

Katrina O'Reilly
Team Leader – Compliance
Department of Planning, Infrastructure and Environment
12 Darcy Street
Paramatta, NSW, 2150

Email: katrin.oreilly@planinng.nsw.gov.au

To Katrina O'Reilly,

**CSSI 7474 NARRABRI TO NORTH STAR, PHASE 1 (N2NS) PROJECT
Independent Environmental Audit and Response to Findings
Minister's Condition of Approval A39**

I refer to the Ministers Conditions of Approval (MCoA's) issued for the Critical State Significant Infrastructure (CSSI) Project No 7474 Narrabri to North Star, Phase 1 on 13 August 2020 (**N2NS Planning Approval**), and specifically the requirement to submit Independent Audit Reports and the Proponents response to the audit findings to the Planning Secretary within 2 months of undertaking the audit in accordance with **MCoA A39**.

Following the first Independent Environmental Audit site inspection on 2-13 July 2021, I am now pleased to be able to submit to you the first Independent Environmental Audit report for the NSNS Phase 1 project. Please also refer to Attachment 1 – Response to Audit Findings which outlines the proposed actions and / or current compliance status against the identified potential Non-compliance findings and suggested Opportunities for Improvement.

If you wish to discuss any of the above further, have any comments or concerns, please either contact Justin Bate, Health, Safety and Environment Superintendent on JBate@artc.com.au or 0438 952 286 or myself on PBorrelli@artc.com.au or 0407 254 363.

Yours sincerely

Peter Borrelli
ARTC Project Director N2NS
22 November 2021

Attachment 1 – Response to Audit Findings

Response to Audit Findings

Table 1 - Identified Non-Compliance Findings

Condition Reference	Requirement	Independent Audit Finding	Recommendation Status	Action / Status
A1	The CSSI may only be carried out in accordance with the terms of this approval and generally in accordance with the description of the CSSI in the Inland Rail – Narrabri to North Star Environmental Impact Statement, Volumes 1-7 (prepared by GHD and dated November 2017), the Inland Rail – Narrabri to North Star Submissions Preferred Infrastructure Report (ARTC, dated December 2019) and (updated BDAR, RtS on the SPIR and RFI responses).	<p>The SEMP was prepared to support pre-construction activities associated with the delivery of the project. The CEMP replaced the SEMP as the key environmental management document for the construction of the project.</p> <p>The SEMP and CEMP provides a management framework to comply with condition A1 and condition A2 that require the N2NS Phase 1 project to be constructed generally in accordance with the description of the project in the SPIR, Environmental Impact Statement (EIS) and the N2NS Phase 1 Conditions of Approval and in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in these documents unless otherwise specified in, or required under, the CoAs. Minor ancillary facilities process being updated within the CEMP (refer s4.1). SEMP no longer in use. Refer to C2.</p> <p>A number of non-compliance were identified during the audit period including:</p> <ul style="list-style-type: none"> • A2 – CSSI Compliance • A21 – Minor Ancillary Facilities • E28 – Flood Design Verification Report • E29 – Independent Peer Review • E30 – Flood Emergency Response Plan (FERP) for Flood Risks within the Rail Corridor • E31 – Information to Facilitate Management of Flood Emergency Risks beyond the Rail Corridor • E71 – Aboriginal Heritage • E80 – Erosion and sediment controls <p>Refer to the specific IEA comments and evidence for each noncompliant condition listed above.</p> <p>Evidence: SEMP Rev E 21/02/2021, CEMP rev E 04/02/2021</p>	No recommendation required for non-compliance. Refer to the specific IEA comments, evidence, and recommendations for each non-compliant condition.	Refer responses to specific MCoA.
A2	The CSSI must be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in in the documents listed in Condition A1 unless otherwise specified in, or required under, this approval.	Noted, as above.	As above.	As above.
A21	<p>Minor Ancillary Facilities</p> <p>Facilities including lunch sheds, office sheds, material lay down sites, stockpile areas, areas used to assemble infrastructure, and portable toilet facilities can be established and operated where they satisfy the following criteria:</p> <p>(a) are located within the construction boundary; and</p>	<p>The minor ancillary facilities were observed within the construction boundary for each work area. Evidence of completed minor ancillary facility checklists were observed on site assessed by the ER.</p> <p>The establishment of the MAF at Waterloo Road, Gurley, prior to obtaining ER approval under CoA A21 is considered to be a non-compliance with that condition.</p>	<p>It is recommended that the CEMP be updated to reflect the use of a rapid assessment form for minor ancillary facilities.</p> <p>Review the management of lime loading facilities to minimise traffic of lime outside the MAF, or onto public roadways. This may include the use of additional loading controls to minimise spillage during loading and installation of shaker grids or rock crossings to reduce potential for tracking lime out of these areas. Provide training for operators in</p>	<p>It is noted that under MCoA A21 that the ER is required to 'assess' the MAF against the criteria, not to provide 'approval'. However, the ER's assessment was not sought prior to establishment of the MAF at Waterloo Road, Gurley.</p> <p>The MAF assessment process is contained in the Site Establishment Management Plan (SEMP). Trans4M Rail will include the ER</p>

