise affected criteria during typical case construction during the audit period. The St Marys Station site has the closest residents to the project site and construction activities, but **Condition E49** has not been triggered to date for SSTOM. There is one sensitive receiver located adjacent to Linewide Portion 1 (resident) that is l kely to trigger **Condition E49** during future track construction out of hours works.
E50	For all construction sites where acoustic sheds are installed, the sheds must be designed, constructed and operated to minimise noise emissions. This would include the following considerations: (a) all significant noise producing equipment that would be used during the night-time would be inside the sheds, where feas ble and reasonable; (b) noise generating ventilation systems such as compressors, scrubbers, etc, would be located inside the sheds and external air intake/discharge ports would be appropriately acoustically treated; and (c) the doors of acoustic sheds would be kept closed during the night-time period. Where night-time vehicle access is required at sites with nearby residences, the shed entrances would be designed and constructed to minimise noise breakout.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025	NT	There are no acoustic sheds on SSTOM.
E51	Where **Condition E49** determines that at-property treatment (temporary or permanent) is the appropriate measure to reduce noise impacts, this at-property treatment must be offered to landowners of residential properties for habitable living spaces, unless other mitigation or management measures are agreed to by the landowner. Landowners must be advised of the range of options that can be installed at or in their property and given a choice as to which of these they agree to have installed. A copy of all guidelines and procedures that will be used to determine at-property treatment at their residence must be provided to the landowner.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025	NT	**Condition E51** has not been triggered to date for SSTOM.
E52	Any offer for at-property treatment or the application of other noise mitigation measures in accordance with **Condition E51**, does not expire until the noise impacts specified in **Condition E49**, affecting that property are completed, even if the landowner initially refuses the offer. ***Note****: If an offer has been made but is not accepted, this does not preclude the commencement of construction under* ***Condition E49****.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to **Condition E52** to date for SSTOM.
E53	The implementation of at-property treatment does not preclude the application of other noise and vibration mitigation and management measures including temporary and long term accommodation.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025	NT	There has been no application of at-property treatment or other noise mitigation measures applicable to **Condition E53** to date for SSTOM.
Construction Vibration Mitigation - Heritage Items				
E54	V bration testing must be conducted during v bration 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 v bration are likely to be exceeded, the Proponent must review the construction methodology and, if necessary, implement additional mitigation measures. Such measures must include, but not be limited to, review or modification of excavation techniques.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026	NT	There has been no vibration monitoring conducted for SSTOM to date and no v bration generating activities identified within minimum working distances with the potential to impact on heritage items. Refer pipeline vibration monitoring, **Condition E48**.
E55	The Proponent must seek the advice of a heritage specialist on methods and locations for installing equipment used for vibration, movement and noise monitoring at Heritage items.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025 • Sydney Metro WSA - SSTOM - Noise and Vibration Construction Monitoring Report 5 July 2025-Jan 2026 Rev00, dated 8/5/2026	NT	Vibration monitoring equipment was installed on the Goods Shed by SBT prior to their works commencing, and has remained in place during the SSTOM project. Pipeline vibration monitor was not attached to the heritage item. **NB:** *SSTOM will seek advice as to whether* ***Condition E55*** *needs to be re-verified prior to the commencement of vibratory activities within minimum working distance of the St Marys Goods Shed.*

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Utility Coordination and Respite				
E56	All work undertaken for the delivery of the CSSI, including those undertaken by third parties (such as utility relocations), must be coordinated to ensure respite periods are provided. The Proponent must: (a) reschedule any work to provide respite to impacted noise sensitive land use(s) so that the respite is achieved in accordance with **Condition E57**; or (b) consider the provision of alternative respite or mitigation to impacted noise sensitive land use(s); and (c) provide documentary evidence to the ER in support of any decision made by the Proponent in relation to respite or mitigation. The consideration of respite must also include all other approved Critical SSI, SSI and SSD projects which may cause cumulative and / or consecutive impacts at receivers affected by the delivery of the CSSI.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 •SSTOM NVMP, Rev 04, 13/11/2025 • Environmental Review - ER007 Bringelly Power Utility Installation Rev 2.0, dated 7/8/2025 • Environmental Review - ER008 St Marys Station Utility Works Rev 2.0, dated 15/10/2025 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025 • SM-WSA Cumulative Impact Meeting Minutes #024 18/2/2026 • SM-WSA Cumulative Impact Meeting Minutes #025 18/3/2026 • SM-WSA Cumulative Impact Meeting Minutes #026 15/4/2026 • SM-WSA Cumulative Impact Meeting Minutes #027 20/5/2026 • SM-WSA Cumulative Impact Meeting Minutes #028 17/6/2026 • SM-WSA Cumulative Impact Meeting Minutes #029 15/7/2026	C	Third party works relevant to **Condition E56** are managed as per the DNVIS and OOHW procedures. The process for coordination and respite is defined in the CNVMP. Environmental Reviews have been prepared for utility works on Kent Street & Samuel Marsden Roads, Orchard Hills. These works had not commenced at the time of the audit (IA6), but are expected to be included in future OOHW Permits and have been assessed in a specific DNVIS (Orchard Hills Utilities Rev00, dated 30/4/2024). PLM plan to undertake future works in the St Marys precinct that is likely to trigger utility coordination and respite provisions under **Condition E56**. Utility works involving the installation and/or relocation of third party utilities was undertaken by SSTOM during the IA5 audit period. An Environmental Review was prepared for Bringelly Power Utility Installation in August 2025. The works were undertaken along Derwent Road under a DNVIS and completed by Endeavour Energy. The works were completed within one Sunday shift and noise modelling was incorporated into the PLM OOHW Permit. St Marys utility investigation works conducted were approved under an Environmental Review in October 2025. The works undertaken to date at the time of IA5 were by PLM contractors, but further works by third parties will be required in the future. PLM advised CSR works were ongoing in the SMF during standard working hours only within the project boundary. Potential remains for cumulative impacts from SSTOM with other nearby project sites. Cumulative impact assessments are undertaken by PLM during OOH works planning. Refer to noise conditions for more information. It is noted that a decrease in the number of complaints received by the project aligns with a reduction in the amount of out of hours work being undertaken. For example, at St Mary's Station, out of hours work for beam delivery concrete pours have not been utilised as frequently during the audit period and works associated with the neighbouring SM-WSA Footbridge St Marys (FSM) project site have also decreased. Cumulative impacts from interfaces and other nearby construction sites have historically been managed through monthly Cumulative Impact Meetings. Sydney Metro undertakes periodic meetings with surrounding projects, including Bradfield Delivery Authority (BDA) and the FAW_FSM project at St Marys. BDA meetings are attended by PLM, Sydney Metro, and WEM Civil (the BDA Principal Contractor) during which cumulative impacts are discussed. Outcomes of both meetings are referenced and discussed as appropriate within fortnightly formal Environmental Working Group minutes or in informal discussions with PLM. Monthly PLM delivery interface (Cumulative Impact) meetings are minuted and include attendees from Sydney Metro, SSTOM and FAW_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. Traffic and access impacts reduced with the completion of SCAW and SBT import and tunnelling works, which resulted in significant improvements to surface water quality, dust emissions, and noise and v bration impacts. Auditees described the process of Contractors discussing their scope of works at each station daily to determine the potential for cumulative impacts and mitigation. Informal discussions about the minimisation of cumulative impacts also occurs between Principal Contractors and Sydney Metro Environment Managers as part of their day-to-day roles. There were no significant issues with cumulative impacts noted for discussion during the audit or observed on site, though it is noted this is an ongoing focus for the project, particularly with utility works scheduled to commence in the St Marys precinct in mid-late 2026.
Out-of-Hours Works – Community Consultation on Respite				
E57	In order to undertake out-of-hours work outside the work hours specified under **Condition E38**, appropriate respite periods for the out-of-hours work must be identified in consultation with the community at each affected location on a regular basis. This consultation must include (but not be limited to) providing the community with: (a) a progressive schedule for periods no less than three (3) months, of likely out-of-hours work; (b) a description of the potential work, location and duration of the out-of-hours work; (c) the noise characteristics and l kely noise levels of the work; and (d) likely mitigation and management measures which aim to achieve the relevant NMLs under **Condition E43** (including the circumstances of when respite or relocation offers will be available and details about how the affected community can access these offers). The outcomes of the community consultation, the identified respite periods and the scheduling of the likely out-of-hour work must be provided to the **ER** before the out of hours work commences, and to the EPA and the Planning Secretary on request. ***Note:*** *Respite periods can be any combination of days or hours where out-of-hours work would not be more than 5 dB(A) above the RBL at any residence.*	• ER Interview, 7/8/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro WSA Modification of Infrastructure Approval (SSI-10051 MOD 2), determined 20 December 2024 • PLM SSTOM - SMF - E57 St Marys Station Consultation Report, Rev13, dated 19/6/2026 • PLM OHW - E57 Orchard Hills Station Consultation Report, Rev07, dated 19/6/2026 • PLM OHW - E57 Claremont Meadows Service Facility Consultation Report, Rev07, dated 20/7/2026 • PLM OHW - E57 Linewide Surface Works Consultation Report, Rev05, dated 28/5/2026 • PLM SSTOM - E57 Bradfield Metro Station Consultation Report, Rev02, dated 18/12/2024 • PLM SSTOM - E57 Bringelly Services Facility Consultation Report, Rev04, dated 16/1/2026 • PLM SSTOM - E57 The Stabling and Maintenance Facility Consultation Report, Rev08, dated 18/12/2025 • PLM SSTOM - E57 Bradfield Metro Station Consultation Report, Rev06, dated 18/12/2025 • SM-WSA SSTOM DNVIS Bringelly Shaft Site Works - OOH Rev01, dated 22/12/2025 • SM-WSA SSTOM DNVIS SMF Site Works - OOH Rev03, 9/12/2025	C	The application of Condition E57 for SSTOM is usually via a case by case assessment for RO and AA offers for sensitive receivers. The Sydney Metro SSTOM Communications Manager was interviewed during a previous audit and outlined the consultation process for OOHW, which remained the same during IA6. E57 Consultation Reports were reviewed for the St Marys Station, Orchard Hills Station, Claremont Meadows Service Facility and Linewide Surface Works. Out of hours work at St Marys Station includes: Extended work hours for OSOM deliveries; Ongoing extended hours for concrete works and supporting formwork; and Tunnel and underground station box fitout. Out of hours work at Orchard Hills Station includes: Ongoing oversized plant and equipment deliveries; Tunnel and Underground Station Box Fit Out; Utility investigation and installation works. Out of hours work at Claremont Meadows Service Facility includes: Tunnel fit out works and surface support activities 24 hours a day, seven days a week. Out of hours work for Linewide Surface Works includes: Deliveries of oversize plant and equipment. E57 Consultation Reports provide a summary of consultation undertaken in accordance with Condition E57 with respect to out of hours works activities at each site, and include at least a 3-month lookahead for proposed activities at each site. Maps of the distr bution area are also included in the Consultation Reports. Community Notifications are uploaded to the Sydney Metro website and were current at the time of the audit. Where impacted properties have not been able to be reached by door-knocking, 'SWMY' slips are left at the property that include contact details to get in touch. E57 Consultation Reports were available on the PLM project website and provided to the ER as required. PLM is conducting ongoing coordination with other contractors to ensure that respite periods are maintained throughout the works. MOD 2 was determined on 20/12/2024 and amends Condition E13 to decouple tree replacement from the Place, Urban Design and Corridor Landscape Plan (PUDCLP) and Condition E57 so that information on consultation, respite and out of hours work information be provided to the EPA and Planning Secretary on request.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Noise Mitigation - Operational Noise and Vibration Mitigation Measures				
E58	The Proponent must prepare an Operational Noise and V bration Review (**ONVR**) to confirm noise and vibration mitigation measures that would be implemented for the Operation of the CSSI for the ultimate service. The **ONVR** must be prepared as part of the iterative design development and in consultation with the EPA, relevant council(s), other relevant stakeholders and must: (a) identify appropriate Operational noise and vibration objectives and levels for surrounding development, including existing and potential future (as known at the time of ONVR preparation) sensitive land use(s); (b) confirm the operational noise and vibration predictions based on the expected final design. Confirmation must be based on an appropriately cal brated 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 V bration: 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 V bration: 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 v bration complaints management, including investigation and monitoring (subject to complainant agreement). The **ONVR** must be verified by an independent acoustic expert and submitted to the Planning Secretary for approval before the implementation of any operational noise mitigation measures. The Proponent must implement the identified noise and vibration control measures and make the **ONVR** publicly available. ***Note**: The design of noise barriers and the like must be undertaken in consultation with the relevant stakeholders, including affected landowners and businesses (or a representative of a business), Western Parklands City Authority and relevant council(s) as part of the **Place, Urban Design and Corridor Landscape Plan** required under **Condition E79**.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • PLM Operational Noise and Vibration Report (ONVR) for Public Use Rev02, dated 10/3/2026 • PLM Operational Noise and Vibration Report (ONVR), Stakeholder Consultation Memo Rev00, dated 27/5/2026 • DPHI Letter to Sydney Metro RE: Western Sydney Airport – Operational Noise and Vibration Review for Public Use (ONVR), dated 10/7/2026	C	The Operational Noise and Vibration Report (ONVR) was prepared and finalised in consultation with NSW EPA & councils. The ONVR was submitted to DPHI for review on 12/6/2026 and was approved by DPHI in a letter dated 10/7/2026, confirming the ONVR: • Has been prepared in consultation with external stakeholders • Provides suitable objectives and levels for surrounding development • Details operational noise and vibration predictions based on the expected final design • Identifies sensitive land uses • Identifies mitigation measures • Includes a consultation strategy to seek feedback including complaints management • Has been verified by an independent acoustic expert The ONVR was verified by an independent acoustic expert - Renzo Tonin, and a statement is attached to the ONVR as Appendix K, dated 30/10/2024. A summary of the consultation undertaken with the EPA, relevant council(s), other relevant stakeholders is included in the report. **Observation 2**: ***The Renzo Tonin Independent Verification Certificate, Appendix K of the ONVR, is dated 30/10/2024, almost 2 years prior to the ONVR being prepared on 10/3/2026.*** **Recommendation**: ***The Proponent should consider updating the Renzo Tonin Independent Verification Certificate, Appendix K of the ONVR, dated 30/10/2024 to ensure the verification relates to the latest version of the ONVR.***
E59	Operational noise mitigation measures as identified in **Condition E58** that will not be physically affected by work, must be implemented within six months of submitting the ONVR, unless otherwise agreed by the Planning Secretary. Where implementation of operational noise mitigation measures are not proposed to be implemented in accordance with this requirement, the Proponent must submit to the Planning Secretary a report providing justification as to why, along with details of temporary measures that would be implemented to reduce construction noise impacts, until such time that the operational noise mitigation measures are implemented.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • DPHI Letter to Sydney Metro RE: Western Sydney Airport – Operational Noise and Vibration Review for Public Use (ONVR), dated 10/7/2026	NT	The ONVR has not recommended any operational noise mitigation.

