

INLAND RAIL N2NS INDEPENDENT ENVIRONMENTAL AUDIT

Audit 3 - Construction



AU212001105

1

06 October 2022

REPORT

Document status

Version	Purpose of document	Authored by	Reviewed by	Approved by	Review date
0	Draft for Client Review	Sam Mitchell	Ian Richardson	Ian Richardson	30/09/2022
1	Final for Submission	Sam Mitchell	Ian Richardson	Ian Richardson	06/10/2022

Approval for issue

Ian Richardson



6 October 2022

This report was prepared by RPS within the terms of RPS' engagement with its client and in direct response to a scope of services. This report is supplied for the sole and specific purpose for use by RPS' client. The report does not account for any changes relating the subject matter of the report, or any legislative or regulatory changes that have occurred since the report was produced and that may affect the report. RPS does not accept any responsibility or liability for loss whatsoever to any third party caused by, related to or arising out of any use or reliance on the report.

Prepared by:

RPS AAP Consulting Pty Ltd

Ian Richardson
General Manager, Newcastle – P&E

Unit 2A, 45 Fitzroy Street
Carrington NSW 2294

T +61 2 4940 4200
E ian.richardson@rpsgroup.com.au

Prepared for:

Australian Rail Track Corporation

Belinda Jones
HSE Audit and Assurance Lead

Level 16, 180 Ann St
Brisbane QLD 4000

T +61 456 957 280
E bjones2@ARTC.com.au

Contents

GLOSSARY OF TERMS	1
EXECUTIVE SUMMARY	5
1 INTRODUCTION	6
1.1 Background of the Project	6
1.1.1 Approval History	6
1.1.2 Works within the Audit Period	7
1.2 Audit team	13
1.2.1 Additional Resourcing	13
1.3 Audit Objective	13
1.4 Audit Scope	13
1.5 Audit Period	14
2 AUDIT METHODOLOGY	15
2.1 Task 1 Audit Preparation	15
2.1.1 Pre-Audit Meeting and Documentation Requests	15
2.1.2 Approval and Regulator Consultation	15
2.2 Task 2 Site Inspection and Interviews	15
2.2.1 Opening Meeting	15
2.2.2 Site Inspection and Interviews	16
2.2.3 Close-out Meeting	16
2.3 Task 3 Draft IEA Report	16
2.4 Task 4 Finalise IEA Report	16
2.5 Scope Development	16
2.6 Consultation	16
2.7 Site Inspection	17
2.7.1 Opening and Closing Meetings	17
2.8 Compliance Status	18
2.9 Evidence Validation	18
3 ENVIRONMENTAL MANAGEMENT	19
4 ENVIRONMENTAL PERFORMANCE	22
4.1 Compliance Management	22
4.1.1 Compliance Monitoring	22
4.1.2 Environmental Representative	22
4.2 Incidents	23
4.3 Complaints	24
5 RESPONSE TO PREVIOUS AUDIT FINDINGS	25
6 AUDIT FINDINGS	26
6.1 Identified Non-Compliances and Recommendations	26
6.2 Summary of Opportunities for Improvement	28

Tables

Table 1	Regulator Response Summary	17
Table 2	Compliance Status Descriptors	18
Table 3	Management Plan Implementation Review	19
Table 4	Summary of Audit Findings	26
Table 5	Non-Compliances against SSI 7474	26
Table 6	Summary of Opportunities for Improvement	28

Plates

Plate 1 – PAD 6 Project Information Board	35
Plate 2 – PAD 6	35
Plate 3 – Subgrade installed in alignment	36
Plate 4 – Temporary stockpile not adequately managed in accordance with SWMP	36
Plate 5 – PAD 6 Dust Deposition Gauge	37
Plate 6 – Survey Tree at PAD 6	37
Plate 7 – Road located over root zone of survey tree at PAD 6	38
Plate 8 – Batter diversion along alignment CH621	38
Plate 9 – Temporary stockpile not adequately managed in accordance with SWMP along alignment CH621	39
Plate 10 – Bellata CH614.77 muddy condition along alignment	39
Plate 11 – Bellata CH614.77 clean water diversions	40
Plate 12 – Bellata CH614.77 clean water pump out location	40
Plate 13 – Bellata CH614.77 culverts	41
Plate 14 – Bellata platform works	41
Plate 15 – CH616.02 GeoLink on site during pre-clearance works.	42
Plate 16 – Lime storage area noted to be better managed with minimal to no spillage over road surfaces	42
Plate 17 – Example of road closure alerts sent to all project staff	43
Plate 18 – Lime application in process	43
Plate 19 – Gate 7 vehicle movement plan	44
Plate 20 – Gate 7 Pre-start meeting record during site inspection	44
Plate 21 – Survey mark at Gate 7	45
Plate 22 – Sediment control structures within CIZ along with signposting at Gate 7	45
Plate 23 – Rumble grid utilised at Gate 7 MAF	46
Plate 24 – Spray grass applied to batter	46
Plate 25 – Bobbiwa Bridge	47
Plate 26 – Bobbiwa Bridge evidence of erosion of rock protection	47
Plate 27 – Bobbiwa Bridge minor material located within pipes	48
Plate 28 – Delineated CIZ with flagging and signage	48
Plate 29 – 10 Mile Creek Bridge	49
Plate 30 – 10 Mile Creek Bridge evidence of pad erosion	49
Plate 31 – 10 Mile Creek piling pad blockage	50
Plate 32 – 10 Mile Creek concrete spillage on piling pad	50
Plate 33 – 10 Mile Creek piling pad blockage	51
Plate 34 – PAD 2 Gurley Bridge temporary stockpile	51
Plate 35 – PAD 2 Gurley Bridge weeds noted during inspection	52
Plate 36 – PAD 2 Gurley Bridge	52
Plate 37 – PAD 2 Gurley Bridge causeway with indications of sediment migration and erosion downstream	53
Plate 38 – Yallaroi laydown stockpile contaminated with foreign materials	53
Plate 39 – Yallaroi laydown poor house keeping observed	54
Plate 40 – Yallaroi laydown poor house keeping observed	54
Plate 41 – Croppa Creek Bridge	55
Plate 42 – Croppa Creek Bridge	55

Figures

Figure 1 Project Location and Context	12
---	----

Appendices

Appendix A Planning Secretary Audit Team Approval

Appendix B SSI 7474 IEA Audit Checklist

Appendix C Stakeholder Consultation Summary

Appendix D Response to Previous Audit

Appendix E Site Inspection Photographs

Appendix F Opening and Closing Meeting Records

GLOSSARY OF TERMS

Term	Description
Aboriginal object	The same meaning as in the <i>National Parks and Wildlife Act 1974</i> (NSW).
Ancillary facility	A temporary facility for construction of the CSSI including office and amenities compound, construction compound, material crushing and screening plant, materials storage compound, maintenance workshop, testing laboratory, car parking compound, a site used for assembly of infrastructure, and material stockpile area. <i>Note: Where a CEMP has been approved by the Planning Secretary and it includes a stockpile management protocol, a temporary material stockpile located within the construction boundary is not an ancillary facility.</i>
AHD	Australian Height Datum
AEP	Annual Exceedance Probability – The probability that a given rainfall total accumulated over a given duration will be exceeded in any one year
ARI	Average Recurrence Interval – The average, or expected, value of the periods between exceedances of a given rainfall total accumulated over a given duration.
At-property treatment	Acoustic treatments including those described in Section 7.3 of the Noise Mitigation Guideline (TfNSW(RMS), 2015) and other treatments including, but not limited to, noise curtains and retrofitted double glazing.
CEMP	Construction Environmental Management Plan
Completion of construction	The date upon which all construction is completed and all requirements of the Planning Secretary (if any) have been met. If construction is staged, completion of construction is the date upon which construction is completed and all requirements of the Planning Secretary (if any) have been met, in respect of all stages of construction.
Conditions of approval	The Minister's conditions of approval for the CSSI.
Construction	Includes all work required to construct the CSSI as described in the Project Approval, including commissioning trials of equipment and temporary use of any part of the SSI, but excluding low impact work which is completed prior to approval of the CEMP as outlined in detail in the Project Approval.
Construction Boundary	The area required for project construction as described in the EIS and as amended by the SPIR.
CSSI	The critical State significant infrastructure, as generally described in Schedule 1 of The Project Approval, the carrying out of which is approved under the terms of this approval.
Department / DPIE	NSW Department of Planning, Industry and Environment
DEC	Former Department of Environment and Conservation
DECC	Former NSW Department of Environment and Climate Change
DIPNR	Former NSW Department of Infrastructure, Planning and Natural Resources
DAWE	Commonwealth Department of Agriculture, Water and Environment (former Department of the Environment and Energy)
DPC	Department of Premier and Cabinet (all Heritage related functions)
EIS	The Environmental Impact Statement submitted to the Secretary seeking approval to carry out the proposal described in it and as revised if required by the Secretary under the EP&A Act, and including any additional information provided by the Proponent updating the information presented in the EIS.
EES	Environment, Energy and Science Group of the Department of Planning, Industry and Environment (former NSW Office of Environment and Heritage)
EMS	Environmental Management System