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	<p>(b) have been assessed by the ER to have –</p> <ul style="list-style-type: none"> i. low amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and ii. low 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. 	<p>The ER has approved the use of a rapid assessment form for minor ancillary facilities. This process, while approved by the ER is not reflected in the CEMP.</p> <p>During the site inspection of Pad 4, spillage of lime was observed at loading points and tracked onto the adjacent public roadways. During the inspection of Pad 4, storage of hydraulic fluid containers and IBC's were situated in the yard without appropriate bunding.</p> <p>At the Gurley Culverts site and Tycannah Tributary sites, fuel cans were observed located immediately adjacent to watercourses. These containers should be stored in appropriately bunded locations.</p>	<p>the use of control measures to minimise the spilling and tracking of lime.</p> <p>Ensure that liquids are stored in appropriately bunded areas. Refuelling should not occur within the catchment of watercourses to reduce the risk of spills.</p>	<p>endorsed MAF rapid assessment process in the next CEMP (Rev 1) update.</p>
E28	<p>Flood Design Verification Report</p> <p>Compliance with the QDLs as required by Condition E27 must be demonstrated in a Flood Design Verification Report that details flood behaviour under existing conditions and with the final detailed design of the approved CSSI. The flood modelling informing the report must be developed in consultation with EES, relevant councils and Transport for NSW, and completed to the specifications in Appendix A – FLOODING QUANTITATIVE DESIGN LIMITS AND MODELLING REQUIREMENTS. The Flood Design Verification Report must include:</p> <ul style="list-style-type: none"> (a) details of the flood modelling that informs the report; (b) details of how the project's flood planning level (FPL) was decided, with reference to relevant considerations of the NSW Floodplain Development Manual; (c) an assessment of the infrastructure's compliance with the Quantitative Design Limits (QDLs) for flooding, hydrology and geomorphology listed in Appendix A – FLOODING QUANTITATIVE DESIGN LIMITS AND MODELLING REQUIREMENTS; (d) floor level surveys of potentially affected buildings to accurately confirm compliance with afflux limits. Where a floor level has not been surveyed, the Report shall adopt the existing ground level as the floor level, with appropriate annotation; (e) an assessment of the impacts of the CSSI on erosion, scouring, bank stability, stream stability and geomorphology; (f) mitigation and management measures that will be undertaken if the QDLs are exceeded, as specified in Condition E27; 	<p>The Flood Design Verification Report is currently being prepared. The assessment and management of scenarios whereby QDL's cannot be complied with will be able to be properly reviewed when this report has been completed.</p> <p>The N2NS Phase 1 project commenced construction of permanent works that may impact flooding prior to the audit. The delay in preparing the FDVR has meant that independent peer review of the report and results has not been completed and submitted to the secretary at least one month prior to the commencement of construction as required.</p>	<p>Ensure the Flood Design Verification Report is finalised and submitted to the Secretary as per the condition.</p>	<p>The Flood Design Verification Report (MCoA E28), the accompanying Independent Peer Review (MCoA E29), the Flood Emergency Response Plan (MCoA E30) and documentation relating to the management of flood emergency risks beyond the rail corridor (MCoA E31), have been provided to the Planning Secretary for information. These pieces of information were electronically transferred to the Department on 25 August 2021, via ARTC's document control and distribution system (refer to Mail Number IR2600-TRANSMIT-000984).</p>