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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E60	Within 12 months of the commencement of operation of the CSSI, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the CSSI against the noise performance predicted in the review of noise mitigation measures required by **Condition E58**. An **Operational Noise and Vibration Compliance Report (ONVCR)** must be prepared to document this monitoring and include, but not necessarily be limited to: (a) noise and vibration monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under **Condition E58**; (b) methodology, location and frequency of noise and v bration monitoring undertaken, including monitoring sites at which CSSI noise and vibration levels are ascertained, with specific reference to locations indicative of impacts on receivers; (c) a review of the performance of the CSSI against the: (i) operational noise levels in terms of criteria and noise goals established in the *NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry* (EPA, 2017); (ii) vibration goals for human exposure for existing sensitive land use(s), as presented in Assessing V bration: a Technical Guideline (DECC, 2006); (d) details of any complaints and enquiries received in relation to Operational noise and vibration generated by the CSSI (between the date of commencement of Operation and the date the report was prepared); (e) an assessment of the performance and effectiveness of applied noise and vibration mitigation measures together with a review and if necessary, reassessment of mitigation measures; (f) identification of: (i) additional measures to meet the criteria outlined in the NSW Rail Infrastructure Noise Guideline (EPA 2013) and Noise Policy for Industry (EPA, 2017), (ii) additional measures to meet the vibration goals for human exposure for existing sensitive land, as presented in Assessing Vibration: a Technical Guideline (DECC, 2006); (iii) when these measures are to be implemented; and (iv) how their effectiveness is to be measured and reported to the Planning Secretary and the EPA. The **ONVCR** must be submitted to the Planning Secretary and the EPA within 60 days of completing the Operational noise and vibration monitoring and made publicly available. ***Note:*** *Refer to* ***Condition B5*** *about how personal information will be handled.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	Not triggered during the audit period.
PLACE, URBAN DESIGN AND VISUAL AMENITY				
Construction Sites				
E61	Wayfinding information must be incorporated on temporary hoardings to guide pedestrians around the St Marys construction site and enhance their understanding and experience of the locality and space.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection 9/02/2026 • St Marys wayfinding signage, sighted 11/8/2025	C	Wayfinding signage was installed on the hoarding around the St Marys station site, as observed during the site inspection.
E62	The CSSI must be constructed in a manner that minimises visual impacts of construction sites including temporary landscaping and vegetative screening, minimising light spill, and incorporating architectural treatment and finishes within key elements of temporary structures that reflect the context within which the construction sites are located, wherever practicable.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection 3/8/2026 • SSTOM Complaints Register February-July 2026	C	Visual mitigation measures observed to be installed during the audit site inspection included: Hoarding or shadecloth around project sites; Containers and noise walls at other locations along site boundaries with sensitive receivers, e.g. Bringelly. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There were no complaints received re visual impact during the IA6 audit period.
Design Requirements and Strategic Context				
E63	The CSSI must be designed with consideration of: (a) the design objectives, principles and guidelines identified in documents listed in **Condition A1**; (b) the principles and objectives of the draft Connecting with Country Framework; (c) relevant land use changes, masterplans and initiatives, where this information is known and/or available; (d) existing and proposed future local context and character; and (e) transport and land use integration and system functionality in the context of precincts, to the extent it is known and/or defined. Responses to items (a) – (e) must be reviewed by the **Design Review Panel (DRP)** to inform the design of permanent built works and landscape design of the CSSI. The outcome of the **DRP** review must be provided to the Planning Secretary prior to the submission of the **Place, Urban Design and Corridor Landscape Plan (PUDCLP)**. ***Note:*** *In accordance with Condition A10 and Condition A16, the requirements of this condition can be staged.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 • SMWSA SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, 23/11/24 • SMWSA SSTOM – Stage 2 PUDCLP – E63 Compliance Statement, 26/11/24 • GANSW DRP Response Condition E63 - SMWSA SSTOM - Stage 3 PUDCLP - E63 Compliance Statement, dated 26/11/2024 • DPHI Submission (PA-526) - E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 29/11/2024 • DPHI Receipt of E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 19/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2 has been prepared to address the requirements of **Condition E63**. SSTOM – Stage 2 PUDCLP – **E63** Compliance Statement, 23/11/24 was provided as evidence and outlines compliance with **Condition E63**, as verified by Parklife Metro. The memo was submitted to the Planning Secretary for information prior to lodgement of the SSTOM PUDCLP: a) The D&C Contractor's design objectives, principles and guidelines have been documented within our Architectural Design Strategy (SMWSASSM-PLD SWD-SW000-AT-RPT-030000), implemented within the developed design and align with the intent of the EIS and Submissions Report. b)The D&C Contractor's response to the draft Connecting with Country Framework is documented within our Architectural Design Strategy (SMWSASSM-PLD-SWD-SW000-AT RPT-030000). In addition to establishing the Linewide response to the Connecting with Country Framework, each of the station designs is supported by a "Station Design Response" which articulates how the overall framework has been applied at each specific site. The Connecting with Country framework has been a foundation of our design development since the earliest stage of the Tender. c) Where known, land use and master plans have been considered in design development. d) Existing conditions and future planning outcomes (where known) were considered in the design development. e) Transport and land use integration and system functionality (where defined) has been suitably considered in the design development. As per PLM's SSTOM contract, DRP consultation began in January 2023 on a bi-weekly basis in order to ensure that design excellence is being achieved.

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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Design Guidance and Standards - Lighting and Security				
E64	The CSSI must be constructed and operated with the objective of minimising light spill to surrounding properties. All lighting associated with the CSSI must be consistent with the requirements of: (a) *ASINZS 4282:2019 Control of the obtrusive effects of outdoor lighting, relevant Australian Standards in the series ASINZS 1158 - Lighting for Roads and Public Spaces;* (b) *NASF Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports;* and (c) *NASF Guideline C: Managing the risk of wildlife strikes in the vicinity of airports.* Mitigation measures must be provided to manage residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Inspection Reports • SSTOM Complaints Register February-July 2026 • Sydney Metro WSA SSTOM CEMP, Rev 03 19/12/2025 • OOHW Permits	C	The OOHW approval process includes an assessment of controls to be applied to minimise light spill during construction. Mitigation measures to manage any residual night lighting impacts to protect properties adjoining or adjacent to the CSSI, in consultation with affected landowners are included in the approval process during night works. Auditees advised visual mitigation measures were implemented during night works such as ensuring lights are directed away from receivers. There were no complaints received re visual impact during the IA6 audit period.
Design Guidance and Standards - Active Transport				
E65	Designs must have regard to the Movement and Place Framework relevant guidance including the *Walking Space Guide: Towards Pedestrian Comfort and Safety* (TfNSW, 2020) and the *Cycleway Design Toolbox: Designing for Cycling and Micromobility* (TfNSW, 2020).	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM Complaints Register February-July 2026 • Sydney Metro WSA SSTOM CEMP, Rev 03 19/12/2025 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 • SMWSA SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, 23/11/24 • SMWSA SSTOM – Stage 2 PUDCLP – E63 Compliance Statement, 26/11/24 • GANSW DRP Response Condition E63 - SMWSA SSTOM - Stage 3 PUDCLP - E63 Compliance Statement, dated 26/11/2024 • DPHI Submission (PA-526) - E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 29/11/2024 • DPHI Receipt of E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 19/12/2024	C	Design of the ATC was finalised with issue of the PUDCLP Stage 2. The PUDCLP Stage 2, Section 2 refers to design objectives and standards and section 6 provides an explanation of how the requirements of **Condition E65** have been met.
E66	Active transport facilities must be designed, constructed and/or rectified in accordance with the Guide to Road Design Part 6A: Paths for Wa king and Cycling (Austroads, 2017) and relevant Australian Standards (AS) such as 1428.1-2009 Design for access and mobility. The active transport links must also incorporate relevant Crime Prevention Through Environmental Design principles.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM Complaints Register February-July 2026 • Sydney Metro WSA SSTOM CEMP, Rev 03 19/12/2025 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 • SMWSA SSTOM – Stage 1 PUDCLP – E63 Compliance Statement, 23/11/24 • SMWSA SSTOM – Stage 2 PUDCLP – E63 Compliance Statement, 26/11/24 • GANSW DRP Response Condition E63 - SMWSA SSTOM - Stage 3 PUDCLP - E63 Compliance Statement, dated 26/11/2024 • DPHI Submission (PA-526) - E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 29/11/2024 • DPHI Receipt of E63 (SSTOM PUDCLP Stage 2 Compliance Statement and DRP Review), dated 19/12/2024	NT	The PUDCLP Stage 2, Section 2 refers to Active transport design guidance and standards; Sections 5-7 refer to the design guides and standards required by **Condition E66** being incorporated into the design. Crime Prevention Through Environmental Design (CPTED) principles are addressed in the PUDCLP Stage 1: Luddenham Station building & Stabling and Maintenance Facility. It is noted that further information for other stations and the Linewide works will be available in the future Stage 2 SSTOM PUDCLP. The PUDCLP Stage 1, Section 2.5.2 - Community safety and privacy, provides details of the CPTED principles which have been applied to each station and includes consideration of: Direct sightlines; Mitigation of concealed spaces; CCTV; Precinct activation; and Lighting design and customer assistance. The PUDCLP Stage 1 notes CPTED compliance will also be further considered in landscape design packages. The PUCLP Stage 2 states "*The requirements of the Guide to Road Design Part 6A and the relevant Australian Standards have been integrated into the design of the active transport facilities at Stations. The Interchange Access Plans (IAP) in Appendix E provide further detail on the transport requirements and principles that are applied to the station precincts*".
Design Review Panel and Design Review				
Panel Membership				
E67	The Proponent must establish an independent **DRP** to provide advice and recommendations to the Proponent during the CSSI's design development and construction to facilitate quality design and place outcomes. The **DRP** must be formed and hold its first meeting within six months of the date of this approval, or as otherwise agreed with the Planning Secretary. ***Note:*** *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.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The Sydney Metro Design Review Panel (DRP) Terms of Reference, Western Sydney Airport Line were sighted and available on the project website. The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month. Participants are set out in Section 3 and include the DRP Chair and panel, including Panel Advisor, Coordinator and SM Project Advisor. Special advisors and external stakeholders may be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest. The DRP has not been meeting frequently during the audit period as there has been no change in design. Meetings are scheduled on an as-needs basis. There was one meeting held during the IA6 audit period, dated 23/4/2026. The DRP met at Horsley Park to view design prototypes.
E68	The respons bilities of the Design Review Panel include: (a) providing advice and recommendations to the Proponent for consideration in the design development of the CSSI (b) provide advice on the application of Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines to key design elements in relation to place making, architecture, heritage, urban and landscape design and artistic aspects of the CSSI; and (c) reviewing and endorsing any updates to the Sydney Metro – Western Sydney Airport Submissions Report – Appendix D Design Guidelines. The Panel's advice must be consistent with the CSSI as approved.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The roles and respons bilities of the DRP are set out in Section 3 of the Terms of Reference and align with **Condition E68**.

Item	
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Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E69	The **DRP** must be chaired by the NSW Government Architect (or their nominee), and must be comprised of, where relevant, by suitably qualified, experienced and independent professional(s) in each of the fields of: (a) urban design and place making; (b) landscape architecture; and (c) architecture. The Panel may seek advice from suitably qualified, experienced independent professionals in other fields as required, including but not limited to sustainability, active transport and non-Aboriginal heritage. The Panel must also seek appropriate expertise to ensure Aboriginal cultural heritage and cultural values inform its advice.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The role of the DRP Chair is set out in Section 3.1 of the DRP Terms of Reference and states DRP meetings are chaired by the NSW Government Architect or their nominee. In the event of their absence, the Chair may nominate an Alternative Chair from the regular Panel members.
E70	Panel members must be sourced from the NSW State Design Review Panel Pool or otherwise be approved by the NSW Government Architect.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The responsibilities of Panel Members are set out in Section 3.2 of the DRP Terms of Reference.
Operation of the Design Review Process				
E71	Prior to forming the **DRP**, a **Design Review Panel Terms of Reference** is to be developed and endorsed by the NSW Government Architect. The **Terms of Reference** must be submitted to the Planning Secretary once it is endorsed by the NSW Government Architect and: (a) must be generally consistent with the NSW State Design Review Panel Terms of Reference (version 5); (b) outline the frequency of **DRP** meetings, coordinated with the Proponent's program requirements, as outlined in **Condition E76**, to ensure timely advice and design adjustment; and (c) identify cessation arrangements.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Sydney Metro Design Review Panel Terms of Reference, Western Sydney Airport Line, 17/1/2024	C	The SM-WSA DRP Terms of Reference has been prepared and is available on the project website. The DRP Terms of Reference (Western Sydney Airport line and Metro West) was endorsed by the Government Architect NSW on 4/3/2022. The DRP Terms of Reference was submitted to DPHI for information. The Terms of Reference addresses each part of **Condition E71** as follows: a) Section 3.2 of the DRP Terms of Reference commits to consistency with the NSW State Design Review Panel Terms of Reference b) The Terms of Reference set out the process for panel operation, with meeting frequency up to twice per month c) Cessation arrangements are set out in Section 5.
E72	The **DRP** must be operated and managed in accordance with the **Design Review Panel Terms of Reference**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026	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. The DRP has not been meeting frequently during the audit period as there has been no change in design. Meetings are scheduled on an as-needs basis. There was one meeting held during the IA6 audit period, dated 23/4/2026. The DRP met at Horsley Park to view design prototypes.
E74	The relevant council may be invited to the meetings of the Panel as observers or to provide feedback on key design elements of the CSSI.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026	C	Section 3 of the DRP Terms of reference sets out the procedure for special advisors and external stakeholders to be invited periodically to participate in DRP meetings to advise on local issues and design outcomes as they relate to matters of interest.
E75	**DRP** advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation must be included when submitting the final **PUDCLP** to the Planning Secretary for information.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with **Condition E75**, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. A record of advice and recommendations register was available for review in Appendix C of the Stage 1 PUDCLP to satisfy **Condition E75**.
E76	The Proponent must provide the design development schedule to the **DRP** prior to its first meeting, including details of when relevant elements of the detailed design will be available for review by the Panel. The schedule must be updated every three months until the detailed design process is complete.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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	A package of slides was presented to the DRP on 1/2/2024 (DRP #36) providing the DRP with a future Design Development Schedule as required under **Condition E76**. A copy of the agenda was also provided for review. ***NB:*** *The requirement for the Design Development Schedule to be provided to the DRP prior to its first meeting was not verified during this audit (outside the audit period and scope), but should be verified by the Proponent to ensure compliance with* ***Condition E76.***