REPORT

Term	Description
Environment	Includes all aspects of the surroundings of humans, whether affecting any human as an individual or in his or her social groupings.
Environmental Representative Protocol	The document of the same title published by the Department.
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth)
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence under the <i>Protection of the Environment Operations Act 1997</i>
ER	The Environmental Representative for the CSSI.
Heavy Vehicle	Has the same meaning as in the <i>Heavy Vehicle National Law (NSW) No 42a</i>
Heritage item	A place, building, structure, work, relic, archaeological site, tree, movable object or precinct of heritage significance, that is listed under one or more of the following registers: the State Heritage Register under the <i>Heritage Act 1977</i> , a state agency heritage and conservation register under section 170 of the <i>Heritage Act 1977</i> , a Local or Regional Environmental Plan under the EP&A Act, the World, National or Commonwealth Heritage lists under the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Commonwealth), and an Aboriginal object or Aboriginal place as defined in section 5 of the <i>National Parks and Wildlife Act 1974</i> .
Highly noise intensive work	Work which is defined as annoying in the ICNG
ICNG	Interim Construction Noise Guideline (DECC, 2009)
Incident	An occurrence or set of circumstances that causes or threatens to cause material harm and which may or may not be or cause a non-compliance. Note: "material harm" is defined in this approval
Land	Has the same meaning as in the EP&A Act.
Landowner	Has the same meaning as "owner" in the Local Government Act 1993 and in relation to a building means the owner of the building.
Local road	Any road that is not defined as a classified road under the Roads Act 1993.
ICNG	Interim Construction Noise Guideline (DECC, 2009)
Material harm	This is harm that: <ol style="list-style-type: none"> a) involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or b) results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment).
Minister	NSW Minister for Planning and Public Spaces
Noise Management Level	Noise Management Level as defined in the <i>Interim Construction Noise Guideline</i> (DECC, 2009)
Non-compliance	An occurrence, set of circumstances or development that is a breach of this approval but is not an incident.
NSW Heritage Council	Heritage Council of NSW
OEH	Former NSW Office of Environment and Heritage
OEMP	Operational Environmental Management Plan

Term	Description
Operation	<p>The carrying out of the SSI (whether in full or in part) upon the completion of construction.</p> <p><i>Note: There may be overlap between the carrying out of construction and operation if the phases of the development are staged through a Staging Report. Commissioning trials of equipment and temporary use of any part of the SSI are within the definition of construction.</i></p>
ONCR	Operational Noise Compliance Report
ONVR	Operational Noise and Vibration Review
Planning Secretary	Secretary of the NSW Department of Planning, Industry and Environment or nominee, whether nominated before or after the date on which this approval was granted.
PCT	Plant Community Type as related to the BioNet Vegetation Classification system.
Proponent	The person identified as the proponent in Schedule 1 of this approval and any other person carrying out any part of the CSSI from time to time.
Rail corridor	<p>Land that is:</p> <ul style="list-style-type: none"> - owned, leased, managed or controlled by a public authority for the purpose of a railway or rail infrastructure facilities, or - zoned under an environmental planning instrument predominantly or solely for development for the purpose of a railway or rail infrastructure facilities.
Relevant council(s)	Narrabri, Moree Plains and Gwydir Shire Councils (as relevant)
Relevant Road Authority	The same meaning as the road authorities defined in the Roads Act 1993.
Relic	The same meaning as the definition of the term in section 4 of the Heritage Act 1977 (NSW).
Sensitive receiver	Residence, educational institution (e.g. school, university, TAFE college), health care facility (e.g. nursing home, hospital), religious facility (e.g. church), child care centres, passive recreation areas (including outdoor grounds used for teaching), commercial premises (including film and television studios, research facilities, entertainment spaces, temporary accommodation such as caravan parks and camping grounds, restaurants, office premises, and retail spaces), and others as identified by the Planning Secretary.
Site establishment works	Activities undertaken to establish an ancillary facility so that it is able to be used to support the construction of the CSSI, including demolition of existing structures on the site, erection of site fencing / hoarding, provision of utility services to the site, site levelling, provision of site access, erection of demountable buildings, provision of hardstand areas, and erosion and sedimentation controls.
SPIR	The Submissions and Preferred Infrastructure Report
TfNSW	Transport for NSW (including the former Roads and Maritime Services)
Tree	As defined in Australian Standard AS 4372-2007 Pruning of Amenity Trees.
Unexpected heritage find	A potential heritage item discovered (usually during construction) but not identified in the EIS, SPIR or RFI response, where assessment is required to determine if the item has heritage significance or is an Aboriginal object. An unexpected heritage find does not include human remains.
Water Group	Water Group of the Department and the National Resources Access Regulator
Works	Any physical work for the purpose of the CSSI including construction and low impact work but not including operational maintenance work

INDEPENDENT AUDIT REPORT DECLARATION FORM

Independent Audit Report Declaration Form

Project Name	Narrabri to North Star (N2NS Phase 1) – Independent Environmental Audit
Consent Number	Project Approval SS1 7474
Description of Project	Completion of an Independent Environment Audit, in accordance with Schedule 2 of Project Approval SS1 7474 in accordance with the Independent Audit Post Approval Requirements (2020).
Project Address	Land within the existing rail corridor between Narrabri and Moree; and Camurra and North Star.
Proponent	Australian Rail Track Corporation (ARTC) ABN 75 081 455 754
Title of Audit	INLAND RAIL N2NS PHASE 1 – INDEPENDANT ENVIRONMENTAL AUDIT – Audit 3 - Construction
Date	6 October 2022

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	Ian Richardson
Signature	
Qualification	Bachelor of Environmental Science Exemplar Global Certified Lead Auditor – Environmental Management Systems (ISO 14001)
Company	RPS AAP Consulting Pty Ltd
Company Address	RPS Newcastle – Unit 2A, 45 Fitzroy Street, Carrington NSW 2294

EXECUTIVE SUMMARY

RPS Group (RPS) was engaged by Australian Rail Track Corporation (ARTC) to conduct an Independent Environmental Audit (IEA) of the Narrabri to North Star (N2NS) Phase 1 Project located on land within the existing rail corridor between Narrabri and Moree; and Camurra and North Star.

Completion of an Independent Environment Audit, in accordance with Schedule 2 of Project Approval SS1 7474 in accordance with the Independent Audit Post Approval Requirements (2020).

This is the second IEA to be undertaken for N2NS Phase 1 as part of a six (6) monthly auditing program for two (2) years. The audit period to which this audit applies is inclusive of the period from 10 February to 3 August 2022. This report presents the findings of the audit.

The audit consisted of a site inspection, document review and interviews with key representatives of the project team responsible for the environmental management of the project during construction. The audit was limited to the implementation of obligations, commitments, and environmental practices either at the time of the audit or in the preceding period.

The objective of the audit is to assess project compliance against the SSI 7464 as required by Condition A36.

A summary of audit findings includes the following assessment against the Project Approval conditions:

- 104 – Compliances.
- 2 – Non-compliances.
- 64 – Not triggered.

There were thirty-five (35) Incidents during the audit period. These consisted of non-reportable and reportable incidents.

A total of fifty-three (53) complaints have been received for the project during the audit period.

1 INTRODUCTION

RPS AAP Consulting Pty Ltd (RPS) was engaged by Australian Rail Track Corporation (ARTC) to conduct an Independent Environmental Audit (IEA) of the Narrabri to North Star (N2NS) Phase 1 Project located on land within the existing rail corridor between Narrabri and Moree; and Camurra and North Star.