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	<p>(g) mitigation measures to minimise potential adverse impacts and responses to actual impacts with regard to the NRAR's Guidelines for Controlled Activities on Waterfront Land;</p> <p>(h) an assessment of risk to life caused by formation failure in extreme flood events, including management measures to mitigate this risk; and</p> <p>(i) an assessment of aquaplaning risks where the CSSI produces additional inundation of highways or sealed roads with a speed limit of 80km/h or greater. Where an aquaplaning risk is attributable to the CSSI, undertake infrastructure changes to remove the additional inundation or to introduce risk mitigation measures to manage this risk.</p> <p>The flood model and results must be independently peer reviewed in accordance with Condition E29 and be submitted to the Planning Secretary for information at least one month prior to the commencement of construction of permanent works that may impact on flooding.</p> <p><i>Note: Components of the SPIR hydrology technical report that are still relevant to the final design of the CSSI may be reused to prepare the Flood Design Verification Report where they meet the requirements of Condition E28 and Appendix A</i></p>			
E29	<p>Independent Peer Review</p> <p>The Flood Design Verification Report (including the flood model upon which it is based) must be reviewed and endorsed by a suitably qualified and experienced hydrologist who has extensive experience in flood modelling including with the hydrological and hydraulic software used for the model. This hydrologist must be independent of the Proponent and the organisation(s) who prepared the flood model, having regard to the Department's Post Approval Guidance for Infrastructure Projects: Seeking Approval from the Department for the Appointment of Independent Experts (DPIE, 2020). The review must:</p> <p>(a) review the flood model files and the description of the model provided within SPIR and any adjustments to this as per the Flood Design Verification Report;</p> <p>(b) assess the establishment, calibration, validation and operation of the flood model items as per (a);</p> <p>(c) identify and document existing and future purposes for which the model can and cannot be used, including adaptation of this model by others, and any limitations on this;</p> <p>(d) document the review findings including specifically responding to Condition E28(a) to E28(i)</p>	<p>The Flood Design Verification Report is currently being prepared and will be provided for independent peer review on completion. The independent peer review required by this condition has not been completed and submitted to the secretary at least one month prior to the commencement of construction as required by condition E28.</p>	<p>Ensure the independent review is completed and submitted to the Secretary as per the condition.</p>	<p>As above.</p>

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	<p>and, after any recommended model and/or reporting improvements have been undertaken to the peer reviewer's satisfaction, provide written certification within the review report that the Flood Design Verification Report, modelling and mitigation measures:</p> <ul style="list-style-type: none"> i. have been prepared consistent with current and appropriate methodologies and standards; and ii. accurately depict and resolve design impacts of the CSSI. <p>The peer reviewer's endorsement must be appended to the Flood Design Verification Report.</p>			
E30	<p>Flood Emergency Response Plan (FERP) for Flood Risks within the Rail Corridor</p> <p>The Proponent must prepare a Flood Emergency Response Plan (FERP) which documents how the risks to life and property within the rail corridor are to be safely managed during a flood. The FERP must detail activities before, during and after a flood, including for staff training and maintenance and updating of the FERP.</p> <ul style="list-style-type: none"> (a) The FERP must be prepared by an experienced flood emergency response specialist who has extensive experience in preparation of these plans. b) This specialist must confirm that residual flood risks are acceptable and the procedures within the FERP are consistent with best practice and the requirements of the NSW Floodplain Development Manual. (c) The FERP must be appended to the Flood Design Verification Report. <p><i>Note: Nothing in this condition prevents the adaptation of an existing flood management or emergency plan to satisfy this condition.</i></p>	<p>A Flood Emergency Response Plan is currently being prepared and it will be included in the FDVR that is being prepared for delivery as mentioned above.</p> <p>The delay in preparing the FDVR has meant that independent peer review of the report and results has not been completed and submitted to the secretary at least one month prior to the commencement of construction as required by condition E28</p>	<p>Ensure the Flood Emergency Response Plan is finalised and submitted to the Secretary as per the condition.</p>	<p>As above.</p>
E31	<p>Information to Facilitate Management of Flood Emergency Risks beyond the Rail Corridor</p> <p>Where the CSSI has the potential to adversely impact flood risks to life or property beyond the rail corridor, the Proponent must document the flood risk information in sufficient detail so that relevant emergency services personnel and affected third parties can prepare, respond and recover from future flood emergencies. This shall include but not be limited to:</p> <ul style="list-style-type: none"> (a) documentation of the changes to flood behaviour including levels, depths, velocities, etc, that may result in adverse impacts to life and property beyond the rail corridor, in any future flood events including events up to the PMF; 	<p>Refer to above regarding status of FDVR and FERP.</p> <p>The delay in preparing the FDVR has meant that independent peer review of the report and results has not been completed and submitted to the secretary at least one month prior to the commencement of construction as required by condition E28.</p>	<p>Ensure the FDVR and FERP are finalised and submitted to the Secretary as per the condition and to allow for that independent peer review of the report and results to occur</p>	<p>As above.</p>