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Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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	A **PUDCLP** must be prepared to document and illustrate the permanent built works and landscape design of the CSSI and how these works are to be maintained. The **PUDCLP** must be: (a) prepared by a suitably qualified and experienced person(s) in consultation with the community (including the affected landowners and businesses or a representative of the businesses), Western Parklands City Authority, Western Sydney Planning Partnership and relevant council(s); (b) reviewed by an independent and suitably qualified and experienced person nominated by the DRP; (c) submitted to the Planning Secretary prior to the construction of permanent built surface works and/or landscaping, excluding those elements which for ecological requirements, or technical requirements, or requirements as agreed by the Planning Secretary do not allow for alternate design outcomes; and (d) implemented during construction and operation of the CSSI. ***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.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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 • GANSW Sydney Metro - Line Western Sydney Airport Design Review Panel 49, dated 23/4/2026 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with **Condition E75**, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit. b) GANSW Principal Design Advisor Melizza Morales was appointed and reviewed the PUDCLP, as documented in GANSW Letter of Advice, Sydney Metro WSA, DRP 24, 21/8/2023.
Place, Urban Design and Corridor Landscape Plan - Documentation				
E78	The **PUDCLP** must document how the following matters have been considered in the design and landscaping of the project: (a) the requirements of **Conditions E63** to **E65**, and (b) advice and recommendations from the **DRP**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with **Condition E75**, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit. A summary of the dates of the DRP meetings and the issues raised by the DRP at these meetings is contained in Section 01 and Appendix C of the PUDCLP Stage 1.
E79	The PUDCLP must include descriptions and visualisations (as appropriate) of: (a) design of the permanent built elements of the CSSI, including stabling and maintenance and ancillary facilities, service facilities and tunnel portals; (b) plans for station precincts including but not limited to (i) justification of the spatial scope of each station precinct plan; (ii) provision for public art and heritage interpretation installations; (iii) placemaking opportunities, having regard to placemaking initiatives in Western Sydney Aerotropolis planning documents; (iv) interchange access plans developed in consultation with the **Traffic and Transport Liaison Group**; (v) active transport connections and end of trip facilities, design of pedestrian and cycle access, facilities and fixtures; (vi) design of commuter car parking elements, where relevant; (c) landscaping and building design opportunities to mitigate visual impacts and minimise light spill on the nearby residences; (d) the design of watercourse crossings and east-west corridor movements to give to effect of Condition E14; (e) landscaping: (i) landscape plan, hard and soft elements, for the corridor and the station precincts; (ii) use of native species from the relevant native vegetation community (or communities), where identified as appropriate; (iii) water sensitive urban design initiatives (vii) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (viii) measures to prevent wildlife strike risk in proximity to Western Sydney International Airport; (f) details of strategies to rehabilitate, regenerate or revegetate disturbed areas, where relevant; (g) management and routine maintenance standards and regimes for design elements and landscaping work (including weed management) to ensure the success of the design; (h) operational maintenance standards; and (i) the timing and responsibilities for implementation of elements included within the **PUDCLP**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, Rev02 April 2024 • Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024	C	The Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 1: Luddenham Station building & Stabling and Maintenance Facility, was finalised in was finalised in May 2024 and submitted to DPHI on 22/5/2024 (evidence sighted in previous IEA). Place, Urban Design and Corridor Landscape Plan (PUDCLP) Stage 2, RevF v2, 9/12/2024 was provided during IA3. The design has been regularly reviewed by the DRP. The DRP advice and recommendations and responses will be included in Appendix C of the Final Stage 2 PUDCLP submitted to DPHI for information. In accordance with **Condition E75**, DRP advice and recommendations, as issued by the Panel, and the Proponent's response to each recommendation is included in the final Stage 1 PUDCLP and issued to the Planning Secretary for information. Section 01.6 of the Stage 1 PUDCLP addressed compliance with each relevant SSI 10051 Condition of Approval. The compliance table and PUDCLP was reviewed during the audit. A summary of the dates of the DRP meetings and the issues raised by the DRP at these meetings is contained in Section 01 and Appendix C of the PUCLP Stage 1.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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 & ParkLife Metro, 5/8/2026	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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	Not triggered during the audit period.
SOCIO-ECONOMIC, LAND USE AND PROPERTY				
E82	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with third party property, and that such infrastructure and property is protected during construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	Auditees advised there has been no excavation to date for SSTOM that may pose a settlement risk or interference with third party property. Future SSTOM works in the vicinity of the St Marys Goods Shed will involve preparation of an Environmental Control Map (ECM) to identify relevant environmental aspects, including potential vibration and settlement impacts to the heritage-listed building. It is understood **Condition E102** relates predominantly to the SBT portion of the project for the tunnelling works. Groundwater has been encountered in the station boxes and SSTOM's responsibility for groundwater monitoring and settlement monitoring was triggered during the IA3 audit period. The Groundwater Monitoring Program is understood to have commenced. Refer to **Condition C22** for more information. Settlement and v bration monitors have been set up at the Goods Shed and settlement monitoring is ongoing.
E83	The utilities and services (hereafter "services") potentially affected by construction must be identified to determine requirements for diversion, protection and / or support. Alterations to services must be determined by negotiation between the Proponent and the service providers. Disruption to services resulting from construction must be avoided, wherever possible, and advised to customers where it is not possible.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Environmental Review - ER007 Bringelly Power Utility Installation Rev 2.0, dated 7/8/2025 • Environmental Review - ER008 St Marys Station Utility Works Rev 2.0, dated 15/10/2025 • STM Precinct Utility Package Design Report, Stage 2, RevA, dated 3/10/2023 • St Marys community notification Utility investigation works, December 2025 • Noise Monitoring Results, St Marys Station Utility Investigation works, dated 19/1/2026 • DBYD Job No 51599958, Potholing, 6 Queen Street St Marys, dated 11/11/25-25/11/25 • Endeavour Energy Notification of Network Alteration, Bringelly, dated 7/9/2025	C	Utility investigation works were undertaken in St Marys and at the Bringelly Services Facility during the audit IA5 period. There were no utility investigations undertaken during the IA6 audit period. Utilities works are planned in the St Marys Station precinct in the future, with associated planning approval pathways captured in Environmental Reviews (ER008 St Marys Station Utility Works Rev 2.0, dated 15/10/2025). The design report for services was made available for review during the audit and documents the framework for the identification and management of utility authority assets. Section 3.3 of the design report confirms the design is required to comply with obligations of Third-Party Agreements as stipulated in the Deed so that Sydney Metro is not in breach of complying with these agreements.
Condition Survey				
E84	A suitably qualified and experienced person must undertake condition surveys of all buildings, structures, utilities and the like identified in the documents listed in **Condition A1** and the further assessment carried out under mitigation measure GW1 of the Submissions Report as being at risk of damage before commencement of any work that could impact on the subject surface / subsurface structure. The results of the surveys must be documented in a Pre-construction **Condition Survey Report** for each item surveyed. Copies of **Pre-construction Condition Survey Reports** must be provided to the relevant owners of the items surveyed in the vicinity of the proposed work, and no later than one (1) month before the commencement of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Land Surveys Existing Condition Survey Report, Tram Sheds, St Marys 2760, Rev0, inspection date 30/5/2023	C	Auditees advised a number of pre-condition surveys were conducted under previous packages (SBT and SCAW). The Goods Shed at St Marys has been identified as being at risk of damage by future SSTOM works. It is understood that a pre-condition survey for the Goods Shed was conducted by SBT prior to works within the vicinity of the building. SSTOM provided a copy of a pre-condition survey for the Goods Shed (also understood to be known as the Tram Sheds), the inspection for which was conducted by Land Surveys on 30/5/2023, prior to SSTOM utilising the area of land near the Goods Shed previously. Auditees confirmed that no other buildings, structures, or utilities listed in **Condition A1** are at risk of being damaged by SSTOM works. All other high risk sites have been assessed by previous contractors as part of their scope of works, with SSTOM's works primarily consisting around building stations in pre-disturbed areas / scopes (or in greenfield areas with no structures present) or fit out on existing infrastructure that has installed by other (tunnels, viaducts etc).
E85	Condition surveys of all items for which condition surveys were undertaken in accordance with **Condition E84** must be undertaken by a suitably qualified and experienced person after completion of the work identified in **Condition E84**. The results of the surveys must be documented in a **Post-construction Condition Survey Report** for each item surveyed. Copies of **Post-construction Condition Survey Reports** must be provided to the landowners of the items surveyed, and no later than three (3) months following the completion of the work that could impact on the subject surface / subsurface structure.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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.
E86	The Proponent, where liable, must rectify any property damage caused directly or indirectly (for example from vibration or from groundwater change) by the work at no cost to the owner. Alternatively, the Proponent may pay compensation for the property damage as agreed with the property owner. Rectification or compensation must be undertaken within 12 months of completion of the work identified in **Condition E84** unless another timeframe is agreed with the owner of the affected surface or sub-surface structure or recommended by the **Independent Property Impact Assessment Panel (IPIAP).**	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Land Surveys Existing Condition Survey Report, Tram Sheds, St Marys 2760, Rev0, inspection date 30/5/2023	NT	There is no property damage known to have occurred as part of SSTOM.
E87	Appropriate equipment to monitor areas in proximity of ancillary facilities and the tunnel route must be installed during construction with particular reference to at risk buildings, structures and utilities identified in the condition surveys required by **Condition E84** and / or geotechnical analysis as required. If monitoring during construction indicates exceedance of the vibration criteria identified in the **DNVIS** prepared under **Condition E47**, or levels otherwise determined as appropriate by a suitably qualified structural engineer, then all construction affecting settlement must cease immediately and must not resume until fully rectified or a revised method of construction is established that will ensure protection of affected buildings.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	Not triggered within the audit period. There has been no damage determined to occur as a result of the project. Auditees advised no vibratory activities requiring vibration monitoring have been conducted during the audit period. It is understood that the existing v bration monitor attached to the St Marys Goods Shed and settlement monitoring requirements have been handed over to SSTOM by SBT and v bration and settlement monitoring is ongoing, though SSTOM has not commenced any work within safe working distances of the Goods Shed during the audit period.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E88	An **IPIAP** must be established prior to tunnelling activities commencing. The Planning Secretary must be informed of the members of the **IPIAP** and must comprise geotechnical and engineering experts independent of the design and construction team. The **IPIAP** will be responsible for independently verifying condition surveys undertaken under **Conditions E84** and **E85**, the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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	C	An Independent Property Impact Assessment Panel (IPIAP) has been established as set out in a letter from Sydney Metro to DPHI RE: SMWSA SSI 10051 Condition E8 – Notification of appointment of Independent Property Assessment Panel, dated 28/6/2023. The IPIAP relates to the entire Sydney Metro – Western Sydney Airport project. The below people will together, act in the capacity of the IPIAP that will be respons ble for independently verifying property condition surveys undertaken under **Conditions E84** and **E85**, the resolution of property damage disputes and the establishment of ongoing settlement monitoring requirements. The letter cited states the members are geotechnical and engineering experts that have a proven track record acting in the capacity of IPIAP members for other State Significant Infrastructure projects, they are: • Dr James Barbato, Associate Director of Mine Subsistence Engineering Consultants • Mr Daryl Kay, Director of Mine Subsistence Engineering Consultants • Mr Paul Roberts, Principal Associate of JK Geotechnics DPHI responded to the IPIAP nominations in an Appointment of Experts Letter, dated 30/6/2023. There have been no investigations or claims of property damage from the project under the IPIAP to date for SSTOM.
E89	Either the affected property owner or the Proponent may refer unresolved disputes arising from potential and/or actual property impacts to the **IPIAP** for resolution. All costs incurred in the establishing and implementing of the panel must be borne by the Proponent regardless of which party makes a referral to the **IPIAP**. The findings and recommendations of the **IPIAP** are final and binding on the Proponent.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	NT	There have been no SSTOM-related unresolved disputes within the audit period.
E90	Settlement must be monitored for any period beyond the minimum timeframe requirements of **Condition E87** if directed so by the **IPIAP** following its review of the monitoring data from the period not less than six (6) months after settlement has stabilised, consistent with **Condition E87**. The results of the monitoring must be made available to the Planning Secretary upon request.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSI-10051-PA-258 Appointment of Experts IPIAP, dated 30/6/2023	NT	SSTOM has not been directed to conduct settlement monitoring by the IPIAP during the audit period.
Small Business Owners Engagement Plan(s)				
E91	**Small Business Owners Engagement Plan(s)** must be prepared for St Marys and implemented in accordance with the **Overarching Community Communication Strategy** to minimise impact on small businesses directly affected by construction activities at St Marys during construction. The plan must be prepared and submitted to the Planning Secretary for information before the commencement of construction at St Marys.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection 9/02/2026 • PLM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023 • ParkLife Project website: https://parklifemetro.com.au/project/ • Complaints Register February-July 2026	C	The Small Business Owners Engagement Plan, St Marys was provided for review and was available on the PLM project website in the community section. Sydney Metro advised that the Small Business Owners Engagement Plan was originally prepared by CPBG prior to Project Construction commencement to satisfy this Condition, thus the requirement to submit to the Planning Secretary applies to the SBT contract, not SSTOM. One complaint from a local business was received about a work vehicle parking out the front, which was resolved and close-out documented in the Complaints Register.
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 *Contaminated Land Management Act 1997* (NSW). ***Note**: Nothing in this condition prevents the Proponent from preparing individual Detailed Site Investigation Reports (for contamination) for separate sites.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FIW Contamination Register to PLM_201223 • EMail from Tetratech to PLM RE: STM PRB Monitoring - 20 December 2024 and 17 January 2025, dated 28/1/2025	C	Detailed Site Investigation (DSI) reports for the WSA project were undertaken prior to commencement of the SSTOM package of works and prior to tunnelling and bulk excavation under previous contractors, SBT and SCAW. A list of DSIs conducted by previous contractors is recorded in a Contamination Register. The review of DSIs has not been verified as part of the SSTOM works package. No moderate-high-risk contaminated sites are known to have been identified for the SSTOM package of works. A contaminated groundwater plume is known to exist at the St Marys site from a former Dry Cleaners property. A Permeable Reactive Barrier (PRB) is in place to prevent migration toward the station box. Groundwater monitoring of the plume was initiated by the previous principal contractor and was recommenced by SSTOM on 20/12/2024. Coffey Geosciences have been engaged to conduct the groundwater monitoring. An email from Tetratech to PLM, dated 28/1/2025 was sighted and presents a the results from the 1st and 2nd PRB mitigation monitoring events completed on 20/12/2024 & 17/1/2025. Monitoring was conducted in four locations for Tetrachloroethene, Trichloroethene, Cis 1,2 DCE, & Vinyl Chloride. Results indicate chlorinated hydrocarbon concentrations were below the level of reporting, including in SBT-GW-0001 and SBT-GW-0001B which are located between the source area and the PRB.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E93	Should remediation be required to make land suitable for the final intended land use, a **Remedial Action Plan** must be prepared, or reviewed and approved, by consultants certified under either the Environment Institute of Australia and New Zealand's Certified Environmental Practitioner (Site Contamination) scheme (CEnvP(SC)) or the Soil Science Australia Certified Professional Soil Scientist Contaminated Site Assessment and Management (CPSS CSAM) scheme. The **Remedial Action Plan** must be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the Contaminated Land Management Act 1997 (NSW) and must include measures to remediate the contamination at the site to ensure the site will be suitable for the proposed use when the **Remedial Action Plan** is implemented. ***Note:*** *Nothing in this condition prevents the Proponent from preparing individual* ***Remedial Action Plans*** *for separate sites.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023 • Email from Tetra Tech Coffey to PLM RE: STM PRB Monitoring - 11 July 2025, dated 31/7/2025 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 5 - May 2025 Rev00, dated 8/10/2025 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 7 - July 2025 Rev00, dated 20/10/2025 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 9 - September 2025 Rev00, dated 12/12/2025 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 11 - November 2025 Rev00, dated 10/3/2026 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 13 - January 2026 Rev00, dated 21/5/2026 • SM-WSA-SSTOM-STM Station - St Marys Station Monthly Mitigation Report 16 - April 2026 Rev00, dated 15/7/2026	C	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. With handover of the St Marys Station site (STM) to SSTOM, implementation of the RAP is ongoing until completion of the station box. The STM site is subject to a Statutory Site Audit (Audit (TO-095)) by a NSW EPA Accredited Site Auditor, Tom Onus of Ramboll Australia Pty Ltd, under the NSW *Contaminated Land Management Act 1997* (CLM Act). Following a review of a Detailed Site Investigation (DSI) prepared by TTMP in August 2022, it was concluded by the Site Auditor in Interim Audit Advice that: "*Preparatory construction works are not considered to constitute remediation works because significant contamination was not identified in soils. However, the following actions are required to ensure any contamination identified during the works is dealt with appropriately to minimise risks to human health and the environment:* *• Spoil is to be assessed in accordance with Waste and Recycling Management Procedure* *• Spoil is to be inspected for ACM [asbestos-containing material] by a competent person and the AMP [Asbestos Management Plan] implemented if required.* *• Groundwater investigation data is to be obtained to inform requirements for any future remediation/management of groundwater and the dewatering procedures* *• Preparation of a site-specific risk assessment and RAP for groundwater remediation if required based on investigation results.* *• Bulk excavation below groundwater should not commence until groundwater has been adequately characterised and the site-specific risk assessment and RAP process are complete and approved by the Auditor.*" PLM has engaged Melissa Porter of Senversa as the EPA Site Auditor. The station box at STM will be tanked and informal updates are ongoing. For the purpose of the RAP, groundwater level is considered to be approximately 34m AHD consistent with the level reported in the Project Groundwater Monitoring Plan (GMP) for the Bringelly Shale Aquifer, which was adopted for the assessment of drawdown impacts associated with construction with an allowance for potential sustained groundwater inflow due to periods of sustained high rainfall. Monthly groundwater monitoring is being undertaken to determine the effectiveness of the Permeable Reactive Barrier (PRB) installed to manage groundwater contaminated with chlorinated hydrocarbons from the former dry cleaner at 1-7 Queen Street, St Marys. The PRB was installed to the west of St Marys Station in May 2023 to intercept the potential migration of chlorinated hydrocarbons in groundwater due to drawdown associated with the construction of the Station Box. The first ten rounds of monitoring indicate that chlorinated hydrocarbon concentrations are below the level of reporting, including in SBT-GW-0001 and SBT-GW-0001B which are located between the source area and the PRB. Results from the latest round of groundwater monitoring (April 2026) indicate: • Concentrations of chlorinated hydrocarbons in groundwater samples between the PRB and the station box remain below the laboratory LOR and the adopted trigger values. • ***Groundwater levels close to the Station excavation have been drawn down by the excavation. Although there was some initial recovery from groundwater level minimums in SBT-GW-1347c, levels in the deeper wells have mostly remained in the same range since early 2025, and have slowly decreased in shallow monitoring wells in 2025 and 2026.*** • No additional assessment or contingency measures are currently required. Results of the PRB monitoring program will continue to be provided to PLM on a monthly basis, with monthly reports documenting works completed, field and analytical results, and a summary of groundwater levels and gradients between the Station box excavation and the PRB.
E94	Before commencing remediation, a **Section B Site Audit Statement(s)** must be prepared by an NSW EPA-accredited Site Auditor that certifies that the **Remedial Action Plan(s)** is/are appropriate and that the site can be made suitable for the proposed use. The **Remedial Action Plan(s)** must be implemented and any changes to the **Remedial Action Plan(s)** must be approved in writing by the NSW EPA -accredited Site Auditor. ***Note:*** *Nothing in this condition prevents the Proponent from engaging an NSW EPA-accredited Site Auditor to prepare individual Site Audit Statements for Remedial Action Plans for separate sites.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to **Condition E93** for details.
E95	**Validation Report(s)** must be prepared in accordance with *Consultants Reporting on Contaminated Land: Contaminated Land Guidelines* (EPA, 2020) and relevant guidelines made or approved under section 105 of the *Contaminated Land Management Act 1997* (NSW). ***Note:*** *Nothing in this condition prevents the Proponent from preparing individual Validation Reports for separate sites.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to **Condition E93** for details. Remediation was ongoing at the time of IA5 and a Validation Report is not known to have been triggered.
E96	A **Section A1 or Section A2 Site Audit Statement** (accompanied by an **Environmental Management Plan**) and its accompanying **Site Audit Report,** which state that the contaminated land disturbed by the work has been made suitable for the intended land use, must be submitted to the Planning Secretary and the Relevant Council(s) after remediation and before the commencement of operation of the CSSI. ***Note:*** *Nothing in this condition prevents the Proponent from obtaining Section A Site Audit Statements for individual parcels of remediated land.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to **Condition E93** for details. There is no known requirement for the preparation of a Site Audit Report (SAR) or Site Audit Statement (SAS) for the SSTOM project to date. This condition will be triggered for PLM after the St Marys station box is tanked.
E97	A copy of **Detailed Site Investigation Report(s), Remedial Action Plan(s), Validation Report(s), Site Audit Report(s)** and **Site Audit Statement(s)** must be submitted to the Planning Secretary and the Relevant Council(s) for information.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Project website: https://parklifemetro.com.au/project/ • Sydney Metro Project website: https://www.sydneymetro.info/documents • FIW Contamination Register to PLM_201223 • St Marys Station Remedial Action Plan, Sydney Metro Western Sydney Airport Station Boxes and Tunnelling Works, RevA08, dated 23/5/2023	NT	A Remediation Action Plan (RAP) was prepared for St Marys Station by the previous Boxes and Tunnelling Works contract. Refer to **Condition E93** for details. DSI reports for the WSA project were undertaken prior to commencement of the SSTOM package of works and prior to tunnelling and bulk excavation under previous contractors, SBT and SCAW. A list of DSIs conducted by previous contractors is recorded in a Contamination Register. The review of DSIs has not been verified as part of the SSTOM works package. No moderate-high-risk contaminated sites are known to have been identified for the SSTOM package of works. A contaminated groundwater plume is known to exist at the St Marys site from a former Dry Cleaners property. Potential impacts of the plume on the project are being managed by implementation of the Groundwater Monitoring Program.
E98	An **Unexpected Contaminated Land and Asbestos Finds Procedure** must be prepared before the commencement of construction and must be followed should unexpected contaminated land or asbestos (or suspected contaminated land or asbestos) be excavated or otherwise discovered during construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM SWMP, Rev 04, 26/8/2025 • Contamination and Asbestos Unexpected Finds Procedure, Rev D, dated 9/6/2023	C	Appendix C of the SSTOM Soil and Water Management Plan (SWMP) sets out the Unexpected Finds Procedures (UFP) for contamination. The SWMP was submitted to DPHI on 29/11/2021, prior to the commencement of work. Refer to **Condition E99** for implementation of the Unexpected Contaminated Land and Asbestos Finds Procedure.