Completion of an Independent Environment Audit, in accordance with Schedule 2 of Project Approval SS1 7474 in accordance with the Independent Audit Post Approval Requirements (2020).

This is the third IEA to be undertaken for N2NS Phase 1 as part of a six (6) monthly auditing program during construction. The audit period to which this audit applies is inclusive of the period from 10 February 2022 to 3 August 2022.

This report presents the findings of the audit.

1.1 Background of the Project

N2NS Phase 1 is one of 13 projects that make up the Inland Rail Project. The route is within the Narrabri, Moree Plains and Gwydir Local Government Areas (LGAs) in northwest NSW. N2NS Phase 1 extends approximately 173 kilometres (km) from north of Narrabri Junction, terminating at North Star (Figure 1) and the project is generally within the existing rail corridor. The Gwydir Floodplain works (shown in green in Figure 1) will be undertaken under a separate SSI approval for N2NS Phase 2. The key works involved with N2NS Phase 1 are:

- Upgrading the track, track formation, culverts, and underbridges within the existing rail corridor, for approximately 173km, between Narrabri and North Star via Moree.
- Realigning the track within the existing rail corridor at Bellata, Gurley, and Moree stations to conform with required platform clearances for Inland Rail trains.
- Providing five new crossing loops within the existing rail corridor at Bobbiwaa, Waterloo Creek, Tycannah Creek, Coolleearlee, and Murgo.
- Providing a new section of rail line at Camurra about 1.6 kilometres long, to bypass the existing hairpin curve ('the Camurra bypass').
- Removing three existing rail bridges and providing new rail bridges over the Mehi and Gwydir rivers and Croppa Creek.
- Realigning approx. 1.5 kilometres of the Newell Highway near Bellata and providing a new road bridge over the existing rail corridor ('the Newell Highway overbridge').
- Providing a new road bridge over the existing rail corridor at Jones Avenue in Moree ('the Jones Avenue overbridge').

Trans4M Rail (an unincorporated Joint Venture between SEE Civil Pty Ltd and John Holland Pty Ltd) have been engaged by Australian Rail Track Corporation (ARTC) to construct the Narrabri to North Star (Separable Portion 1) (N2NS Phase 1) section of the Inland Rail Project.

N2NS Phase 1, has continued, to employ locals in the Narrabri to North Star area including:

- 517 people in total, of whom 69 are Indigenous;
- 156 local residents, of whom 45 local Indigenous;
- 59 women; and
- 38 people in a sustainable role (employed for 26 weeks or more for a minimum of 15 hours a week).

The project construction is scheduled for completion in 2023 with full operation in 2025.

1.1.1 Approval History

Project Approval SSI 7474 for the N2NS Phase 1 Project was issued on 13 August 2020 to ARTC. The Project Approval has not been modified during the audit period.

1.1.2 Works within the Audit Period

The following minor ancillary facility and construction works completed during the audit period are summarised below as detailed in the Environmental Representative's Monthly Reports.

February 2022

Stage 1 (CH574.700 - CH625.000)

- Early works includes:
- Pre-Clearing Surveys
- Preparation of approval for Ancillary Facilities
- Preparation of Erosion & Sediment Control Plans, Site Environmental Plans, etc
- Commencement of Environmental Monitoring (i.e. Noise, Dust, Weather Station)
- Slashing and weed management activities
- Establishment of Environmental Controls (i.e. No Go Zone Signage, Erosion and Sediment Controls, etc).
- Ballast brushing works through Stage 1.

Stage 2Ai (CH625.700 – CH641.900) & Stage 2Aii (CH647.000 - CH658.000)

- Fence installation.
- Combined Services Route installation. Note: These works were ceased due to a FCWS find.

Stage 3 (CH681.000 – CH760.500)

Earthworks and Pavements

- Topsoil has been stripped for all of Stage 3 (CH681.000 - CH760.499)
- Bulk earthworks have been completed from CH681.000 – CH743.000 and are currently occurring between CH743.000 – CH760.499.
- Capping material has been placed from CH681.000 – CH716.000.
- Bottom ballast has been placed from CH681.000 – CH704.000

Structures & Drainage

Demolition of existing and construction of new culverts occurring between CH681.000 – CH760.499. All culverts from CH681.000 - CH708.000 have been completed. Existing structures at Tackinbri and Mungle Creek Bridges have been demolished. Croppa Creek Bridge: Super T's have been placed and cast insitu deck commenced. Gil Gil Creek and Yallaroi Creek Bridges: Sub and super structures complete.

Rail Activities

Rail stripping (i.e. rail, jewellery & sleeper removal) has occurred for all of Stage 3 (from CH681.000 - CH760.499). Sleepers and rail were laid from CH681.000 – CH686.000. Stockpiling of ballast, rail, and sleepers along the alignment.

March 2022

Stage 1 (CH574.700 - CH625.500)

Early works includes:

- Preparation of approval for Ancillary Facilities.
- Preparation of Erosion & Sediment Control Plans, Site Environmental Plans, Construction Noise and Vibration Impact Statements, Site Specific Flood Preparation Plans, etc
- Commencement of Environmental Monitoring (i.e. Noise, Dust, Weather Station).

REPORT

- Slashing and weed management activities.
- Establishment of Environmental Controls (i.e. No Go Zone Signage, Erosion and Sediment Controls, etc).
- Service Location.
- Survey set-out and establishment of No Go Zone Demarcation through Stage 1.
- FCWS Trapping / Survey within Stage 1. Includes the establishment of FCWS relocation sites.

Stage 2Ai (CH625.700 – CH641.900) & Stage 2Aii (CH647.000 - CH658.000)

- Fence installation.
- Combined Services Route installation. Note: These works were ceased due to a FCWS find.

Stage 2B & Stage 2D

- Preparation of approval for Ancillary Facilities, ESCP, etc.

Stage 3 (CH681.000 – CH760.500)

Earthworks and Pavements

- Topsoil has been stripped for all of Stage 3 (CH681.000 - CH760.499)
- Bulk earthworks have been completed from CH681.000 – CH749.000 and are currently occurring between CH749.000 – CH760.499.
- Capping material has been placed from CH681.000 – CH718.000.
- Bottom ballast has been placed from CH681.000 – CH717.000
- Landscaping commenced in Stage 3 CH681 – CH686.

Structures & Drainage

- Demolition of existing and construction of new culverts occurring between CH681.000 – CH760.499. All culverts from CH681.000 - CH718.000 have been completed.
- Existing structures at Tackinbri and Mungle Creek Bridges have been demolished.
- Croppa Creek Bridge: Cast insitu deck complete.
- Gil Gil Creek and Yallaroi Creek Bridges: Sub and super structures complete.

Rail Activities

- Rail stripping (i.e. rail, jewellery & sleeper removal) has occurred for all of Stage 3 (from CH681.000 - CH760.499).
- Sleepers and rail have been laid from CH681.000 – CH707.000.
- Stockpiling of ballast, rail, and sleepers along the alignment.

April 2022

Stage 1 (CH574.700 - CH625.500)

- Establishment of priority Minor Ancillary Facilities within Stage 1.
- Stripping, stacking and loading out of rail, sleepers and jewellery commenced through Stage 1.
- Stripping of topsoil at priority locations, approx. 17,000lm (both sides) stripped in April.
- Bulk earthworks (incl. foundation treatment) commenced at priority locations.
- Demolition of the existing bridges at Bobbiwaa and Ten Mile Creeks completed. The temporary piling pad at Ten Mile Creek has been constructed.
- Demolition of the existing culverts at priority locations throughout Stage 1.

REPORT

- Establishment of controls at Spring Creek and Tookey Creek in preparation for the demolition and construction of these culverts.

Stage 2Ai (CH625.700 – CH641.900) & Stage 2Aii (CH647.000 - CH658.000)

- Fence installation.
- Continue with combined Services Route (Waterloo) installation.

Stage 2B

- Establishment of priority Minor Ancillary Facilities.
- All rail and sleeper stripping and signalling removal activities completed.
- Stripping of topsoil completed within all Stage 2B.
- Bulk earthworks including foundation treatment commenced.

Stage 3 (CH681.000 – CH760.500)

- Bulk earthworks completed within Stage 3.
- Capping completed from CH681 – CH739, with some small sections north of CH725 still requiring capping.

Bottom ballast placed from CH681 – CH718.