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	<p>(b) consideration of changes to flood behaviour that may result from CSSI infrastructure failures or embankment collapses where these may occur during floods;</p> <p>(c) provision of sufficient detail and scope to enable the relevant personnel or agency (including the NSW SES, the local council, affected property or infrastructure owners) to prepare for management of flood emergencies;</p> <p>(d) respond to requests for information about the CSSI from those personnel or agencies in (c) to assist them in preparing their own flood emergency response plans.</p> <p>This documentation shall be appended to the Flood Design Verification Report and be certified as consistent with the requirements of this condition by the same specialist preparing and certifying the FERP (required by Condition E30)</p>			
E71	<p>Prior to the commencement of any construction works within areas identified as requiring archaeological investigation by the methodology required by Condition E70 the Proponent must:</p> <p>(a) Undertake archaeological investigations; and</p> <p>(b) report on the results of the archaeological investigation, including, but not necessarily be limited to:</p> <p>i. consideration of measures to avoid or minimise disturbance to Aboriginal objects where objects of moderate to high archaeological or cultural significance are found to be present;</p> <p>ii. where impacts cannot be avoided, recommendations for any further investigations or salvage;</p> <p>iii. management and mitigation measures to ensure there are no additional impacts due to preconstruction and construction activities; and demonstration of additional consultation with the Registered Aboriginal Parties about items i) to iii).</p>	<p>The Aboriginal Cultural Heritage Management Plan Narrabri to North Star – Separable Portion 1 (N2NS Phase 1) prepared by Niche Environment and Heritage dated 18 December 2020 and Addendum Aboriginal Cultural Heritage Assessment Narrabri to North Star – Separable Portion 1 (N2NS Phase 1) prepared by Niche Environment and Heritage dated 1 December 2020 were submitted on 11 January 2021 detailing this methodology and consultation.</p> <p>At around 19th April 2021, disturbance was caused to an existing vehicle access track at the Gil Gil Creek site and geofabric with road base material was also placed over this area. Four artefacts were previously identified as being located within the vehicle access track for salvaging but were not salvaged prior to this disturbance. The likely cause of this incident was the failure to identify the location of the un-salvaged Aboriginal cultural heritage site NNS AS11 at the Gil Gil Creek site prior to ground disturbance being undertaken.</p> <p>At around 19th April 2021, disturbance was caused by a grader at the Bunna Creek South site. This affected a portion of a larger area identified in the Addendum ACHAR as requiring cultural heritage survey prior to construction works commencing. While this site had previously been disturbed by agricultural activity, there is uncertainty over what artefacts may have been harmed, and what harm may have been caused to any such artefacts. The possible cause of this potential incident was the failure to verify the location of the un-surveyed site prior to ground disturbance being undertaken.</p>	<p>Ensure that corrective and preventive actions as outlined in the incident report dated 17 June 2021 are implemented.</p>	<p>The following is a summary of actions undertaken to-date:</p> <ul style="list-style-type: none"> ▶ ARTC engaged an independent heritage consultant to provide expert advice on materiality of harm. ▶ The above consultants review concluded that the harm caused at each site was trivial. ▶ In addition, ARTC engaged an independent investigator from Safetywise to undertake an ICAM investigation to consider not only the causal factors that resulted in the disturbance but also to assist with legal advice. ▶ With consideration of the relevant findings from the ICAM investigation, ARTC have since undertaken an internal Lessons Learned Workshops. <p>Whilst ARTC have implemented corrective actions for the two events, there is no intention to close the matter out internally until externally notified stakeholders are satisfied as per the following requirements:</p> <p>Department of Planning, Industry and Environment (DPIE) Requirements</p> <ul style="list-style-type: none"> ▶ ARTC notified DPIE of the event as a potential incident under A41 of SP1 CSSI. ▶ ARTC are currently working with DPIE to close out the event to their satisfaction. ▶ DPIE have confirmed they are awaiting advice from NSW Heritage and will provide