Item	
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Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E99	The **Unexpected Contaminated Land and Asbestos Finds Procedure** must be implemented throughout construction.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM SWMP, Rev 04, 26/8/2025 • Contamination and Asbestos Unexpected Finds Procedure, Rev D, dated 9/6/2023	NT	There were no unexpected contaminated land or asbestos finds identified during the IA6 audit period.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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).	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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. ***Note:*** *Nothing in this condition prevents the Proponent from preparing separate Sustainability Strategies for the construction and operational stages of the CSSI.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • 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. ***Note:*** *Nothing in this condition prevents the Proponent from preparing separate* ***Water Reuse Strategies*** *for the construction and operational stages of the CSSI.*	• PLM Sydney Metro WSA SSTOM Water Reuse Strategy Rev01, dated 15/5/2024 • https://parklifemetro.com.au/wp-content/uploads/2024/05/SMWSASSM-PLD-1NL-SB-PLN-000001-Sydney-Metro-WSA-SSTOM-Water-Reuse-Strategy-Rev-01 • Photos: Bradfield rain tanks, LDN rain tanks, OHE rain tanks, P3 Rain tanks, SMF rain tanks, provided 11/2/2025	C	The **E102** SSTOM Water Reuse Strategy has been prepared and was available on the PLM project website. The Water Reuse Strategy includes the following: • Water Balance Study • Train wash water Reuse • Rainwater tanks at stations and SMF • Use of recycled water mains water when available to site • Water efficiency strategies • Engagement with Sydney Water was undertaken as part of site establishment process to determine availability of non-potable water mains. Further engagement as part of development of the Water Reuse Strategy was not deemed necessary as available information was sufficient. No other relevant agencies were identified. The contents of the Water Reuse Strategy (a)-(e) have not been re-evaluated here as the strategy was prepared prior to the IA2 audit period. **Condition E102** was verified as compliant during IA1. Standpipes were observed to be setup at sediment basins for the efficient reuse of construction water for dust suppression. Auditees advised rainwater harvesting is used at site compounds for flushing toilets. Photos and the location of rain tanks in place were sighted at St Marys Station, Luddenham, Orchard Hills Station, Linewide Portion 3, and the SMF.
TRAFFIC AND TRANSPORT				
E103	Construction Traffic Management Plans (**CTMPs**) must be prepared in accordance with the Construction Traffic Management Framework. A copy of the **CTMPs** must be submitted to the Planning Secretary for information before the commencement of any construction in the area identified and managed within the relevant **CTMP**.	• Site inspection 9/02/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • PLM Overarching CTMP, Rev0, dated 28/6/2023 • CTMP St Marys Station, Rev01, dated 3/4/2024 • CTMP St Marys Station, DPHI Submission, dated 19/4/2024 • CTMP Orchard Hills Station, Rev02, dated 11/6/2024 • CTMP Orchard Hills Station, DPHI Submission, dated 6/8/2024 • CTMP Linewide RevB • CTMP Linewide, DPHI Submission, dated 5/8/2024 • CTMP St Marys Station, Rev03, dated 8/8/2025 • IA4 audit consultation, Penrith City Council, dated 8/8/2025 & PCC response, dated 22/8/2025 • Email correspondence from PLM's Traffic Manager, dated 26/8/2025 • Consultation with TTLG for STM CTMP including PCC, Emails RE: SM WSA - STTOM –STM - Construction Traffic Management Plan - St Mary's Station - Issued for Review, dated 29/8/2025-12/9/2025 • PLM Construction Worker Car Parking Strategy - St Marys Station Rev1, dated 28/5/2026	C	The CTMP for St Marys Station was updated to Rev3, dated 8/8/2025 during the IA4 audit period to address issues identified with the Phillip Street / Access Road A Intersection Sightline, which was also raised during consultation for IA4 with Penrith City Council: "*In January 2025 in response to a potential road safety risk identified by a member of the community Parklife Metro JV installed regulatory signage on Phillip Street, St Marys prohibiting on street parking. The regulatory signage was installed without notification to Council or approval. The signage remains in place to this day without the necessary consultation being undertaken or approvals being received*". In response to community-raised concerns about the sightline at the intersection of Access Road A and Phillip Street, a sightline assessment was undertaken. The assessment found that the installation of No Stopping parking restriction signage along the north side of Phillip Street will resolve the sightline concerns raised. Correspondence from PLM's Traffic Manager, dated 26/8/2025 states "*The updated CTMP has now been shared with Council informally, incorporating the technical assessment undertaken by our appointed traffic engineering consultant, which was previously shared with Council on 28 January 2025. Upon receipt of this formal commentary, we will make improvements to our internal processes to ensure any future traffic safety issues are resolved in a timely manner in consultation with Council.*" No updates were made to the Construction Traffic Management Plan (CTMP) during the IA6 audit period, though the CTMP will be updated once issues with the Worker Car Parking Strategy have been resolved, then approved by CJP (TfNSW) & submitted to DPHI. The Construction Worker Car Parking Strategy - St Marys Station Rev1, dated 28/5/2026 was sighted. Auditees advised the strategy had been reviewed by Penrith City Council and the ER. Refer to **Condition E109** for details.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Management of Heavy Vehicle Movements				
E104	The locations of all Heavy Vehicles used for spoil haulage must be monitored in real time and the records of monitoring be made available electronically to the Planning Secretary and the EPA upon request for a period of no less than one (1) year following the completion of construction.	• Site inspection 9/02/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Export Vehicle Activity Report XO90AH, dated 16/2/2026	C	SMF - haulage of spoil was documented in the Waste Tracking Register. An example of an Export Vehicle Activity Report XO90AH, dated 16/2/2026 was provided as evidence.
E105	Local roads proposed to be used by Heavy Vehicles to directly access ancillary facilities / construction sites that are not identified in the documents listed in **Condition A1** must be approved by the Planning Secretary and be included in the **CTMP**.	• Site inspection 9/02/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Heavy Vehicle Local Roads Report for Use of Local Roads - Orchard Hills Revision C, dated 19/11/2024 • DPHI Submission OHE HVLR Rev A (PA-427), dated 19/8/2024 • DPHI Submission OHE HVLR Rev C (PA-527), dated 29/11/2024 • DPHI Letter to Sydney Metro RE: Orchard Hills Request for Approval of Heavy Vehicle Local Roads - Sewerage Connection, dated 9/1/2025 • Trafficworks Letter RE: Response to Condition E106 of SSI 10051, Paul Mihailidis Level 3 Road Safety Auditor, dated 3/10/2024 • Heavy Vehicle Local Roads Report for Use of Local Roads - Orchard Hills Revision D, dated 20/3/2026 • DPHI Submission OHE HVLR Rev D (PA-4702, dated 30/3/2026 • Email from SM to DPHI RE: SM-WSA Submission of Heavy Vehicle Local Roads (SSTOM) report per Condition E105 & E106, dated 20/3/2026 • Email from DPHI to SM RE: WSA-SSTOM Orchard Hills, Heavy Vehicle Local Roads Report (the HVLR), dated 31/3/2026	C	Spoil haulage routes have been approved as documented in CTMPs. A Heavy Vehicle Local Roads Assessment for the Use of Local Roads (HVLR) to facilitate sewerage connection works was conducted for Orchard Hills and submitted to DPHI for approval on 29/11/2024. The HVLR was prepared in consultation with Penrith City Council and endorsed by Paul Mihailidis, Level 3 Road Safety Auditor. Auditees advised no issues were raised by DPHI upon review of the HVLR. The use of the following roads was subsequently approved by the Department under Condition E105 (in a letter dated 9/1/2025): • Lansdowne Road between Kent Road and Samuel Marsden Road • Samuel Marsden Road north of Lansdowne Road • The first 70m of Samuel Marsden Road south of Lansdowne Road • The first 40m of Flinders Avenue east of Samuel Marsden Road The approval is limited to the period commencing 9/1/2025 and ending 1/2/2026. Auditees advised there was no heavy vehicle use on local roads not approved under a Local Roads Report during the IA6 audit period, and no new Local Road Assessments prepared. The Orchard Hills HVLRA Revision D Report was updated to extend dates to 31 December 2026 during IA6, which was approved by DPHI in a letter dated 31/3/2026.
E106	All requests to the Planning Secretary for approval to use local roads under **Condition E105** above must include the following: (a) a swept path analysis; (b) demonstration that the use of local roads by Heavy Vehicles for the CSSI will not compromise the safety of pedestrians and cyclists of the safety of two-way traffic flow on two-way roadways; (c) details as to the date of completion of the road dilapidation surveys for the subject local roads; and (d) measures that will be implemented to avoid where practicable the use of local roads past schools, aged care facilities and child care facilities during their peak operation times; and (e) written advice from an appropriately qualified professional on the suitability of the proposed Heavy Vehicle route which takes into consideration items (a) to (d) of this condition.	• Site inspection 9/02/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Heavy Vehicle Local Roads Report for Use of Local Roads - Orchard Hills Revision C, dated 19/11/2024 • DPHI Submission OHE HVLR Rev A (PA-427), dated 19/8/2024 • DPHI Submission OHE HVLR Rev C (PA-527), dated 29/11/2024 • DPHI Letter to Sydney Metro RE: Orchard Hills Request for Approval of Heavy Vehicle Local Roads - Sewerage Connection, dated 9/1/2025 • Heavy Vehicle Local Roads Report for Use of Local Roads - Orchard Hills Revision D, dated 20/3/2026 • DPHI Submission OHE HVLR Rev D (PA-4702, dated 30/3/2026 • Email from SM to DPHI RE: SM-WSA Submission of Heavy Vehicle Local Roads (SSTOM) report per Condition E105 & E106, dated 20/3/2026 • Email from DPHI to SM RE: WSA-SSTOM Orchard Hills, Heavy Vehicle Local Roads Report (the HVLR), dated 31/3/2026	C	All spoil haulage routes have been approved as documented in CTMPs. Auditees advised there has been no requirement to undertake a Heavy Vehicle Local Road (HVLR) Assessment to date. Future HVLR Assessments are expected to be required for the Orchard Hills site. There were no heavy vehicles observed on local roads during the site inspection. A Heavy Vehicle Local Roads Report for Use of Local Roads (HVLR) - Orchard Hills was submitted to DPHI for approval on 29/11/2024 to facilitate sewerage connection works. The HVLR was prepared in consultation with Penrith City Council and endorsed by Paul Mihailidis, Level 3 Road Safety Auditor. No issues were raised by DPHI. The use of the following roads was subsequently approved by the Department under **Condition E105**: • Lansdowne Road between Kent Road and Samuel Marsden Road • Samuel Marsden Road north of Lansdowne Road • The first 70m of Samuel Marsden Road south of Lansdowne Road • The first 40m of Flinders Avenue east of Samuel Marsden Road The approval is limited to the period commencing 9/1/2025 and ending 1/2/2026. Auditees advised there was no heavy vehicle use on local roads not approved under a Local Roads Report during the IA6 audit period, and no new Local Road Assessments prepared. The Orchard Hills HVLRA Revision D Report was updated to extend dates to 31 December 2026 during IA6, which was approved by DPHI in a letter dated 31/3/2026.