- Rail placed from CH681 – CH718 and sleepers laid from CH725 - CH730 (directly onto capping).
- Removal of temporary works at Yallaroi Creek.
- Continue with the construction of culverts from CH742.000 north.
- Croppa Creek Bridge: Final pour of span 1 and installation of handrails.
- Preparation for landscape treatment from CH681 – CH707.

May 2022

Stage 1 (CH574.700 - CH625.500)

- All topsoil stripped from approx. CH580 – CH625.
- The entire formation boxed out from CH593 – CH625.

Layer 1 and 2 stabilised from CH619 – CH625 and layer 1 or 2 stabilisation occurring between CH593 – CH609.

- Establishment of piling pads at Ten Mile Creek and Bobbiwaa Creeks.
- Piling completed at Ten Mile Creek.
- Foundation preparation and culverts installed at Spring Creek.
- Culvert installation occurring from CH578 – CH586. Culverts and wingwalls predominantly landed and awaiting apron slabs, scour rock and backfill.
- Seven (7) level crossings are currently under construction within Stage 1.

Stage 2Ai (CH625.700 – CH641.900) & Stage 2Aii (CH647.000 - CH658.000)

- Fence installation approximately 90% complete through Stage 2Ai and 2Aii.
- Completed installation of the underground (pits and pipes) components associated with the Waterloo Combined Services Route (CSR).

Stage 2B

- All Stage 2B foundation has been boxed out.
- Foundation preparation under the formation has commenced.
- The foundation under the 2 large culverts has been stabilised.

Stage 3 (CH681.000 – CH760.500)

- Capping material has been placed from CH681 – CH740 and from CH755 - 758 (just south of North Star).

Top and bottom ballast has been placed from CH681 – CH718 (Crooble).

- Landscaping has been completed from CH681 – CH693.
- All culverts from CH681 - CH742 (Yallaroi Creek) have been installed, with only 5 culverts remaining between CH742 – CH760.
- Removal of the piling pad at Croppa Creek.
- Sleeper and rail placement occurred from CH681 – 733.

June 2022

Stage 1 (CH574.700 - CH625.500) & Stage 2B

- Earthworks in progress, stabilising of Layer 1 and 2 in progress – more than 50% complete.
- Drainage commenced between 576.4 and 589 with 50 structures completed.
- Capping works commenced at Bobbiwaa Siding. More locations to commence.
- Bridge works continuing at 10 Mile and Bobbiwaa with piling completed and superstructure in progress on Ten Mile Bridge.
- LC works progressing well – 42% progress.
- Track – Commenced relocating sleepers out of the way for earthworks to complete
- Signalling CSR works in progress at Bobbiwaa/Tarlee Rd, Penny's and Waterloo. All design Mods completed.

Stage 2Ai (CH625.700 – CH641.900) & Stage 2Aii (CH647.000 - CH658.000)

- Fence installation approximately 90% complete through Stage 2Ai and 2Aii.
- Completed installation of the underground (pits and pipes) components associated with the Waterloo Combined Services Route (CSR).

Stage 3 (CH681.000 – CH760.500)

- Earthworks Completed. Landscaping and fencing in progress.
- Drainage structures & Aprons/Cut off walls and backfill – 100% completed
- Capping in Stage 3 in progress 741 to 751- 95% of the capping placed, under proof rolling.
- Croppa Creek Bridge all close out and clean up also completed.
- LC works in full progress – 71% complete
- Track in full progress with track laid to 741 Kms and 19 kms to go. Ballasting, Surfacing & Destressing operations in progress.
- Signalling CSR work in progress at Milguy and closing out Coollearlee. All design Mods completed.

July 2022

Stage 1 (CH574.700 - CH625.500)

- Topsoil strip to occur from south of CH581 –Ch 586.2 – Bobbiwaa Bridge
- Continue stabilisation of layers 1 and 2 from Ch 574880 - 617500
- Superstructure at Ten Mile & Bobbiwaa Creek.
- Culvert installation to continue north from CH593.

- Continue construction of the 7 LX's currently under construction.
- Continue capping and commence bottom ballast at various locations

Stage 2Ai (CH625.700 – CH641.900) & Stage 2Aii (CH647.000 - CH658.000)

- Fence installation within Stage 2Ai and 2Aii (i.e., remaining includes 800m at Tycannah and around level crossings) to continue.
- Installation of signalling and huts associated with the Waterloo Combined Services Route.
- Trackworks at Waterloo Siding
- Punchlist works at Gurley Bridge

Stage 2B

- Fence installation within Stage 2Ai and 2Aii (i.e. remaining includes 800m at Tycannah and around level crossings) to continue.
- Installation of signalling and huts associated with the Waterloo Combined Services Route.
- Trackworks at Waterloo Siding
- Punchlist works at Gurley Bridge

Stage 3 (CH681.000 – CH760.500)

- Capping proof rolls to occur from CH742 –CH751.
- Rail and sleeper placement to occur north from CH742. Ballasting, Surfacing and Destress operations to continue
- Landscaping and fencing to continue
- Removal of the Piling pad at Gil Gil Creek.



Figure 1 Project Location and Context

1.2 Audit team

As approved by the Secretary of the Department of Planning and Environment (DPE) on 3 February 2021 with an additional assistant auditor approval issued by the Secretary of the DPE on 12 July 2021 (refer to **Appendix A**) the audit team consisted of:

- Ian Richardson, RPS Group – Lead Auditor; and
- Sam Mitchell, RPS Group – Assistant Auditor

Ian Richardson is an experienced Lead Auditor for Environmental Audits in a range of sectors including mining, power, transport, commercial, government and Defence. Ian has 25 years' experience working in environmental impact assessment and management, work health and safety, hazardous materials and project management in both the private and government sectors.

Sam Mitchell is a suitably qualified and experienced Exemplar Global ISO14001:2015 Lead Auditor and holds a Bachelor of Environmental Science and Management. Sam has extensive experience in a number of disciplines including environmental planning and auditing, environmental and WHS compliance monitoring, and project management for a range of industries.

1.2.1 Additional Resourcing

No technical specialists were requested by DPE for the independent environmental audit.

Suitable representatives from the project team were available during the audit including those responsible for the delivery of the project and environmental management to provide evidence to verify project compliance.

1.3 Audit Objective

The objective of the audit is to:

- Assess compliance against the requirements of the infrastructure approval SSI 7474 (the Project Approval) issued on 13 August 2020 under the *Environmental Planning and Assessment Act 1979*.

1.4 Audit Scope

The scope requirements for the IEA under Schedule 2 of SSI 7474 are detailed below:

A35 - Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.

A36 - Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).

A37 - The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice (or timing as stipulated by the Planning Secretary) to the applicant of the date upon which the audit must be commenced.

A38 - In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Proponent must:

- a. review and respond to each Independent Audit Report prepared under Condition A36 or Condition A37;
- b. submit the response to the Planning Secretary; and
- c. make each Independent Audit Report and response to it publicly available 60 days after submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary.

A39 - Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.

A40 - Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.

1.5 Audit Period

The audit period is for the current construction stages of the project and extends from 10 February 2022 to 3 August 2022.

2 AUDIT METHODOLOGY

RPS undertook the IEA in accordance with the following methodology:

- Task 1: Audit preparation.
- Task 2: Site visit and interviews.
- Task 3: Preparation of a draft IEA report for review by ARTC.
- Task 4: Finalisation of the IEA report.

2.1 Task 1 Audit Preparation

2.1.1 Pre-Audit Meeting and Documentation Requests

RPS undertook initial discussions with ARTC and Trans4m Rail to organise the audit, including the provision of documentation through requests for information (RFI) and provided an Audit Agenda for the site visit and timing. Review of documentation provided by ARTC and Trans4m Rail along with their representatives and preparation of compliance assessment checklists that included a list of conditions of key regulatory approvals to be assessed for compliance.

A pre-audit meeting was undertaken on 26 July 2022 between RPS and ARTC as part of a desktop assessment of the project prior to the site inspection.

2.1.2 Approval and Regulator Consultation

Following DPE approval of the RPS Audit Team, RPS consulted via email with relevant regulators with respect to the audit scope in accordance with the DPE *Independent Audit Post Approval Requirements, 2020*.

Relevant comments and requests from these regulators were included in the Audit Report and investigated as part of the audit as required.

