

SM – WSA CSSI 10051

Sydney Metro Response to Combined Independent Environmental Audit No.10 Findings

Item	Ref	Type	Requirement	Finding	Recommended or completed action ¹	By Whom	Status ² & Due Date	Sydney Metro Response
NON-COMPLIANCES								
IA6 – NC01	C10	Non-Compliance (self-reported)	Construction must not commence until the CEMP and all CEMP Subplans 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.	SSTOM (PLM)	CLOSED Due Date: N/A	N/A
IA6-NC02		Non-Compliance (self-reported)		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.	The NC was discussed during the audit and the auditor was satisfied that appropriate actions had been closed-out internally.	SSTOM (PLM)	CLOSED Due Date: N/A	N/A
IA10-NC001	E57	Non-Compliance (self-reported)	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 <i>"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."</i> The draft E57 report was sent to the ER on the	The actions raised and closed-out by the Proponent and Contractor were assessed during the audit. No further actions or recommendations are considered necessary.	FSM (LORAC)	CLOSED Due Date: N/A	N/A

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				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.				
OBSERVATIONS								
IA06-OBS01	C22	Observation	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.	SSTOM (PLM)	OPEN Due Date: To be verified during IA7	The Noise and Vibration Construction Monitoring Reports (CMRs) have been prepared and issued on a six-monthly basis. The current Construction Monitoring Program does not clearly specify a submission timeframe for these reports and notes that monitoring reports are to be provided to the EPA upon request. To address this ambiguity, the Construction Monitoring Program will be updated to clarify that Noise and Vibration CMRs are to cover six-month monitoring periods and will be submitted to the relevant regulatory agencies upon completion. Future reports will continue to be provided to the EPA and relevant councils as soon as practicable following preparation and finalisation.
IA06-OBS02	E58	Observation	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.	SSTOM (PLM)	CLOSED Due Date: N/A	N/A
IA10-OBS01	C10	Observation	Construction must not commence until the CEMP and all CEMP Subplans have been approved by the Planning Secretary or	Non-compatible storage of hazardous chemicals (Flammable Liquids stored in a	Remove Flammable Gases (aerosols) from the Flammable Liquid cabinet and	FSM (LORAC)	OPEN Due Date: 14.09.2026	Flammable gasses were removed from the flammable liquid cabinet and placed in the flammable gas cage. All supply

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			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.	cabinet with Flammable Gases) was identified in the LOR site compound.	store in a designated, ventilated Flammable Gas cage.			chain partners were briefed on proper chemical storage and management of items bought and stored on site.
IA10–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.	FSM (LORAC)	OPEN Due Date: 14.09.2026	The area was compacted and ballast applied to stabilise the area.
IA10–OBS03	E41	Observation	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.	FSM (LORAC)	OPEN Due Date: TBA by LORAC	Fieldview is not being used on future LOR projects. Only one defect possession remains for the FSM project in December 2026. The excel noise monitoring spreadsheet will be utilised like with past possessions.