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Road Dilapidation				
E107	Before any local road is used by a Heavy Vehicle for the purposes of construction of the CSSI, a **Road Dilapidation Report** must be prepared for the road. A copy of the **Road Dilapidation Report** must be provided to the Relevant Road Authority(s) within three (3) weeks of completion of the survey and at no later than one (1) month before the road being used by Heavy Vehicles associated with the construction of the CSSI.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Land Surveys Existing Condition Survey Report, Road Corridor - Patons Lane, Rev0, dated 1/6/2023 • Land Surveys Existing Condition Survey Report, Road Corridor - Reserve Road, Rev0, dated 1/6/2023 • Email from PLM Survey Manager to Penrith City Council RE: Road Dilapidation Surveys, dated 13/7/2023 • SM-WSA SSTOM STM/LDN/SMF/OHE Local Road Condition Report (PCC) RevA, dated 6/5/2024 • Land Surveys Orchard Hills Road Condition Report Version 1, dated 21/3/2025 • Email from PLM Traffic Manager to Penrith City Council RE: SSTOM - Road Condition Report (Samuel Marsden Rd - Informal issue) & Condition report - PCC roads, dated 26/5/2025	C	Two Road Pre-Condition Dilapidation Surveys were sighted - Reserve Road (1/6/2023) and Patons Lane (1/6/2023). Verification of submission of these road dilapidation reports to the Relevant Road Authority, and date of first use of the road by heavy vehicles was outside the audit period so was not verified. An email from PLM, dated 13/7/2023 lists road dilapidation reports were also prepared for: Gipps Street, Luddenham Road North, Luddenham Road South, Patons Lane, Reserve Road, Putland Street (though timing for these was outside the scope of this audit, and should have been satisfied under the PC of a previous contractor - not verified). A Road Dilapidation Report for Orchard Hills Road was sighted during IA4, dated 21/3/2025. The report was submitted to Penrith City Council on 26/5/2025. PLM advised Samuel Marsden Road had not yet been utilised for heavy vehicles at the time of IA4. There were no road dilapidation surveys completed during the IA6 audit period.
E108	If damage to roads occurs as a result of the construction of the CSSI, the Proponent must either (at the Relevant Road Authority's discretion): (a) compensate the Relevant Road Authority for the damage so caused; or (b) rectify the damage to restore the road to at least the condition it was in pre-work as identified in the **Road Dilapidation Report**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • Site inspection, 3/8/2026 • Road Repair - Luddenham Rd, email from Penrith City Council to PLM, dated 1/12/2025	C	Auditees advised any road damage attributed to SSTOM had been fixed and there were no significant potholes identified during the audit period, or during the audit site inspection. It is understood that SSTOM has come to an agreement with Penrith City Council whereby future rectification of road damage will be able to be conducted without an ROL, and thereby expediating the process by improved efficiencies. Auditees advised damage to Derwent Road, Bringelly and Luddenham Road, Luddenham was identified and rectified during the IA5 audit period. : PLM advised they paid Council a portion of the cost for road repair as the party respons ble for the damage couldn't be attributed to the SSTOM project in whole. No road damage was identified during the IA6 audit period. **NB:** *Email correspondence from Council was provided, dated 1/12/2025 but did not confirm payment to Council for road rectification at Luddenham Road. PLM advised the payment is still being processed and evidence of payment will be available during IA6.* The ER indicated road damage rectification had not been raised as an issue during ER inspections.

Item	
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Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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 queueing on state and regional roads; (c) not carry out marshalling of construction vehicles near sensitive land use(s); (d) not block or disrupt access across pedestrian or shared user paths at any time unless alternate access is provided; and (e) ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the **CTMP**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • Site inspection, 3/8/2026 • PLM Overarching CTMP, Rev0, dated 28/6/2023 • CTMP Orchard Hills Station, Rev02, dated 1/6/2024 • Construction Worker Car Parking Strategy, St Marys Station Rev0, dated1/12/2023 • CTMP St Marys Station, Rev01, dated 3/4/2024 • CTMP, Appendix E Drivers Code of Conduct • Construction meeting minutes 23/120/25 • NCR 017 - Condition A109 SSTOM Construction Worker Car Parking Strategy – St Marys Station, dated 15/12/2025 • DPHI Submission - SM-WSA SSTOM NCR 017 - E109 Non-Compliance (SSI-10051-PA-678), dated 19/12/2025 • Consultation with TTLG for STM CTMP including PCC, Emails RE: SM WSA - STTOM –STM - Construction Traffic Management Plan - St Mary's Station - Issued for Review, dated 29/8/2025-12/9/2025 • PLM Construction Worker Car Parking Strategy - St Marys Station Rev1, dated 28/5/2026	C	Section 5.2 of the Overarching CTMP states: "*There will be a shortfall in the amount of on-site parking provision at St Marys. The site-specific Parking Management Plan for St Marys will seek to minimise the impact of the overall demand for construction worker parking through initiatives such as:* • *Investigation of remote parking facility options in conjunction with the provision of shuttle buses* • *Promotion of carpooling* • *Encouraging the use of public transport* *Parklife Metro will endeavour to ensure the impact of the contractor parking demand within the St Marys area will not adversely affect the St Marys CBD and residential amenities (existing car parking spaces)*". The worker car parking strategy includes stakeholder consultation and respons bilities (Parklife Metro, Penrith City Council and TfNSW). Section 5 of the Strategy includes travel arrangements for workers and plans for communication, satellite parking arrangements and a travel mode needs survey. Section 4.5.2 of the CTMP details the truck routes and has truck swept paths in Appendix A to manage disruption of public access. Section 5 of the CTMP sets out requirements for traffic impact management. The surrounding areas of St Marys Station were inspected during the audit. Initiatives to reduce worker parking on public streets were observed. (a) Signage including a map indicating restricted parking zones for worker vehicles was displayed on the St Marys construction site hoarding. Signage in 'high risk' streets surrounding the development was observed "*Resident and Customer Parking Only. Sydney Metro Parking Prohibited*" to discourage workers from parking in these areas. (b) CTMP Appendix E Drivers Code of Conduct includes commitment "*Do not queue on public roads unless a prior approval has been sought*", reference to idling is included in Section 4.2 of the Overarching CTMP. (c) There is a limit on the number of trucks allowed to queue on Patons Lane, and for the SMF, and allowance for truck marshalling inside these sites has been implemented to reduce queuing on public roads. (d) No restriction of access is known to have occurred. There were no project vehicles observed idling or parked in the vicinity of St Marys Station during the audit site inspection. (e) **Condition E109** is addressed in the Overarching CTMP, including a commitment to ensure spoil haulage vehicles adhere to the nominated haulage routes identified in the CTMP. During the previous audit (IA5), the project self-reported a NC with **Condition E109(a)** which was related to worker parking on public roads and a sp ke in complaints from affected residents. Actions taken to reduce this impact were discussed during the audit and included: Checks undertaken during PLM weekly enviro inspection and ER inspections. Ongoing discussions with residents and the further restriction of parking in 'no parking' areas has reduced the number of ongoing complaints about this issue to nil during the IA6 audit period. The Worker car parking strategy has been updated to amend wording in some areas from '*no parking*' to 'parking discouraged (or similar)' so the does not remain an ongoing issue. During IA5 the auditor recommended further investigation into the use of alternative parking locations for workers. At the time of IA6 negotiations with TfNSW were underway for the use of 50 additional parking spots at the Harris Street Commuter Car Park. No updates were made to the Construction Traffic Management Plan (CTMP) during the IA6 audit period, though the CTMP will be updated once issues with the Worker Car Parking Strategy have been resolved, then approved by CJP (TfNSW) & submitted to DPHI. The Construction Worker Car Parking Strategy - St Marys Station Rev1, dated 28/5/2026 was sighted. Auditees advised the strategy had been reviewed by Penrith City Council and the ER.
Property Access				
E110	Access to all utilities and properties must be maintained during works, unless otherwise agreed with the relevant utility owner, landowner or occupier.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026	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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026	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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026	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.

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E113	Any property access physically affected by the CSSI must be reinstated to at least an equivalent standard, unless otherwise agreed by the landowner or occupier. Property access must be reinstated within one (1) month of the work that physically affected the access is completed or in any other timeframe agreed with the landowner or occupier.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026	**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.	• Site inspection, 3/8/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • PLM Small Business Owners Engagement Plan, St Marys, Rev0, dated 10/11/2023 • Community Consultation Strategy (CCS) • Construction Worker Car Parking Strategy - St Marys Station - Rev 0, dated 1/12/2023 • PLM Overarching CTMP, Rev0, dated 28/6/2023	**C**	Pedestrian, cyclist and vehicular access management are detailed in the sighted documents. Adequate signage has been implemented as per site observations and audit discussions. There have not been any complaints recorded on this matter. St Marys station was included in the scope of the site inspection for IA6; signage was installed on streets within close proximity of the sites and read '*Resident and Customer Parking Only, Sydney Metro Parking Prohibited*', and temporary closure of pedestrian access to St Marys station and alternative route map.
Pedestrian and Cyclist Access				
E115	Safe pedestrian and cyclist access must be maintained around the St Marys construction site during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, a proximate alternate route which complies with the relevant standards, must be provided and signposted before the restriction or removal of the impacted access.	• Site inspection, 3/8/2026 • Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Community Consultation Strategy (CCS) • CTMP St Marys Station, Rev02, dated 3/5/2024	**C**	As per the PLM Overarching CTMP Section 4.2, PLM has committed to providing alternate cyclist and pedestrian routes, where these may conflict with construction access/ egress. Any alternate route is to comply with the relevant standards. The CTMP commits to the installation of site safety from site establishment which includes the provision of site specific inductions/mandatory training for personnel around expectation for site operations and interactions with the community. Safe pedestrian and cyclist access was observed around the St Marys Station site during the audit site inspection. Access ble footpaths were observed and clear around the site perimeter hoarding and into and out of St Marys Station. There have been no known instances of restricted pedestrian or cyclist access to date around the St Marys site.
Road Traffic and Safety				
E116	A **Traffic and Transport Liaison Group(s)** must be established in accordance with the Construction Traffic Management Framework to inform the development of **CTMP**.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Metro WSA TTLG Meeting 55 - SSTOM Presentation - 5/2/2026 • Metro WSA TTLG Meeting 55 - Minutes - 5/2/2026 • Metro WSA TTLG Meeting 56 - SSTOM Presentation - 5/3/2026 • Metro WSA TTLG Meeting 56 - Minutes - 5/3/2026 • Metro WSA TTLG Meeting 57 - SSTOM Presentation - 2/4/2026 • Metro WSA TTLG Meeting 57 - Minutes - 2/4/2026 • Metro WSA TTLG Meeting 60 - SSTOM Presentation - 2/7/2026 • Metro WSA TTLG Meeting 60 - Minutes - 2/7/2026	**C**	A Traffic and Transport Liaison Group (TTLG) has been established for WSA. Meeting minutes were sighted from February to July 2026. As per the PLM Overarching CTMP Section 1.6, Sydney Metro is responsible for establishment of the TTLG. PLM participate when necessary for SSTOM and provide the TTLG with required documentation. Three examples of presentations by PLM at the TTLG were provided as evidence, dated February to July 2026.
E117	Supplementary analysis and modelling as required by TfNSW 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 TfNSW requirements. Copies of civil, structural and traffic signal design plans shall be submitted to the Relevant Road Authority for consultation during design development and before completion of construction of the CSSI.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Metro WSA TTLG Meeting 55 - SSTOM Presentation - 5/2/2026 • Metro WSA TTLG Meeting 55 - Minutes - 5/2/2026 • Metro WSA TTLG Meeting 56 - SSTOM Presentation - 5/3/2026 • Metro WSA TTLG Meeting 56 - Minutes - 5/3/2026 • Metro WSA TTLG Meeting 57 - SSTOM Presentation - 2/4/2026 • Metro WSA TTLG Meeting 57 - Minutes - 2/4/2026 • Metro WSA TTLG Meeting 60 - SSTOM Presentation - 2/7/2026 • Metro WSA TTLG Meeting 60 - Minutes - 2/7/2026 • PLM Overarching CTMP, Rev0, dated 28/6/2023 • CTMP St Marys Station, Rev02, dated 3/5/2024	**NT**	As per the PLM Overarching CTMP Section 4.6, measures have been proposed for the scheduling of heavy vehicles to minimise the impact on road users during the SSTOM works including: • Initial induction, mandatory training and regular briefings for all transport contractors • Logistics monitoring to identify and regulate truck operations • Providing personnel at the site gates, if necessary to meter the despatch of trucks onto the road network • Management of truck movements along discrete routes to minimise cumulative impacts from heavy vehicles (see haulage routes in Annexure A) • Regular checks of special and other events, not associated with SSTOM work activities, that could impact on heavy vehicle operations • Scheduling, where feasible, to avoid operating school zones, high pedestrian activity times and peak road periods • Heavy vehicles will access the arterial roads via the most direct route. For spoil haulage vehicles Parklife Metro D&C will use a software platform to manage and monitor truck movements. These records can be supplied to the relevant authorities and will be retained for one year post the completion of works. Permanent road works have not commenced for the SSTOM project. **NB:** Refer to **Condition E103** for observation and recommendations around improvements to consultation in relation to traffic management and traffic safety.
E118	As part of **Condition E117** the **Traffic and Transport Liaison Group(s)** is to identify opportunities to improve the intersection performance during operation at: (a) Queen Street/Great Western Highway/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.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Metro WSA TTLG Meeting 55 - SSTOM Presentation - 5/2/2026 • Metro WSA TTLG Meeting 55 - Minutes - 5/2/2026 • Metro WSA TTLG Meeting 56 - SSTOM Presentation - 5/3/2026 • Metro WSA TTLG Meeting 56 - Minutes - 5/3/2026 • Metro WSA TTLG Meeting 57 - SSTOM Presentation - 2/4/2026 • Metro WSA TTLG Meeting 57 - Minutes - 2/4/2026 • Metro WSA TTLG Meeting 60 - SSTOM Presentation - 2/7/2026 • Metro WSA TTLG Meeting 60 - Minutes - 2/7/2026 • PLM Overarching CTMP, Rev0, dated 28/6/2023 • CTMP St Marys Station, Rev02, dated 3/5/2024	**C**	As per the PLM Overarching CTMP this requirement is held by Sydney Metro and improvements are required to be implemented prior to the commencement of operation. A potential differing interpretation of the terms of the approval was identified during the IA3 audit period and was ongoing during IA6. Sydney Metro remain in the process of seeking clarification with DPHI on **Condition E118** requirements in relation to the delivery of traffic performance at intersections. One intersection upgrade was originally identified as required to increase project performance, though consultation with Penrith City Council has identified some additional intersection upgrades they would like included. Consultation with Penrith CC is ongoing to resolve the number of intersection upgrades required. Associated works have not yet commenced. TTLG conducted modelling which was found to only impact (a).