2.2 Task 2 Site Inspection and Interviews

A proposed audit schedule was issued to DPE and was subsequently approved on 6 July 2022. DPE agreed for Audit 3 site inspection to be undertaken on 2-3 August 2022 with the IEA report submission deadline to DPE due 3 October 2022.

The Audit Team conducted the audit site inspection over a two (2) day period on 2 and 3 August 2022, comprising of:

- Document reviews.
- Interviews with relevant personnel.
- Site inspection.

Opening and closing meetings were held to ensure open communication with ARTC and Trans4m Rail providing preliminary Audit findings. The audit was conducted as per the Audit Agenda, which was agreed upon prior to the site visit.

2.2.1 Opening Meeting

An opening meeting was undertaken on 2 August 2022 as part of the first day of the site inspection. The purpose of this meeting was to confirm the objectives of the audit, the scope of the audit, the resources required and methodology to be applied. In addition to the above items, interviews with the project team regarding community consultation, non-conformances from the previous audit, stakeholder consultation, and incidents was also undertaken.

2.2.2 Site Inspection and Interviews

The Lead Auditor and Auditors Assistant undertook a site inspection, which involved physical validations and collection of a photographic record. The auditor's observations used to supplement information gathered during the review of documents and records. During the site inspection, interviews were conducted to verify compliance with the Project Approval.

2.2.3 Close-out Meeting

A brief close-out meeting was held with relevant ARTC and Trans4m Rail personnel on 3 August 2022. The purpose of the close-out meeting was to provide and receive feedback on the audit process and present the summary of preliminary findings, recommendations, and any post-audit actions. It should be noted that additional findings based on detailed document reviews as part of the audit process were required following the completion of the site inspection. As such, the summary of preliminary findings detailed in the closeout meeting did not cover all findings associated with the audit.

2.3 Task 3 Draft IEA Report

During the site visit, and as required following the site visit, the audit team conducted a review of the key documentation provided. Each requirement within the audit compliance tables were reviewed and evidence gathered to support an assessment of compliance. Whilst personal communication does provide valuable input into this process it was not be relied upon as verification of compliance.

An assessment of environmental performance was undertaken and reported in the audit report where issues were identified. A review of the Construction Environmental Management Plan and associated sub plans were undertaken, and a summary provided in the audit report.

A single consolidated report was prepared (this report), with separate audit checklists appended to address each of the approval instruments.

2.4 Task 4 Finalise IEA Report

Following receipt of consolidated comments from ARTC, RPS updated and finalised the IEA Report and reissued for ARTC to submit to the Department via the Major Project website.

2.5 Scope Development

The IEA was undertaken in general accordance with:

- The Department's Post-approval requirements for State Significant Developments Independent Audit Guideline, May 2020 (Independent Audit Guideline, 2020).
- AS/NZS ISO 19011:2018 Guidelines for auditing management systems.
- RPS's proposal (dated 11 September 2020).

2.6 Consultation

As per Condition A36 of Instrument of Approval SSI 7474, Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020). The Independent Audit Post Approval Requirements (May, 2020) requires the auditor, prior to the commencement of the site inspection, to contact each of the key agencies with a role in regulating the development to obtain their feedback and draw the auditor's attention to any key issues, within the agreed scope of the audit. **Table 1** below provides a summary of the regulatory agencies which were sent feedback requests on to 17 June 2022 DPE and on 28 April 2022 to other stakeholders as well as the status of any responses received.

Table 1 Regulator Response Summary

Regulatory Agency	Response Received	Date Received
Department of Planning, Industry and Environment	No	-
NSW Environment Protection Authority	Yes – general comment	31 May 2022
Biodiversity, Conservation and Science Directorate	Yes	13 May 2022
Transport for NSW	No	-
Heritage NSW	Yes – general comment	31 May 2022
Gwydir Shire Council	No	-
Moree Plains Shire Council	No	-
Narrabri Shire Council	Yes	13 May 2022

Note: No responses were received from other agencies or organisations, and there is no community consultative committee for this project currently.

A summary of comments received from the regulatory agencies as well as responses to regulator consultation is provided in **Appendix C**.

2.7 Site Inspection

A two (2) day site inspection was conducted on 2 and 3 August 2022. During the site inspection the weather conditions were generally fine and sunny with the daytime temperature ranging from approx. 8°C to 24 °C. Minor rainfall was recorded in the three days prior to the site inspection with the sites inspected still displaying significantly hydrated soils. The following sites were visited during the site inspection:

- Pad 6
- Pennys Lane
- Bellata Creek
- Myall Hollow
- Bellata Station
- Milly Road North
- Gate 7
- Spring Creek
- Bobbiwaa Bridge
- 10 Mile Creek
- Gurley Bridge
- Yallaroi Creek and Laydowns
- Croppa Creek
- Milguy Culverts

Photographs from the audit site inspection supporting audit findings are provided in **Appendix C**.

2.7.1 Opening and Closing Meetings

In accordance with ISO 19011:2018 Guidelines for auditing management systems an opening and closing meeting was held during the Audit kick off meeting and site inspection. Details of attendees at both meetings are included in the sign on sheets included in **Appendix D**.

2.8 Compliance Status

The compliance status was determined using the relevant descriptors in accordance with the Independent Audit Post Approval Requirements (the Department, May 2020) provided in **Table 2** below.

Table 2 Compliance Status Descriptors

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.

Previous audit descriptors of partial compliance, partial non-compliance, not verified or administrative non-compliance or other similar terms must not be used in accordance with the above requirements.

As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in **Table 2**.

2.9 Evidence Validation

The audit team undertook verification activities to confirm the reliability of audit evidence. This included interviews, data checking, the examination of records, and site inspections. Records were provided in electronic and/or hard copy by site personnel and additional documents were reviewed whilst on site.

Some aspects of the audit process may have relied on information such as judgements and assumptions where external supporting evidence was unavailable or limited. Where this information was considered, its validity was confirmed to the extent possible prior to use by the auditors and is noted in appropriate areas of the audit checklists.

The majority of information was assessed off-site prior to the site inspection. The site inspections concentrated on assessment of the effectiveness of environmental management and adequacy of performance. The extent of audit activities was limited to the time available for the audit site inspections and interviews over two (2) days.

3 ENVIRONMENTAL MANAGEMENT

A detailed implementation review was conducted against each management plan condition in SSI 7474 and can be found in the Project Approval audit checklist in **Appendix B**. The approved strategies, plans or programs required under SSI 7474 including a brief summary of the implementation review conducted against each plan are summarised in **Table 3** below.

Following review of the CEMP and associated Sub-Plans it was noted that there were a number of inconsistencies between the revisions available on the project website and those being utilised by ARTC and Trans4m. A review of the project website documentation should be undertaken to ensure CEMP and associated Sub-Plans available are the most up to date revisions as approved by the Secretary.

Table 3 Management Plan Implementation Review

Document	Findings from Review
Construction Environmental Management Plan (CEMP)	<p>Construction Traffic, Transport and Access Management Sub-Plan 5-0018-260-PES-00-PL-0003 Revision: 2 Issued: 21/04/2022 Approved by Grant Brown as nominee of the Planning Secretary on 18/05/2022.</p> <p>The CEMP was updated during the audit period to include the Construction Ancillary Facilities approved in the SEMP, an assessment and approval mechanism for Construction and Minor Ancillary Facilities (under CoA A16 and A21, respectively), comments from ARTC, DPIE and the ER and various other administrative changes.</p> <p>The CEMP was observed to be prepared in accordance with C2 and the Department's Environmental Management Plan Guideline for Infrastructure Projects (DPIE, 2020). ARTC were observed to be implementing the CEMP through regular inspections, incident reporting, and non-compliance rectification.</p>
Construction Soil and Water Management Sub-Plan	<p>Construction Soil and Water Management Sub-Plan 5-0018-260-PES-00-PL-0002 Revision: 1 Issued: 26/10/2021 Approved by Jake Shackleton as nominee of the Planning Secretary on 24/11/2021.</p> <p>Section 5 of the SWMP outlines the draft water balance, construction water requirements, and mitigation measures to address construction water resource shortages that arise.</p> <p>ARTC and Trans4m have generally implemented the SWMP during the audit period to manage sediment erosion and protect waterways.</p> <p>Several temporary soil stockpiles were observed to not be managed in accordance with the site-specific Erosion and Sediment Control Plan during the site inspection.</p> <p>The design and construction of drainage crossings and piling pads, particularly those inspected during the previous audit have improved but has still resulted in some minor erosion and sedimentation of creek lines and drainage over recent rain events. Evidence of partially blocked pipes noted in some crossings.</p> <p>Batters along the rail corridor works, observed appeared to be generally maintained and were an improvement from the previous audit site inspection.</p> <p>Material tracking was noted onto the Newell Highway from works sites. It was noted that a dedicated street sweeper is utilised to remove tracked material. However, due to the length of the project there is significant distance for the street sweeper to cover.</p>
Construction Traffic, Transport and Access Management Plan	<p>Construction Traffic, Transport and Access Management Plan 5-0018-260-PES-00-PL-0003 Revision 2 Issued: 21/04/2022 Approved by Grant Brown as nominee of the Planning Secretary on 18/05/2022</p> <p>The CTTAMP was updated during the audit period because of the project moving into Stage 1. The CTTAMP addresses the relevant requirements of the Project Approval and all applicable guidelines and standards specific to traffic and transport</p>