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				<p>ARTC the outcome of advice as soon as possible.</p> <ul style="list-style-type: none"> ▶ ARTC has provided DPIE copies of relevant reports. <p>Register Aboriginal Parties (RAPs) Requirements</p> <ul style="list-style-type: none"> ▶ RAPs accompanying Niche during the initial identification of the events have been provided updates on the investigation and notification to DPIE. ▶ The RAPs have been given the opportunity to revisit the two sites and develop a salvage plan in consultation with Trans4M Rail. ▶ This site visit is still outstanding and is planned to be organised with Trans4M Rail in coming weeks. ▶ ARTC is also consulting with the RAPs on the proposed methodology to remedy the situation, including what additional action is needed for the demarcation to be removed.
E80	<p>All reasonably practicable erosion and sediment controls must be installed and appropriately maintained to minimise any water pollution. When implementing such controls, any relevant guidance in the Managing Urban Stormwater series must be considered.</p>	<p>Mitigation measures and erosion and sediment controls are outlined in Table 7-1 of the Construction Soil and Water Management Sub-Plan (2600-0018 N2NS Phase 1). Sediment fencing and use of geofabric coverings over stockpiles was observed during the site inspection. Daily inspections are undertaken of erosion and sediment controls with regular maintenance undertaken by a dedicated environmental maintenance team.</p> <p>The design and construction of drainage crossings and piling pads, particularly those inspected during the audit at Croppa Creek, Gurley Creek and Tycannah, have resulted in erosion and sedimentation of creek lines and drainage over recent rain events.</p> <p>Batters along the rail corridor works, observed at the Gurley Culverts site were not sufficiently maintained to manage sediment and erosion, particularly on the western side of the rail corridor.</p>	<p>It is recommended that the hydraulic model is reviewed considering the observations and data obtained during recent rain events. This modelling should consider the impact that saturated catchments have on the volumes of water within creek and drainage lines. Consideration should be given to the removal and reinstatement of larger piling pads and crossings with larger volume pipework, longer shallow downstream faces with larger rock and consideration of gabion baskets where required. It is further recommended that redesign of the piling pads accounting for the above elements should be undertaken in consultation with the CPESC, Engineering and Construction teams to achieve the required outcomes for the current and future drainage crossings.</p> <p>Batters established for erosion and sediment control along the rail corridors should be constructed and maintained to prevent damage by plant and equipment. These areas should also be subject to routine inspection to ensure that their integrity is maintained to minimise erosion and sedimentation of surrounding areas.</p>	<p>Trans4m Rail facilitated a workshop (27 July 2021), attended by the Project's Hydrologist, the Project's CPESC, the Trans4m Rail Construction Manager, the Trans4m Rail Engineering Manager, the Trans4m Rail Environment Manager, the Trans4m Rail Drainage and Structures Lead and Trans4m Rail Senior Environmental Advisor, whereby the details of this overtopping event were discussed, along with the current engineering and ESC Plan designs and amendments discussed to the current design to avoid a recurrence of such events.</p> <p>The following measures have since been taken at Croppa Creek to prevent a recurrence:</p> <ul style="list-style-type: none"> ▶ Installation of two (2) 1200mm pipes within the Croppa Creek piling pad / creek crossing for low and moderate flow conveyance. This is additional to the 600mm black max pipe detailed in the Certified Professional in Erosion and Sediment Control (CPESC) Certified Erosion and Sediment Control (ESC) Plan. ▶ Installation of large boulders (~800mm) on the downstream face to increase pad / creek crossing stability at high velocity / energy locations at Croppa Creek.

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				<ul style="list-style-type: none"> ▶ Installation of large rock (~400mm) on the downstream face to increase pad stability at Gurley Creek, Yallaroi Creek and Gil Gil Creek. ▶ Reinstatement of all ESC controls in accordance with the CPESC Certified ESC Plan, including a CPESC review of the ESC Plan to determine its suitability and to identify any further opportunities for improvement. <p>Recovery of the rock and gravel materials mobilised downstream at the sites has commenced and is expected to be completed by mid-December 2021.</p> <p>The relevant notified Events reported to DPIE have since been closed.</p> <p>Trans4M Rail have included Erosion and Sediment Controls in their Construction Supervisors daily checklist, including consideration of earth bunds ('batters') along the construction corridor to enable corrective actions where required.</p>