Item	
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Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 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, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users must be subject to safety audits demonstrating consistency with relevant design, engineering and safety standards and guidelines. Safety audits must be prepared in consultation with the relevant **Traffic and Transport Liaison Group** before the completion and use of the subject infrastructure and must be made available to the Planning Secretary upon request.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Metro WSA TTLG Meeting 55 - SSTOM Presentation - 5/2/2026 • Metro WSA TTLG Meeting 55 - Minutes - 5/2/2026 • Metro WSA TTLG Meeting 56 - SSTOM Presentation - 5/3/2026 • Metro WSA TTLG Meeting 56 - Minutes - 5/3/2026 • Metro WSA TTLG Meeting 57 - SSTOM Presentation - 2/4/2026 • Metro WSA TTLG Meeting 57 - Minutes - 2/4/2026 • Metro WSA TTLG Meeting 60 - SSTOM Presentation - 2/7/2026 • Metro WSA TTLG Meeting 60 - Minutes - 2/7/2026 • PLM Overarching CTMP, Rev0, dated 28/6/2023 • CTMP St Marys Station, Rev02, dated 3/5/2024 • SM-WSA Traffic Management Road Safety Audit Report Draft, Traffic Works, dated 11/8/2023	NT	No permanent road works, including vehicular access, signalised intersection works, and works relating to pedestrians, cyclists, and public transport users had commenced for SSTOM.
UTILITIES MANAGEMENT				
E120	The CSSI must be designed and constructed with the objective of minimising impacts to, and interference with utilities infrastructure, and that such infrastructure and property is protected during construction. Utilities, services and other infrastructure potentially affected by construction must be identified before works affecting the item, to determine requirements for access to, diversion protection, and / or support. The relevant owner(s) and / or provider(s) of services must be consulted to make suitable arrangements for access to diversion, protection, and / or support of the affected infrastructure as required. The Proponent must ensure that disruption to any service is minimised and be respons ble for advising local residents and businesses affected before any planned disruption of service.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • STM Precinct Utility Package Design Report, Stage 2, RevA, dated 3/10/2023	C	PLM has prepared a design report for the utilities package of works for St Marys (STMUT0400), which had not commenced at the time of the audit. The design report was prepared to document the framework for the identification and management of utility authority assets including: • Relocation of existing utilities impacted by the proposed bus interchange along the southern verge of Station Street including • Decommissioning of the temporary construction power installed as part of SBT works • Proposed new electrical ducts on the northern verge of Station Street to cater for future precinct developments • Provision of new DN200 water main along Station Street from Queen Street to Glossop Street as per Sydney Water NOR to cater for firefighting requirements and future precinct water demand • Establish connection to goods shed for all utilities • Establish point of connection for any lead in works, and • Space proof and coordinate the civil and urban design around existing utilities to be retained. Section 6.1 of the Utility Design Report commits to implementation of the Utility Strategy. The overarching strategy to manage utility impacts is to: • Identify public utility assets within the project areas. • Undertake a utility impact assessment of the proposed works. The assessment aims to identify: o Physical impacts from the proposed works, including road, drainage, TCS, structures, etc. o Impact from a constructability, accessibility, and maintainability perspective. • Where impact to an asset is unavoidable, one of the three treatments have been adopted: o Protect during construction – temporary mechanical protection during construction or a change in construction methodology. o Protect – permanent protection of the utility in its current position, e.g., protection slab, concrete encasement, etc. o Relocate the utility There has been no excavation that has disrupted utilities undertaken during the audit period. Utility investigation works for St Marys were undertaken including utility location and waste classification during the IA5 audit period.
Warragamba to Prospect Water Supply Pipeline				
E121	The proponent must consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, and ensure that proposed construction and operational agreements are consistent with the "Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines" and implement all practical measures to protect the Warragamba to Prospect Water Supply Pipelines infrastructure, or as otherwise agreed to by WaterNSW.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM NVMP, Rev 04, 13/11/2025	C	Section 6.4.3 of the SSTOM NVMP sets out the requirements for work near v bration sensitive structures, including heritage-listed structures. In accordance with **REMM NAH8**, a dilapidation survey of the Warragamba to Prospect Water Supply Pipelines has been completed by Sydney Metro. Prior to commencement of SSTOM Works, Parklife Metro D&C would consult with WaterNSW regarding design, construction and operational management where the proposal interacts with the Warragamba to Prospect Water Supply Pipeline, in accordance with **Condition E121.** Construction and operational agreements with WaterNSW would be consistent with the "*Guidelines for Development Adjacent to the Upper Canal and Warragamba Pipelines (WaterNSW, Sep 2021)*". There was no known interface with the pipeline area during the audit period. The pipeline is fenced.
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 poss ble, waste must be treated or disposed of.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • SSTOM Waste Tracking Register • We Build January 2026 Monthly Waste Report • Djurwa Pty Ltd-We-build SPA Waste Report • PLM Waste Management Sub-plan, Rev 03, 3/12/2025	C	The project waste register for the period was sighted, and documented waste tracking requirements in the Waste Management Sub-plan (WMP) were reviewed. The waste hierarchy as per the WARR Act is described in Section 5.1 of the WMP. Austip provides a Monthly Waste Report for Construction and office waste collected from each SSTOM site. Total recycled waste to date was reported as 95.39% across SSTOM sites. A Waste Tracking Register was sighted and includes: Site Name, Address, Product, Waste Type, Net Weight etc. Refer to **Conditions E124 & E125** for verification of the movement of spoil between SSTOM sites and to offsite disposal facilities.

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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 *Protection of the Environment Operations (Waste) Regulation 2014*, as the case may be.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • PLM Waste Management Sub-plan, Rev 03, 3/12/2025 • BRD Material Management Tracker (Import), extract dated 15/4/2026-23/4/2026 • SMF Imported Material Tracker, extract dated 12/2/2026-3/6/2026 • STM (St Marys) Material Tracking Register (Import), extract dated 28/7/2026-3/8/2026 • **SMF Imported Material:** • **Shale (Import from 275 Adams Road, Luddenham NSW 2745):** • 4 Pillars VENM Report, 275 Adams Road, Luddenham NSW 2745, dated 12/8/2024 • NSW EPA Section 143 Certificate, VENM , 800,000m^3, to the SMF, dated 13/3/2025 • WeBuild Acceptance Letter (VENM from Load & Go), undated • **Topsoil (Import from 221-227 Luddenham Road, Orchard Hills NSW 2748):** • Hawk Geo ENM Classification Report, B&K Revegetation & Landscaping Pty Ltd, 221-227 Luddenham Road, Orchard Hills NSW 2748, dated 22/10/2025 • NSW EPA Section 143 Certificate, naturally occurring soil materials that meets the NSW EPA 2014 Resource Recovery Order for ENM , 32,870 Tonnes, to the SMF & Portion 4, dated 26/11/2025 • WeBuild Acceptance Letters (x2) (Stockpiled soil from Co-ordinated Infrastructure Pty Ltd), undated • **St Marys imported Material (from SSTOM Luddenham Station):** • Beneficial reuse under land use criteria for industrial sites (HILD) : • Stantec Stockpile Assessment Report, Luddenham Metro Station Ref: 305001488, dated 28/7/2026 • **Bradfield Station imported Material (from SSTOM Orchard Hills Station):** • Alliance Recovered Aggregate (Batch) Material Report Ref: 17614.3.1-ER-1-3R1, dated 27/1/2026	**C**	Material from the Sydney Metro Western Tunnelling Package (WTP) has been imported to SSTOM as Exempt Material in accordance with the Sydney Metro West (Stage 1 and Stage 2) Tunnel Spoil Order April 2024. Refer to previous audit reports for details. Spoil tracking is also undertaken between sites for beneficial reuse in accordance with procedures in the PLM Waste Management Sub-plan. Shale from Luddenham Operations (VENM) was imported to the SMF during the IA5 and IA6 audit periods. A Material Tracking Register for SMF was provided as evidence and included records of material import from 7/8/2025-5/2/2026. A corresponding s143 Certificate, dated 13/3/2025 was sighted for the material imported to the SMF. The s143 Certificate covers 800,000m^3 of material and confirms the material is VENM (Waste as per 20240520KLF_VENM_1.0 VENM Report). Topsoil (ENM) from B&K Revegetation & Landscaping Pty Ltd, Luddenham was imported to the SMF during the IA5 audit period. A Material Tracking Register for SMF was provided as evidence and included records of material import from 7/8/2025-5/2/2026. Corresponding s143 Certificates, dated 17/11/2025 & 26/11/2025 were sighted for the material imported to the SMF. The s143 Certificates cover 32,870 Tonnes and 38,400 Tonnes of material respectively and confirm the material is "*naturally occurring soil materials that meets the NSW EPA 2014 Resource Recovery Order for ENM*". The following material was imported during the IA6 audit period: • Crushed sandstone was imported from SSTOM Orchard Hills to Bradfield Station. The material was classified as 'Recovered aggregate' under the Recovered aggregate exemption (2014). The Alliance Waste classification report 17614.3.1-ER-1-3R1 was sighted. • Topsoil (ENM) from 221-227 Luddenham Road development site - Placed at SMF • Shale (VENM) from 275 Adams Road, Luddenham NSW 2745 development site - Placed at SMF • Material from 581B Luddenham Rd (Luddenham Station) to St Marys Station for beneficial reuse under land use criteria for industrial sites (HILD) in accordance with a Stockpile Assessment Report. The material import tracker includes: Source, Date, General Description, Quantity (Tonnes), Material Classification, Onsite Placement, & Truck registration. PLM maintain a Waste tracking register for each site to document the spoil type, quantity and destination where it is lawfully accepted. The waste import and tracking process is documented in the Waste Management Sub-Plan Section 5, Appendix B – 1.3 and Figure B1. Routine spoil assessments/classification are conducted at the generating site and monthly inspections at the receiving site represents PLMs internal auditing system to ensure compliance. **NB:** *This audit does not constitute a full waste compliance audit and conclusions are based on representative documents and records provided for review.*
E124	Waste must only be exported to a site licensed by the EPA for the storage, treatment, processing, reprocessing or disposal of the subject waste, or in accordance with a Resource Recovery Exemption or Order issued under the *Protection of the Environment Operations (Waste) Regulation 2014*, or to any other place that can lawfully accept such waste.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • PLM Waste Management Sub-plan, Rev 03, 3/12/2025 • Orchard Hills Station Material Tracking Register, extract dated 15/4/2026-23/4/2026	**NT**	Section 5.5 of the SSTOM WMP outlines the process for waste transport and disposal. A hold point has been set for the project and includes the following steps: • Review and approval of the completed Section 143 documentation if the material is going to a receiving site not licensed by the EPA • Review of receiving sites development application, planning approval or EPL to ensure the site holds the correct licence and/or approval to receive such material. A list of licenced waste disposal facilities in proximity to SSTOM Works has been developed and will be updated to include any other disposal or beneficial reuse sites identified during SSTOM Works (Appendix D). Disposal of the material will not occur until the Environment Manager has released the hold point. Requirements for waste tracking and reporting are documented in Section 5.5.1 of the SSTOM WMP and exemptions are outlined in Section 5.5.2. A Register of indicative waste disposal locations is included in Appendix D of the SSTOM WMP and includes the EPL Number for each location. Auditees advised spoil, ENM & VENM is allowed to be moved between PLM EPL premise sites under the Waste Management Sub-plan. An internal tracking register is maintained for each site. REMM WR3 requires a material tracking system would be implemented for material transferred between construction sites. A Spoil Management Tracker is maintained for material moved between SSTOM project sites under the same EPL Premise Maps. Crushed concrete (classified as 'Recovered aggregate' under the Recovered aggregate exemption (2014) sourced from the concrete crushing activity at Orchard Hills Station was transported to Bradfield Station for reuse during the IA6 audit period. An extract from the Material Tracking Register (15/4/2026-23/4/2026) was provided for review during the audit. Information in the register included: Date, Source Location, Quantity (Tonnes), Material Classification, Offsite Placement, Haulage Contractor, Truck Rego, EPL / Approval Ref, Docket No., & Waste Classification Report Reference. There was no asbestos-contaminated (or other contaminated) spoil disposed during the audit period, and no other spoil disposed offsite to licensed facilities 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
E125	All waste must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ER Interview, 7/8/2026 • PLM Waste Management Sub-plan, Rev 03, 3/12/2025 • Orchard Hills Station Material Tracking Register, extract dated 15/4/2026-23/4/2026 • BRD Material Management Tracker (Import), extract dated 15/4/2026-23/4/2026 • Alliance Recovered Aggregate (Batch) Material Report Ref: 17614.3.1-ER-1-3R1, dated 27/1/2026 • SMF Imported Material Tracker, extract dated 12/2/2026-3/6/2026 • 4 Pillars VENM Report, 275 Adams Road, Luddenham NSW 2745, dated 12/8/2024 • Hawk Geo ENM Classification Report, B&K Revegetation & Landscaping Pty Ltd, 221-227 Luddenham Road, Orchard Hills NSW 2748, dated 22/10/2025 • STM (St Marys) Material Tracking Register (Import), extract dated 28/7/2026-3/8/2026 • Stantec Stockpile Assessment Report, Luddenham Metro Station Ref: 305001488, dated 28/7/2026	C	Waste classification reports were sighted for wastes imported from development sites, and for spoil beneficially reused and transported between SSTOM sites as described for **Condition E124**. Disposal dockets and Waste Classifications were provided on request and aligned with data recorded in the Material Tracking Register.
WATER				
E126	The CSSI must be designed and constructed so as to maintain the NSW Water Quality Objectives (NSW WQO) where they are being achieved as at the date of this approval, and contribute towards achievement of the NSW WQO over time where they are not being achieved as at the date of this approval, unless an EPL in force in respect of the CSSI contains different requirements in relation to the NSW WQO, in which case those requirements must be complied with.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 05.01, dated 25/2/2026 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 03, 12/12/2024 (SWMP, Appendix B) • SMWSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022 • SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/20222 • SSTOM Discharge Point Schedule, EPL 211807 • Email from PLM Senior Environmental Consultant to NSW EPA RE: EPL No. 21807 - Request for licence variation - Additional discharge points and premise map update, dated 8/8/2024 • SM-WSA SSTOM Off Airport Dewatering register 3/3/2026-30/7/2026 • EPL 21807 Monitoring Report February 2026 • EPL 21807 Monitoring Report March 2026 • EPL 21807 Monitoring Report April 2026 • EPL 21807 Monitoring Report May 2026 • EPL 21807 Monitoring Report June 2026 • ER Endorsement of Surface Water Quality Construction Monitoring Program Revision 4, dated 13/8/2025 • Sydney Metro WSA - SSTOM - Surface Water Construction Monitoring Report August 2025 (Rev 01), dated 7/11/2025 • PLM Dewatering and Water Reuse Permit, SMF, dated 2/6/2026	C	PLM maintains water quality objectives in accordance with **Condition E126** by conducting water quality monitoring, and analysing results, in accordance with the parameters and discharge criteria set out in a Water Discharge Impact Assessment (WDIA). Two WDIAs were reviewed, the first prepared by SEEC in July 2022 for the Sydney Metro Surface Civil & Alignment Works, and the 2nd prepared in November 2022 for the Off-airport Station Boxes and Tunnelling Works (SBT). The SSTOM surface water quality monitoring program (SWQMP) is set out in Section 6.12.1 and Appendix B of the Soil and Water Management Plan (SWMP). The SWQMP commits to monitoring water quality to ensure discharge from the construction impact area is "*in accordance with regulatory guidelines, ANZECC/NSW Water Quality Objectives (required by CoA E126), or EPL discharge criteria, and to confirm conclusions from the Water Pollution Discharge Impact Assessment (prepared to CoA E130) and to identify potential non-compliances and corrective actions*". Surface water monitoring is conducted at the seven locations set out in Section 5.1 of the SWQMP at the frequency stated in Section 5.2. Sampling parameters are outlined in Section 5.4. Updates to the SWQMP were endorsed by the ER on 13/8/2025 and involved changes to monitoring locations to monitor closer to SSTOM work areas. The total number of monitoring locations was reduced from 10 to 7 to remove locations where impact from SSTOM was not being measured effectively. Water quality trigger values are set out in Section 5.5 and Table 10. The project environmental values, based on ANZG 2018 and ANZECC guideline trigger values for the selected toxicants, are applied for the protection of 95 percent of species in slightly disturbed to moderately disturbed freshwater systems, and 99 percent species protection level for toxicants that bioaccumulate. For physical and chemical stressors, the ANZG 2018 guidelines are the same as the ANZECC 2000 and provide guideline trigger values for slightly disturbed ecosystems in lowland rivers in south-east Australia as shown in Table 10. It is noted that Surface water quality monitoring requirements from the EPL are undertaken in addition to the monitoring described in the SWQMP. The SSTOM Discharge Point Schedule under EPL 21807 includes discharge and monitoring points located at Aerotropolis (Sediment Basin & WTP), St Marys (WTP), Orchard Hills, Linewide South, and the SMF (Sediment Basins). In an email to NSW EPA on 8/8/2024 PLM confirmed "*The Discharge Impact Assessment (DIA), prepared by Strategic Environmental and Engineering Consulting (SEEC), on behalf of the SCAW contractor has been reviewed to ensure it remains appropriate and applicable to the Parklife Metro SSTOM package of works. The DIA assessed discharge to both Cosgroves Creek (proposed EPL Point 5) and Blaxland Creek (Proposed EPL Point 6) and the detention volume proposed in the variation request remains consistent with the DIA. The sediment basins will be managed, maintained and operated by Parklife Metro in a manner consistent with the DIA*". An Annual Construction Monitoring Report is required to be prepared under the SWMP. The first Surface Water Quality Construction Monitoring Report (SWQMR) for SSTOM covered the period from commencement of Construction on 8/8/2023 to 8/8/2024. The 2nd SWQMR (August 2025) covered the period from August 2024 to July 2025. During the reporting period, three quarterly and four wet weather monitoring events were completed. Exceedances in water quality parameters were observed but upon investigation were not considered to be attributable to SSTOM. As outlined in the EIS and Soil and Water Management Plan, the existing water quality in the project corridor was considered poor due to the increasing urbanisation and vegetation clearance, largely influenced by point source water pollution (e.g., from stormwater drains, effluent) and diffuse water pollution (e.g., market gardens, cattle and sheep grazing, intensive agriculture such as poultry farming). Golf courses, industrial premises and developments in close proximity to sampling locations were also identified as a potential source of exceedances particularly for high nutrient and turbidity results near St Marys, Luddenham and Bradfield sites. EPL 21807 Monitoring Reports from February-June 2026 were reviewed. Surface water monitoring requirements are set out in Section 3.3 and Appendix D and described compliance with the EPL Condition E2.1 monitoring frequency. The discharge of water from sediment basins occurred at SMF-012, BRD AEC3, BSF CH37300 (south), Linewide P1 (SSTOM-013) & LDN during March-July 2026 and compliance with discharge criteria from the EPL Condition L2.4 is discussed. Discharge permits and water quality criteria during discharge are recorded in Appendix C of the EPL Monitoring Reports and appeared to be compliant. The Off Airport Dewatering register, and examples of dewatering permits were also sighted and provide further evidence of compliance with water discharge requirements. According to the register there were 17 discharge events to EPL discharge points from 3/3/2026-30/7/2026.