Document	Findings from Review
	<p>during the Project. The CTTAMP also outlines the potential traffic and access impacts likely to be experienced during the construction phase of the Project. Review of the complaints register and access agreements during the audit period indicated that ARTC are implementing measures to maintain pedestrian and vehicular access to affected properties. Impacts on seasonal traffic, including harvest-related vehicles, and public transport were observed to be minimised during the audit period.</p>
<p>Construction Noise and Vibration Management Sub-Plan</p>	<p>Construction Noise and Vibration Management Sub-Plan 5-0018-260-PES-00-PL-0005 Revision: 1 Issued: 18/08/2021 Approved by Jake Shackleton as nominee of the Planning Secretary on 01/10/2021. Works were observed to be undertaken within the hours stipulated in this condition during the site inspection. It is noted that a number of OOHW applications have been implemented to allow Sunday and PH works in Edgeroi, Bellata and North Star under E3(c) and T4MR's EPL condition L6.3 during the audit period. Review of monitoring data indicated that ARTC have complied with relevant noise and vibration regulatory requirements during the audit period and have maintained positive and cooperative relationships with local communities. All noise and vibration complaints were addressed in a timely and efficient manner. There have been multiple agreements negotiated with sensitive receivers during the audit period with a number of agreements still awaiting formal written approval. ARTC were observed to be generally implementing the CNVMP during the audit period.</p>
<p>Construction Biodiversity Management Sub-Plan</p>	<p>Construction Biodiversity Management Sub-Plan 5-0018-260-PES-00-PL-0005 Revision: 3 Issued: 06/01/2022 Approved by Matthew Todd-Jones as nominee of the Planning Secretary on 10/01/2022. Revision 3 of the BMP included:</p> <ul style="list-style-type: none"> • an update to address the recent unexpected finds of the Five Claw Worm Skink. • a protocol (including a flow chart) to be implemented on an encounter with a Five Claw Worm Skink. • a description of additional mitigation measures and surveys to be implemented. • commitments to informing the BCS and DAWE within 48 hours of a Five Claw Worm Skink encounter. <p>An updated version of the Construction Biodiversity Management Sub-Plan was approved by DPE (formerly DPIE) on 10 January 2022. The approval letter (contained in the BMP) states that the BMP will need to be reviewed prior to Stage 1 works commencing in order to include updates relevant to that section of the project. Stage 1 works occurred in early April 2022.</p> <p>ARTC sent a memo and request to BCS on 21 February 2022 confirming that the memo would be prepared outlining the proposed works and measures to be implemented to mitigate potential impacts to the FCWS in the interim. BCS replied on 22 March 2022 outlining that BCS did not object to early works commencing in the Stage 1 component of the project in the absence of an updated Biodiversity Management Plan (BMP) and Species Management Plan. BCS did expect that relevant components of the approved BMP would continue to be implemented in the interim period.</p> <p>Reports for pre-clearing surveys prepared by Geolink Environmental Management and Design were sighted during the audit. Records of fauna capture/relocation are maintained in a register for the project. Procedures for pre-clearing surveys for threatened species to be undertaken by a suitably qualified and experienced ecologist, including survey and relocation methodologies and management/offset measures were noted to be implemented. During the site inspection it was noted that further efforts should be implemented to manage weeds in accordance with the weed management plan in Appendix E.</p> <p>Review of incidents and interview with Geolink during the site inspection indicated that ARTC are implementing the Five-clawed Worm-skink Encounter Procedure contained in Appendix I of the BMP. Evidence was also sighted of Trans4m</p>

Document	Findings from Review
Construction Flood Emergency Management Sub-Plan	<p>implementing the TARP and other koala management measures during the audit period following the location of a Koala within a clearing area.</p> <p>Construction Flood Emergency Management Sub-Plan 5-0018-260-PES-00-PL-0007 Revision: 1 Issued: 20/07/2021 Approved by Matthew Todd-Jones as nominee of the Planning Secretary.</p> <p>The FEMP was observed to include measures for managing flood risks during construction and address flood recovery. ARTC and Trans4m were observed to be implementing the FEMP during the audit period by ensuring sites are suitably prepared prior to events and undertaking effective flood risk identification and evaluation. Evidence was observed during the site inspection that these measures are identified during the daily site diaries and in the weekly Environmental and Sustainability Checklist (PPW). Proactive measures were also noted during the site inspection with regular weather monitoring and communication to the wider project team.</p>
Construction Heritage Management Sub-Plan	<p>Construction Heritage Management Sub-Plan 5-0018-260-PES-00-PL-0008 Revision: 1 Issued: 08/06/2021 Approved by Jake Shackleton as nominee of the Planning Secretary on 17/06/2021.</p> <p>Review of available documentation and interviews with staff on site indicated that project staff have an awareness of Aboriginal and non- Aboriginal heritage values for the project through the induction process, regular training events, and targeted training and toolbox talks.</p> <p>Appropriate controls and procedures were observed to implemented during construction activities to avoid or minimise potential adverse impacts to Aboriginal and non-Aboriginal heritage inside or outside the construction footprint and included fencing and detailed mapping. The CIZ was generally delineated with the use of barrier tape and signage. Site inspections of construction areas identified that no disturbance had occurred outside the delineated construction areas during construction works.</p> <p>Ongoing consultation with relevant agencies and groups, as specified in the CoA and HMP was observed during the audit period. No human remains were found during the audit period. ARTC and Trans4m have generally implemented the HMP and relevant CoA heritage conditions during the audit period.</p>
Narrabri to North Star Phase 1 Communication Strategy	<p>Communication Strategy (5-0000-260-PCS-00-ST-0001_D) Revision 2 – 20/01/2021</p> <p>The communication strategy was observed to be generally implemented during the audit period with the identified people, organisations and government authorities adequately and proactively consulted during the audit period. Evidence was sighted of regular, inclusive and accessible information regarding construction activities, schedules and milestones.</p> <p>A 24-hour toll-free telephone number, postal and email addresses, and regular, location-based community forums across the project alignment is currently in place. Evidence of communication between Inland Rail, and the community and government authorities – including relevant councils (Narrabri Shire Council, Moree Plains Shire Council, Gwydir Shire Council), government agencies, and adjoining affected landowners and businesses was observed during the site inspection and following review of available documentation.</p>

4 ENVIRONMENTAL PERFORMANCE

This section assesses the requirement to assess the environmental performance of the project and whether it is complying with the relevant requirements the Project Approval SSI 7474, including any assessment, plan or program required under the approval. RPS based the assessment of the environmental performance of the site on the following:

- Section 3 provides an assessment of the effectiveness and adequacy of the environmental management plans and programs required under SSI 7474.
- An assessment of compliance with the conditions of SSI 7474. The findings of this assessment are provided in the compliance checklists presented in Appendix B with the identified non-compliances and associated recommendations summarised in the Audit Findings in Section 5.
- Section 4.1 provides a review of compliance management practices in place for the Project.
- Section 4.2 provides a review of incidents reported during the audit period.
- Section 4.3 provides a review of complaints received during the audit period.

4.1 Compliance Management

4.1.1 Compliance Monitoring

Trans4m Rail utilises John Holland Group's Environmental Management System (EMS) (which is certified to ISO AS/NZS14001) to ensure compliance with the Project Approval SSI 7474 environmental performance objectives. The EMS is part of an Integrated Management System (IMS) which contains policies, standards, manuals, plans, procedures, processes and other key documents that enable both the overall organisation and operations to achieve their objectives through planned and controlled processes.