Table 2 – Opportunities for Improvement

OFI Reference	Condition Reference	Context	Opportunity for Improvement	Action / Status
OFI1	A6	Approvals of management plans	Recommended that approval consultation letters for all management plans be attached as appendix items to demonstrate compliance status.	Trans4M Rail agree to append the Planning Secretary's approval notification to the CEMP and Sub-plans in future revisions.
OFI2	A21	Minor Ancillary Facilities	<p>It is recommended that the CEMP be updated to reflect the use of a rapid assessment form for minor ancillary facilities.</p> <p>Review the management of lime loading facilities to minimise traffic of lime outside the MAF, or onto public roadways. This may include the use of additional loading controls to minimise spillage during loading and installation of shaker grids or rock crossings to reduce potential for tracking lime out of these areas. Provide training for operators in the use of control measures to minimise the spilling and tracking of lime.</p> <p>Ensure that liquids are stored in appropriately bunded areas. Refuelling should not occur within the catchment of watercourses to reduce the risk of spills.</p>	Refer Table 1 – MCoA A21
OFI3	C5-C6	CEMP Sub-plans	<p>Condition C5 references "the CEMP sub plans listed in Condition 0" – this reference to Condition 0 appears to be a typographical error and is assumed to be referencing Condition 4. Clarification should be sought from</p> <p>DPIE to confirm this reference and the approval modified accordingly.</p>	DPIE to update the SSI7474 approval notice with the correct reference. It is noted that this error is also repeated in MCoA - A18, C6, E10, E11, E38, E42, E67 and E72.
OFI4	C18	Construction Monitoring Programs	While baseline data and monitoring requirements are included in various sub-management plans, it is recommended that a standalone construction monitoring program is developed to provide a single consolidated location for monitoring requirements.	<p>It is not proposed to prepare a standalone Construction Monitoring program. The Construction Monitoring Programs have been prepared in accordance with the MCoA C16-C20 and in line specifically with MCoA C20 – <i>Note</i>.</p> <p>The results of the Construction Monitoring Programs will be provided in a consolidated Construction Monitoring Report as per MCoA C20.</p>
OFI5	E35	Water Quality and Drainage	It is recommended that the hydraulic model is reviewed considering the observations and data obtained during recent rain events. This modelling should consider the impact that saturated catchments have on the volumes of water within creek and drainage lines. Consideration should be given to the removal and reinstatement of larger piling pads and crossings with larger volume pipework, longer shallow downstream faces with larger rock and consideration of gabion baskets where required. It is further recommended that redesign of the piling pads accounting for the above elements should be undertaken in consultation with the CPESC, Engineering and Construction teams to achieve the required outcomes for the current and future drainage crossings.	Refer Table 1 – MCoA E80
OFI6	E66	Construction Heritage Management Sub Plan	Check and update cross referencing in the Construction Heritage Management Sub Plan.	Trans4M Rail will undertake a review of the Construction Heritage Management Sub Plan as part of the next scheduled review and rectify any identified cross-referencing issues.
OFI7	E71	Heritage Item Disturbances	Ensure that corrective and preventive actions as outlined in the incident report dated 17 June 2021 are implemented.	Refer Table 1- MCoA E71

OFI Reference	Condition Reference	Context	Opportunity for Improvement	Action / Status
OFI8	E80	Mitigation measures and erosion and sediment controls	<p>It is recommended that the hydraulic model is reviewed considering the observations and data obtained during recent rain events. This modelling should consider the impact that saturated catchments have on the volumes of water within creek and drainage lines. Consideration should be given to the removal and reinstatement of larger piling pads and crossings with larger volume pipework, longer shallow downstream faces with larger rock and consideration of gabion baskets where required. It is further recommended that redesign of the piling pads accounting for the above elements should be undertaken in consultation with the CPESC, Engineering and</p> <p>Construction teams to achieve the required outcomes for the current and future drainage crossings.</p> <p>Batters established for erosion and sediment control along the rail corridors should be constructed and maintained to prevent damage by plant and equipment. These areas should also be subject to routine inspection to ensure that their integrity is maintained to minimise erosion and sedimentation of surrounding areas.</p>	Refer Table 1 – MCoA E80
OFI9	General	<p>Work packs containing environmental management documentation were missing at the Croppa Creek and Gill Gill Creek sites on 12 July 2021.</p> <p>The site-specific flood management plan was missing from the work pack for the Yallaroi site on 12 July 2021.</p>	Ensure that work packs are maintained and kept at all site locations.	Trans4M Rail agree and will action to ensure that work packs are maintained and kept at all site locations, and that all relevant information is included in the packs.
OFI10	General	The PPW system is used for recording inspections, audits and actions. Evidence of closure of actions was limited and did not include photos or other evidence in some cases.	Ensure that photos or other evidence are uploaded in PPW to confirm closure of actions.	Trans4M Rail has actioned to ensure that photographs and other evidence is provided in PPW to demonstrate closure of actions.