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
Construction Requirements				
E127	The Proponent must consider the Guidelines for controlled activities on waterfront land Riparian corridors (Department of Industry 2018) when carrying out work within 40 metres of a watercourse, including its bed.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection 3/8/2026 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 05.01, dated 25/2/2026 • SMWSA SSTOM Linewide Portion 3, Luddenham Road South to Elizabeth Drive Erosion and Sediment Control Plan Rev03, dated 30/1/2026 • EWMS 005 - Works adjacent to or in Waterways_Rev2, dated 21/8/2025 • Letter from DPIRD Fisheries to PLM RE: Consultation - Proposed works in waterways and temporary water crossings - Cosgrove Creek, Blaxland Creek and two unnamed waterways - SMWSA Project, dated 24/10/2025 • Water Quality Monitoring Results, Blaxland Creek (Upstream & Downstream), Jan-July 2026	**C**	Section 6.5 of the SWMP sets out requirements for works in waterways and temporary waterway crossings. The SSTOM SWMP commits to undertaking work in and around waterways (within 40m), including in the main creek channels (at Blaxland Creek, unnamed watercourse south of Patons Lane and Cosgrove Creek) in accordance with the Guidelines for controlled activities on waterfront land riparian corridors (Department of Industry 2018). *"Works will be scheduled in waterways during periods of predicted low flow to minimise impacts and will be avoided during rainfall events. Where possible, existing creek bed material will be reclaimed and re-used in the reconstruction or stabilisation of creeks. Disturbed creeks will be progressively stabilised to avoid potential scouring and sedimentation with permanent stabilisation measures implemented as soon as practicable". "Temporary waterway crossings, if required, will be designed, constructed, and maintained, consistent with the Blue Book, the Fish Passage Requirements for Waterway Crossings and Policy (2003) and Guidelines for Fish Friendly Waterway Crossings (2003). This design process will be completed in consultation with DPI Fisheries to minimise impacts on natural flow regimes and to not present any barriers. Temporary waterway crossings will be designed by a suitably qualified and experienced person and will incorporate suitable hard, durable material that will avoid erosion of fine particles into waterways or siltation of waterways". "Erosion and sediment controls will be implemented at the entry and exits points of temporary waterway crossings and will be included in the progressive ESCPs. The progressive ESCPs will document that works within the main creek channels will be avoided during and immediately following rainfall events, unless necessary in an emergency to avoid property damage or prevent the loss of life".* Works within 40m of a watercourse were ongoing during the IA6 audit period including creek crossings at Cosgrove Creek (Linewide Portion 3) and Blaxland Creek (Linewide Portion 1). An Environmental Work Method Statement (EWMS) was prepared for creek crossings and consultation undertaken with DPIRD Fisheries. The EWMS and consultation provide evidence of minimisation of impacts to Key Fish Habitat (KFH) and demonstrated the planning in place for the design and placement of controls to reduce potential impacts to water quality during the work. All controls were in place during the audit site inspection and auditees advised water quality monitoring records indicate no negative impact to water quality as a result of the project. Monthly water quality monitoring records were sighted for Blaxland Creek from Jan-July 2026. Results for NTU and pH up & downstream were comparable and no visible oil & grease was recorded.
E128	Before undertaking any work and during maintenance or construction activities, erosion and sediment controls must be implemented and maintained to prevent water pollution consistent with Managing Urban Stormwater: Soils and Construction Vol 1 4th ed. by Landcom, 2004 (The Blue Book).	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection 3/8/2026 • SMWSA SSTOM, Erosion and Sediment Control Plan (ESCP), Linewide Portion 4, Rev05, dated 11/5/2026 • SMWSA SSTOM, Erosion and Sediment Control Plan (ESCP), Linewide North, Rev12, dated 27/7/2026 • SMWSA SSTOM, Erosion and Sediment Control Plan (ESCP), Linewide Portion 1, Rev07, dated 2/4/2024 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills Station Rev17, dated 13/7/2025	**C**	Progressive Erosion and Sediment Control Plans (PESCPs) were provided for review for Linewide Portions 1 & 4, Linewide North (Luddenham Station to Orchard Hills), and Orchard Hills Station which are updated on a progressive basis to reflect the current stage of construction. The PESCPs were adequately detailed and appeared to reflect conditions observed on site at the time of the audit.
E129	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from construction wastewater treatment plants to surface waters must not exceed: (a) the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018 (ANZG (2018)) default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000 (ANZECC/ARMCANZ); and (c) for bio accumulative and persistent toxicants, the ANZG (2018) guidelines values at a minimum of 99 per cent species protection level. Where the ANZG (2018) does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG (2018) for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, Conditions P1, O4.7, M2.1, M2.3, M3.1, R3.3, E2, E3 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 05.01, dated 25/2/2026 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 03, 12/12/2024 (SWMP, Appendix B) • SMWSA NSW (Off-airport) Wastewater Discharge Impact Assessment (WDIA), Station Boxes and Tunnelling Works (SBT), RevA.02, dated 17/11/2022 • SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022 • SSTOM Discharge Point Schedule, EPL 211807 • Email from PLM Senior Environmental Consultant to NSW EPA RE: EPL No. 21807 - Request for licence variation - Additional discharge points and premise map update, dated 8/8/2024 • SM-WSA SSTOM Off Airport Dewatering register 19/8/2025-5/2/2026 • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53206 (St Marys), dated 5/12/2023 • Sydney Water Consent to Discharge Industrial Trade Wastewater (TWA), Consent No. 53823 (Claremont Meadows), dated 8/1/2025	**NT**	The SSTOM Discharge Point Schedule under EPL 21807 (Condition P1.1) includes discharge and monitoring points located at Water Treatment Plants (WTPs) at St Marys (discharging to South Creek), and Bradfield Station (discharging to Thompson Creek). Requirements to monitor the concentration of pollutants discharged is set out in the EPL, Condition M2. WTP at Bradfield Station was decommissioned in January 2025. A new WTP has been set up at the Claremont Meadows Service Facility. It is understood there are no current discharges from WTPs to surface waters for SSTOM. Water Treatment Plants (WTP) were operational at the St Marys Station and Claremont Meadows Service Facility at the time of IA5 and treat surface water runoff that accumulates across the hardstand, and groundwater from station boxes and tunnels, discharging to sewer in accordance with Trade Waste Agreements with Sydney Water.