CoA C14 requires that Construction Monitoring Programs must be developed and implemented for the following issues:

- Noise and Vibration Monitoring Program; as per Section 11 and Appendix E of the Construction Noise and Vibration Management Sub-Plan (CNVMP);
- Water Usage Monitoring Program; as per Section 7.2.1 of the Construction Soil and Water Management Sub-Plan (CSWMP);
- Air Quality Monitoring Program; as per Section 7.2.2 and Appendix D of the CSWMP; and
- Physical Condition of local roads Monitoring Program; as per Section 5 of the Construction Traffic, Transport and Access Management Sub-Plan (CTTAMP).

These monitoring programs are contained within the relevant sub-plan. The results of the monitoring programs are submitted to the Planning Secretary, and relevant regulatory agencies, for information in the form of a Construction Monitoring Report at the frequency identified in the relevant Construction Monitoring Program. Managing and reporting of incidents and non-compliances is undertaken in accordance with Trans4m Rail's Non-conformance and Corrective Action procedure (T4MR-MPRSQE- 007).

As required under CoA C20, the 6 Monthly Construction Monitoring Report was prepared to summarise the results of these Construction Monitoring Programs. The SSI 7474 – 6 Monthly Construction Monitoring Report (October 2021 – April 2022) was issued during the audit period on 26 May 2022.

Event Tracker provides a single management and reporting source for Safety and Environmental events. Event Tracker is the platform used for the notification, reporting and management of all HSE incidents and corrective actions, including non-conformances, WHSE Statistics management with a holistic approach to managing audits and inspections.

4.1.2 Environmental Representative

In accordance with Condition A24 of SSI 7474, WolfPeak was approved as the Project's Environmental Representatives (ER) by the Department on 13 October 2020. Condition A28(j) of SSI 7474 requires that for the duration of the works until 12 months after the completion of construction, the approved ER must 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) calendar days following the end of each month for the duration of the ER's engagement for the CSSI.

A request was submitted to DPE for an additional alternative ER to be included on the project. Alternative ER Peter Hatton was approved by Grant Brown as nominee of the Secretary on 22 April 2022.

4.2 Incidents

Multiple incidents were recorded by ARTC during the audit period and were either determined to be reportable or non-reportable to DPE as identified through the CEMP and relevant sub-plans.

February 2022

- One negligible environmental incident concerning the overtopping of Croppa Creek Tributary and Buckie Road level crossing (reported to DPE)
- One minor environmental incident concerning a concrete spill on County Boundary Road (reported to DPE and EPA)
- Two unexpected FCWS finds reported to DPE and DAWE
- One non-reportable negligible environmental incident concerning an oil spill at the Coolearlee Siding
- One non reportable negligible environmental incident concerning a hydraulic spill on Wongabindi-Roydon Road

March 2022

- One environmental incident concerning the overtopping of Culvert 705 near Milguy (negligible impact / reported to DPE)
- One Potential Heritage Unexpected Find at CH604.51 (near miss / not reportable)
- One FCWS fatality at CH613.3 (reported to DPE & DAWE)
- One minor oil spill at CH700.93 (negligible environmental impact / not reported)
- One FCWS relocation at CH609.45 (reported to DAWE)
- Unlined concrete washout pits found at CH716.23 & 755.23 (negligible environmental impact / not reported)

April 2022

- Five FCWS relocation events between 602.95 and 629.85 (reportable to DAWE)
- One FCWS fatality at CH628.55 (reported to DPE & DAWE)
- One concrete wash out at Croppa Creek Bridge (negligible environmental impact / not reported)

May 2022

- Five FCWS fatality / relocation events between 612.13 and 616.05 (reportable to DAWE and DPE)
- Two minor hydraulic oil and one minor grease spill events (not reportable)

June 2022

- Minor diesel spill while refuelling
- Minor hydraulic oil spill
- Non-conformance with dewatering permit at Bellata culvert under EPL
- Two minor hydraulic oil and one minor grease spill events (not reportable)

July 2022

- Diesel leak from the fuel tank of water cart at CH 599.79

- Fuel and hydraulic oil loss from Overturned vehicle at Milguy
- Hydraulic oil spill at Gurley Settlers Rd
- Koala sighting at LX922, County Boundary Rd

4.3 Complaints

The Narrabri to North Star Phase 1 Communication Strategy (5-0000-260-PCS-00-ST-0001_D) has been developed to support communication and engagement during the development, preconstruction, and construction of the N2NS Phase 1 project and for six (6) months following the completion of construction. ARTC operate a 24-hour toll-free telephone complaints number, postal and email addresses for enquiries located on the Project website <https://inlandrail.artc.com.au/where-we-go/projects/narrabri-to-north-star/contact/>.

There was a total of fifty-three (53) complaints received by ARTC during the audit period.

February 2022 (within audit period)

- There were eight (8) complaints were recorded during February related to weed management, traffic/access, dust, and level crossings.

March 2022

- There were seven (7) complaints were recorded during March related to traffic/access, communications, worker behaviour, project design.

April 2022

- There were fifteen (15) complaints were recorded during April related to traffic/access, noise/vibration, and dust.

May 2022

- There were four (4) complaints were recorded during May related to flood mitigation and traffic/access.

June 2022

- There were thirteen (13) complaints were recorded during February related to traffic/access, flooding, noise, and worker behaviour.

July 2022

- There were six (6) complaints were recorded during July related to drainage works, fencing/access, water management, survey, and worker behaviour.

5 RESPONSE TO PREVIOUS AUDIT FINDINGS

A review was conducted against the recommendations made in the IEA Audit 2 conducted by RPS for the period 13 July 2021 to 9 February 2022. The findings from this review have been provided in **Appendix D**.

6 AUDIT FINDINGS

The findings of the IEA compliance assessment are presented in this section.

A summary of compliance against the sites Project Approval is provided in **Table 4** below. The non-compliances and corresponding recommendations are summarised in Section 5.1 and detailed in **Appendix B**.

Table 4 Summary of Audit Findings

Approval	Total No. of Conditions	Compliant	Non-Compliant	Not Triggered
SSI 7474	170	104	2	64

6.1 Identified Non-Compliances and Recommendations

Non-Compliances identified against SSI 7474 have been summarised in **Table 6** below. Further audit commentary and evidence is provided against each condition in the SSI 7474 N2NS Phase 1 Audit 2 Checklist provided in **Appendix B**.

Table 5 Non-Compliances against SSI 7474

Cond Ref	Requirement	Independent Audit Finding	Recommendation
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 E80 – Erosion and sediment controls <p>Refer to the specific IEA comments and evidence for each non-compliant condition listed above.</p>	No recommendation required for non-compliance. Refer to the specific IEA comments, evidence, and recommendations for each non-compliant condition.

Cond Ref	Requirement	Independent Audit Finding	Recommendation
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-SP1).</p> <p>Several temporary soil stockpiles were observed to not be managed in accordance with the site-specific Erosion and Sediment Control Plan during the site inspection.</p> <p>The design and construction of drainage crossings and piling pads, particularly those inspected during the previous audit have improved but has still resulted in some minor erosion and sedimentation of creek lines and drainage over recent rain events. Evidence of partially blocked pipes noted in some crossings.</p> <p>Batters along the rail corridor works, observed appeared to be generally maintained and were an improvement from the previous audit site inspection.</p> <p>Material tracking was noted onto the Newell Highway from works sites. It was noted that a dedicated street sweeper is utilised to remove tracked material. However, due to the length of the project there is significant distance for the street sweeper to cover.</p> <p>Unlined and uncontained concrete spills noted within the piling pad at Bobbiwaa Bridge.</p>	<p>Ensure all reasonably practicable erosion and sediment controls must be installed and appropriately maintained to minimise any water pollution.</p> <p>Ensure regular cleaning of drainage structures and erosion and sediment control structures is undertaken prior to and following significant rain events.</p> <p>Ensure temporary stockpiles are adequately stabilised, located, and managed in accordance with the ESCP.</p> <p>Ensure temporary batters are appropriately stabilised to reduce the risk of erosion until the final design shaping and rehabilitation is implemented.</p> <p>Consider further mitigation measures, such as rumble grids, to reduce material tracking onto the Newell Highway.</p> <p>Ensure appropriate concrete washout pits are installed as required and all excess concrete spills are removed immediately following the spill event during piling works.</p>

6.2 Summary of Opportunities for Improvement

Table 7 below outlines the opportunities for improvement (OFI) identified during the audit. The OFIs detailed below are based around continuous improvement opportunities identified during the audit and do not represent immediate non-compliance issues.