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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
E130	If construction stage stormwater discharges are proposed, a **Water Pollution Impact Assessment** will be required. Any such assessment must be prepared in consultation with the EPA and be consistent with the National Water Quality Guidelines, with a level of detail commensurate with the potential water pollution risk. ***Note:*** *If an EPL is required the* ***Water Pollution Impact Assessment*** *will be required to inform licensing consistent with section 45 of the POEO Act.*	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8//2026 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 05.01, dated 25/2/2026 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 04, 13/8/2025 (SWMP, Appendix B) • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807 • SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022 • Construction Water Discharge Impact Assessment – Stabling Yard and Maintenance Facility (SMF), Tetra Tech Coffey, dated 7/7/2026	**C**	Construction stage stormwater discharges occur for SSTOM sites at Bradfield Station, SMF, Orchard Hills, Linewide and Bringelly. A Water Discharge Impact Assessment (WDIA) was prepared by Strategic Environmental and Engineering Consulting (SEEC), on behalf of the SCAW contractor has been reviewed to ensure it remains appropriate and applicable to the Parklife Metro SSTOM package of works. The DIA assessed discharge to both Cosgrove Creek (proposed EPL Point 5) and Blaxland Creek (Proposed EPL Point 6) and the detention volume proposed in the variation request remains consistent with the DIA. The sediment basins will be managed, maintained and operated by Parklife Metro in a manner consistent with the DIA. The WDIA set turbidity discharge limits for discharges to various waterways but concluded that despite this discharge impact assessment indicating that the local waterways can cater for construction basin discharges between 59 NTU and 73 NTU, a conservative discharge limit of 50 NTU was recommended for discharge to all waterways. Based on modelling in the assessment, turbidity in all waterways already naturally exceeds 50 NTU during and after heavy rainfall events, and this is expected to continue to occur during construction. The SSTOM Surface Water Quality Monitoring Program continues to be implemented to provide assurance that discharges comply with discharge criteria. During the IA6 audit period groundwater was encountered during excavation for the drainage network under the SMF stabling yard. To date the water has been used for dust suppression and auditees confirmed no discharge to water has occurred. Interim groundwater management measures have been implemented to prevent off-site discharge of groundwater-affected water during construction. These measures currently include: • temporary blocking of sections of the stormwater drainage network to increase onsite holding capacity; • installation of an additional groundwater sump; • reuse of captured water for dust suppression where suitable; • tanker transfer and off-site disposal of excess groundwater-affected water where required. A WDIA was prepared to "*assess potential impacts associated with construction-phase stormwater and groundwater-affected water management within the SMF drainage system, including potential discharge to Blaxland Creek and the broader South Creek catchment*". The WDIA was undergoing review by the EPA at the time of IA6 and aims to determine discharge criteria groundwater to Blaxland Creek, utilising the sediment basin as a mixing zone to determine whether water quality parameters can be brought within compliant levels. "*During construction activities, groundwater ingress has been observed within parts of the western SMF stormwater drainage network. Indicators consistent with groundwater influence include:* • *elevated electrical conductivity (EC) and total dissolved solids (TDS);* • *reducing redox conditions;* • *elevated nutrients and dissolved metals;* • *rapid recharge within portions of the western drainage network during dry-weather conditions;* • *and sulfidic odours consistent with reducing groundwater conditions within shale-derived environments.* *Monitoring undertaken between October 2025 and April 2026 identified spatial variability in groundwater influence across the site. Elevated salinity and associated groundwater signatures have predominantly been identified within the western drainage corridor, including GPT-West and associated upstream drainage structures, while GPT-East has generally not exhibited comparable groundwater characteristics*". A separate operational-phase WDIA is proposed to assess long-term stormwater discharge conditions associated with the permanent operational drainage configuration of the SMF.
E131	Drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) and drainage swales and depressions must be carried out in accordance with relevant guidelines and designed by a suitably qualified and experienced person.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • Site inspection, 3/8/2026 • Soil and Water Management Sub Plan (SWMP), SSTOM, Rev 05.01, dated 25/2/2026 • Surface Water Quality Monitoring Program (WQMP), SSTOM, Rev 04, 12/8/2025 (SWMP, Appendix B) • ParkLife Metro (WEBUILD S.P.A) Environment Protection Licence No. 21807, L5.3 • SEEC Construction Discharge Impact Assessment, Sydney Metro Surface Civil & Alignment Works, Rev01, dated 13/7/2022 • Design extract Bridge Cosgrove Creek, Arup, dated 22.5.2024 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Portion 3 Luddenham Road South to Elizabeth Drive, Rev03, dated 30/1/2026 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), SMF, Rev12, dated 23/1/2026 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Luddenham Station, Rev05, dated 19/12/2025 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Bradfield Station, RevF, dated 6/7/2025 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Bringelly, Rev08, dated 20/1/2026 • SMWSA SSTOM, Erosion and Sediment Control Plan (ESCP), Linewide Portion 4, Rev05, dated 11/5/2026 • SMWSA SSTOM, Erosion and Sediment Control Plan (ESCP), Linewide North, Rev12, dated 27/7/2026 • SMWSA SSTOM, Erosion and Sediment Control Plan (ESCP), Linewide Portion 1, Rev07, dated 2/4/2024 • SMWSA SSTOM, Progressive Erosion and Sediment Control Plan (PESCP), Orchard Hills Station Rev17, dated 13/7/2025 • EWMS 005 - Works adjacent to or in Waterways_Rev2, dated 21/8/2025 • Letter from DPIRD Fisheries to PLM RE: Consultation - Proposed works in waterways and temporary water crossings - Cosgrove Creek, Blaxland Creek and two unnamed waterways - SMWSA Project, dated 24/10/2025	**C**	Section 6.5 of the SWMP sets out requirements for works in waterways and temporary waterway crossings. The SSTOM SWMP commits to undertaking work in and around waterways (within 40m), including in the main creek channels (at Blaxland Creek, unnamed watercourse south of Patons Lane and Cosgroves Creek) in accordance with the Guidelines for controlled activities on waterfront land riparian corridors (Department of Industry 2018). *"Works will be scheduled in waterways during periods of predicted low flow to minimise impacts and will be avoided during rainfall events. Where possible, existing creek bed material will be reclaimed and re-used in the reconstruction or stabilisation of creeks. Disturbed creeks will be progressively stabilised to avoid potential scouring and sedimentation with permanent stabilisation measures implemented as soon as practicable. Temporary waterway crossings, if required, will be designed, constructed, and maintained, consistent with the Blue Book, the Fish Passage Requirements for Waterway Crossings and Policy (2003) and Guidelines for Fish Friendly Waterway Crossings (2003). This design process will be completed in consultation with DPI Fisheries to minimise impacts on natural flow regimes and to not present any barriers. Temporary waterway crossings will be designed by a suitably qualified and experienced person and will incorporate suitable hard, durable material that will avoid erosion of fine particles into waterways or siltation of waterways.* *Erosion and sediment controls will be implemented at the entry and exits points of temporary waterway crossings and will be included in the progressive ESCPs. The progressive ESCPs will document that works within the main creek channels will be avoided during and immediately following rainfall events, unless necessary in an emergency to avoid property damage or prevent the loss of life".* PESCPs were prepared for each site and identify the location of drainage swales at each SSTOM project site. PESCPs have been prepared by Certified Professionals in Erosion and Sediment Control (CPESCs), as identified on each PESCP. Works within 40m of a watercourse were ongoing during the IA6 audit period including creek crossings at Cosgrove Creek (Linewide Portion 3) and Blaxland Creek (Linewide Portion 1). An Environmental Work Method Statement (EWMS) was prepared for creek crossings and consultation undertaken with DPIRD Fisheries. The EWMS and consultation provide evidence of minimisation of impacts to Key Fish Habitat (KFH) and demonstrated the planning in place for the design and placement of controls to reduce potential impacts to water quality during the work. All controls were in place during the audit site inspection and water quality monitoring records indicate no negative impact to water quality as a result of the project. *NB: Morasey are engaged as environmental auditors and cannot verify whether design and construction is being undertaken on accordance with relevant guidelines.*
Operational Requirements				

Item	
Project Name:	SSI 10051 Sydney Metro Western Sydney Airport
Auditee/ Client:	ParkLife Metro / Sydney Metro
Auditor:	Jo Heltborg, Morasey Environment Pty Ltd
Audit Details:	Stations, Systems, Trains, Operations and Maintenance (SSTOM)
Project No.	MESYM 2024105-05 Sydney Metro_IEA5_WSA_SSTOM_August 2026

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

Condition	Requirement	Evidence	Compliance Status	Audit Findings & Recommendations
A132	Unless an EPL is in force in respect to the CSSI and that licence specifies alternative criteria, discharges from operational water treatment plants to surface waters must not exceed: (a) the ANZG 2018 default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC/ARMCANZ, 2000); and (c) for bio accumulative and persistent toxicants, the ANZG 2018 guideline values at a minimum of 99 per cent species protection level. Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026	NT	There are no operational WTPs in place for SSTOM.
Groundwater				
E133	Make good provisions for groundwater users must be provided in the event of a material decline in water supply levels, quality or quantity from registered existing bores associated with groundwater changes from either construction and/or ongoing operational dewatering caused by the CSSI.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM SWMP, Rev 05.01, 17/2/2026, includes: • Surface Water Monitoring Program, dated 12/8/2025 • Groundwater Monitoring Program, dated January 2026 • Groundwater Management Procedure, dated 3/10/2024 • Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report 4 July 2025-Feb 2026 Rev00, dated 30/4/2026	NT	Groundwater dependent ecosystems (GDE) at or near: • Claremont Meadows within residual soils. • Orchard Hills within alluvium. • Bradfield within alluvium.. Groundwater CMRs include information on compliance with **Condition E133** in relation to the potential effects on water supply levels, quality or quantity from registered existing bores. Groundwater levels are reported in Section 6.1 of the Groundwater CMR. Groundwater Construction Monitoring Report 4 July 2025-Feb 2026 reported "*Groundwater level triggers based on predicted post-excavation conditions (as outlined in PLM, 2024) were not exceeded at any monitoring locations (wells and VWPs) during this GME, with the exception of SBT-GW3006-R. At St Marys, groundwater levels at two locations to the south of the station box (GW-1001 & GW-1005) were above the trigger levels, indicating no management measures are required. The continuation of monitoring is recommended until the station box is hydrostatically tanked and the risk of groundwater drawdown is removed*".
E134	The Proponent must submit a revised **Groundwater Modelling Report** to the Planning Secretary for information before bulk excavation at the relevant construction location. The **Groundwater Modelling Report** must include: (a) for each construction site where excavation will be undertaken, cumulative (additive) impacts from nearby developments, parallel transport projects and nearby excavation associated with the CSSI; (b) predicted incidental groundwater take (dewatering) including cumulative project effects; (c) potential impacts of the CSSI or detail and demonstrate why the CSSI will not have lasting impacts to the groundwater system, ongoing groundwater incidental take and groundwater level drawdown effects; (d) actions required to minimise the risk of inflows (including in the event the CSSI are delayed or do not progress) and a strategy for accounting for any water taken beyond the life of the operation of the CSSI; (e) saltwater intrusion modelling analysis, from saline groundwater in shale, into metro station sites; and (f) a schematic of the conceptual hydrogeological model.	• Interview with Sydney Metro & ParkLife Metro, 5/8/2026 • SSTOM SWMP, Rev 05.01, 17/2/2026, includes: • Surface Water Monitoring Program, dated 12/8/2025 • Groundwater Monitoring Program, dated January 2026 • Groundwater Management Procedure, dated 3/10/2024 • Sydney Metro WSA - SSTOM - Groundwater Construction Monitoring Report 4 July 2025-Feb 2026 Rev00, dated 30/4/2026	NT	The project has interpreted that **Condition E134** is "*principally tailored to the bulk earthworks contractor and, in particular, the SBT scope, with the requirements referring to groundwater drawdown associated with station sites and excavation activities such as station box excavations and tunnelling*". PLM advised there has been no bulk excavation or tunnelling conducted as part of their scope of works, and the condition requires a groundwater modelling report to be submitted prior to the commencement of bulk earthworks. It is understood that Sydney Metro and PLM have discussed the intent of **Condition E134** and determined that an additional Groundwater Modelling Report is not required for the PLM scope. The identification of saline groundwater at the SMF during the IA6 audit period has not changed the above position held by PLM and Sydney Metro. PLM advised "*The groundwater encountered within the PLM surface works area at SMF is being managed under **Condition E130**, which addresses the management of groundwater encountered during construction. The groundwater interface and associated water quality considerations are also being actively managed through the Water Discharge Impact Assessment (WDIA) process. Sydney Metro and the EPA were notified of the saline groundwater issue, and the EPA is actively involved in the ongoing WDIA process. The WDIA is considering the groundwater/water quality characteristics and the proposed management and discharge arrangements associated with the SMF, including the relevant water quality risks*".

Independent Environmental Audit Report

Sydney Metro

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

Attachment 2: Planning Secretary Appointment of Experts

Department of Planning, Housing and Infrastructure

Reference: SSI-10051-PA-740

Sydney Metro
Level 43
680 George Street
Sydney NSW 2000
Attention: [redacted], A/ Senior Manager, Environment, Western Sydney Airport
08/07/2026

Sent via the Major Projects Portal only

Subject: Sydney Metro - Western Sydney Airport - Auditor nomination A38

Dear [redacted],

I refer to your submission lodged via the Major Projects Portal on 11 June 2026 (SSI-10051-PA-740), requesting the Planning Secretary's agreement to suitably qualified, experienced, and independent persons to conduct the 10th combined Independent Environmental Audit of CSSI-10051, as modified, Sydney Metro Western Sydney Airport (**Approval**).

The NSW Department of Planning, Housing and Infrastructure (**Department**) has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition A38 of the Approval and the NSW Planning, Independent Audit Post Approval Requirements (2020) (**IAPAR**), as nominee of the Planning Secretary, I endorse the following independent auditor for the upcoming Independent Environmental Audit:

- Josephine (Jo) Heltborg, as lead auditor

Please ensure that this correspondence is appended to the Independent Environmental Audit.

Please note that any subsequent independent audits of the project, under the conditions of approval, require a new auditor nomination and written approval from the Planning Secretary prior to commencement.

The Department reserves the right to request an alternate auditor or audit team for future audits.

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

Noting previous correspondence for reference, the 2026 Independent Audit Post Approval Requirements (**2026 IAPAR**) have now been released are in effect. They can be accessed here: *Independent Audit Post Approval Requirements*.

Should you wish to discuss the matter further, please contact Sarah Cavaleri, (Senior Compliance Officer) on [redacted] or email compliance@dphi.nsw.gov.au

Yours sincerely

[redacted]

Gabriel Abi-Saab
Team Leader Compliance - Metro Rail Compliance

As nominee of the Planning Secretary

Independent Environmental Audit Report

Sydney Metro

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

Attachment 3: Independent Audit Declaration Form

Independent Audit Report Declaration Form

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

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

Attachment 4: Consultation Records

Jo Heltborg

From: Jo Heltborg
Sent: Thursday, 9 July 2026 4:55 PM
To: DPE PSVC Compliance Mailbox
Subject: Independent Audit 10 - SSI-10051 Sydney Metro Western Sydney Airport - SSTOM & FAW - Consultation
Attachments: Appointment of Experts_08072026_034046.pdf

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 10th 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 **3rd August 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 site inspection for the 10th SSTOM audit are in the southern portion of the project and include:

- Linewide Portion 1
- Linewide Portion 4
- Orchard Hills Station

- Claremont Meadows Service Facility
- St Mary's Station

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 February 2026).

We look forward to hearing from you before **Thursday 23rd July 2026**.

Kind regards,

Josephine Heltborg
Principal Environmental Auditor
Morasey Environment Pty Ltd
M: [redacted]
W: www.morasey.com.au



Jo Heltborg

From: Jo Heltborg
Sent: Thursday, 9 July 2026 5:01 PM
To: 'info@epa.nsw.gov.au'
Subject: Independent Audit 10 - 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 10th 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 **3rd August 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 EPA confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **Thursday 23rd July 2026**.

Kind regards,

Our ref: DOC26/387293-1

Josephine Heltborg
Principal Environmental Auditor
Morasey Environment Pty Ltd

14 July 2026

By email: jo@morasey.com.au

Dear Ms Heltborg

Re: Consultation on the 10th 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 9 July 2026 regarding your engagement by Sydney Metro as the independent auditor for the Sydney Metro Western Sydney Airport (WSA) project (SSI-10051, as modified) 10th 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 ed. by Landcom, 2004 (The Blue Book).
- Actual impacts compared to predicted impacts documented in the environmental impact assessment – impacts to surface waters.
- Condition E134 – Groundwater Modelling Report – whether saline groundwater intersection at the Stabling and Maintenance Facility site has been updated in the Groundwater Modelling Report.

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

Kind regards

A/Manager Regulatory Operations
NSW Environment protection Authority

Jo Heltborg

From: Jo Heltborg
Sent: Thursday, 9 July 2026 4:59 PM
To: 'lcc@liverpool.nsw.gov.au'
Subject: Independent Audit 10 - 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 Liverpool City Council (LCC) on the scope of the 10th 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 **3rd August 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 **Thursday 23rd July 2026**.

Kind regards,

Jo Heltborg

From: Jo Heltborg
Sent: Thursday, 9 July 2026 4:57 PM
To: 'council@penrith.city'
Subject: Independent Audit 10 - 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 Penrith City Council on the scope of the 10th 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 **3rd August 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 PCC confirm any key issues it would like examined, relating to post-approval requirements and compliance.

We look forward to hearing from you before **Thursday 23rd July 2026**.

Kind regards,