Table 6 Summary of Opportunities for Improvement

OFI Ref	Cond Ref	Context	Opportunities for Improvement
OFI1	A4	An updated version of the Construction Biodiversity Management Sub-Plan was approved by DPE (formerly DPIE) on 10 January 2022. The approval letter (contained in the BMP) states that the BMP will need to be reviewed prior to Stage 1 works commencing in order to include updates relevant to that section of the project. Stage 1 works commenced in early April 2022 and the Revision 4 of the BMP has not been approved during the audit period. RPS sighted the revised Species Management Plan Rev 1 dated 12 August 2022 in response to BCS and ER comments.	Ensure that Revision 4 of the BMP is approved and the SMP is attached.
OFI2	A6	Any document that must be submitted, or approval that must be obtained, within a timeframe specified in or under the conditions of this approval may be submitted within a later timeframe agreed with the Planning Secretary.	Recommended that approval letters for all management plans and reports be attached as appendix items to demonstrate compliance status.
OFI3	C9	The Biodiversity Management Sub-plan must include: <ol style="list-style-type: none"> a weed management plan, including appropriate weed control to manage introduction and/or spread of weeds from construction areas to any retained Weeping Myall Woodlands TEC, and appropriate protocols to demonstrate compliance with the requirements of the Biosecurity Act 2015 and Biosecurity Regulation 2017 	Weed management could be improved around crossings and should be reviewed as the timing of the project enters spring.
OFI4	E28	Flood Design Verification Report	Attach the Department approval letter of the FDVR in Appendix.
OFI5	E35	A number of overtopping events have been recorded during the audit period. While overtopping events have been reported, the piling pads were constructed to the meet design criteria for the nominated rainfall event. Overtopping events exceeded the approved design rainfall and runoff volume in each case. It is noted that most of the piling works are complete or near completion.	It is recommended that the hydraulic model is continued to be reviewed considering the observations and data obtained during recent rain events.
OFI7	E65	Incident EVT-0000168 - CH740.500 & CH740.200_South of Yallaroi Creek_ ARTC's Heritage Consultant potentially salvaged items outside the SPIR CIZ.	Continue to implement the key corrective actions from the incident investigation. Continue to protect scare and survey trees and where possible relocated CIZ or access points to avoid tree drip zones or APZs.
OFI6	E80	It is noted that multiple incidents of spills of fuels, oils and concrete washouts were reported during the audit period. Although these incidents reported were of a minor nature, and were cleaned up, this indicates some potential systemic problems with respect to the management of these activities.	It is recommended that site personnel and contractors are reminded of appropriate control measures to minimise the potential for spills or releases of fuels, oils and other liquids. It is also recommended that the establishment and use of concrete wash out pits is reviewed to ensure that these are appropriately managed and contained.

REPORT

OFI Ref	Cond Ref	Context	Opportunities for Improvement
OF17	E87	<p>Waste and Resource ECM has been developed to manage the waste and resource recovery related risks on this Project.</p> <p>General housekeeping and waste segregation and storage was observed to be poor at the Yallaroi Laydown area with several temporary stockpiles contaminated with foreign materials and rubbish not segregated and contained within formalised waste bins.</p> <p>Evidence supplied of waste and recycling reports issued to ARTC monthly by Cleanaway during the audit period. The report outlines volumes and waste streams recorded during each month. The monthly reports outline landfill and diversion percentages along with month on month comparisons.</p>	<p>Ensure waste segregation is followed on site to limit cross contamination of bins and stockpiles.</p> <p>Ensure regular inspections are undertaken following completion of milestones on all areas of the project.</p> <p>Waste tracking information should be provided by third party suppliers on a regular basis to the project team to ensure compliance with this condition.</p>



Appendix A
Planning Secretary Audit
Team Approval



Mr Sam Blanco
Senior Environmental Advisor
Australian Rail Track Corporation Ltd
Level 16
180 Ann Street
Brisbane Queensland 4000

03/02/2021

Dear Mr Blanco

**Inland Rail - Narrabri to North Star Phase 1 (SSI-7474)
Independent Auditor Approval**

I refer to your request (SSI-7474-PA-12) for the Secretary's approval of suitably qualified persons to prepare an independent audit for the Inland Rail – Narrabri to North Star Phase 1 (SSI-7474), in accordance with Schedule 2, Condition A35 of the approval.

The Department has reviewed the alternate nominations you have provided and is satisfied that proposed audit team is suitably qualified and experienced. Consequently, I can advise that the Secretary approves the appointment of the following proposed audit team:

- Mr Ian Richardson, RPS Group – Lead Auditor; and
- Ms Belinda Bock, RPS Group - Assistant Auditor.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements (2020). Failure to meet these requirements will require revision and resubmission.

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

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Angie Hollister on 02 6670 8654.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Shelley McPhee'. The signature is fluid and cursive, with the first name 'Shelley' written in a larger, more prominent script than the last name 'McPhee'.

Shelley McPhee
Compliance Team Leader
Compliance

As nominee of the Planning Secretary



Mr Jason Ellerby
Level 16
180 Ann Street
Brisbane Queensland 4000

20/07/2021

Dear Jason Ellerby

**Narrabri to North Star (SSI-7474)
New Support Auditors Approval**

I refer to your request (SSI-7474-PA-53) for the Secretary's approval regarding the new support auditor for the preparation of the Narrabri to North Star Independent Audit (SSI-7474).

The Department has reviewed the nomination and information you have provided and is satisfied that Mr Sam Mitchell is suitably qualified and experienced as support auditor. Consequently, I can advise that the Secretary approves the appointment of Sam Mitchell to assist in the preparation of the Independent Audit.

In accordance with Schedule 2, Part A, Condition A35 of SSI-7474 (the 'Consent') and the Independent Audit Post Approval Requirements, the Secretary has agreed to the following audit team:

- (Lead Auditor) Mr Ian Richardson; and
- (Support Auditor) Mr Sam Mitchell.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Audit must be prepared, undertaken and finalised in accordance with the Independent Audit Post Approval Requirements. Failure to meet these requirements will require revision and resubmission.

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

Notwithstanding the agreement for the above listed audit team for this Project, each respective project approval or consent requires a request for the agreement to the auditor or audit team be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

If you wish to discuss the matter further, please contact Phillip Rose on (02) 6670 8657.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Angie Hollister', written in a cursive style.

Angie Hollister
A/Team Leader
Compliance

As nominee of the Planning Secretary



Ms Tina Stewart
Level 15, 60 Carrington Street
Sydney NSW 2000

07/12/2021

Dear Ms Stewart

**Narrabri to North Star - Extension Request for Second IEA (SSI-7474)
Extension of Time to Undertake IEA Inspection and Submit Report**

I refer to your request (SSI-7474-PA-110) for an extension of time for the independent environmental audit (IEA) inspection and report submission as required under the conditions of approval for the Inland Rail Narrabri to North Star project (SSI-7474).

The Department notes the following factors justifying this request include:

- considering the upcoming Christmas / New Year holiday period, ARTC had agreed with the Independent Auditor to commence the second audit on the 7 December 2021
- an audit planning meeting was held on the 29 November 2021 between ARTC and the Independent Auditor
- current and ongoing flooding in the area
- ongoing and evolving COVID-19 risk in the regional Moree township,
- the desktop component of the audit would commence on the 7 December 2021 as planned; and
- the field component would be completed on the 18 and 19 January 2022.

Accordingly, the Planning Secretary has granted an extension of time until 18 March 2022 for the submission of the second IEA.

If you wish to discuss the matter further, please contact Shelley McPhee on 02 6670 8675.

Yours sincerely

APPROVERSIGNATUREANDDETAILSWILLBEINSERTEDHERE

As nominee of the Planning Secretary



Appendix B
SSI 7474 IEA Audit
Checklist

SSI 7474 N2NS PHASE 1 IEA – AUDIT 3 CHECKLIST

SCHEDULE 2	2
PART A - ADMINISTRATIVE CONDITIONS	2
GENERAL	2
INDEPENDENT APPOINTMENTS	6
STAGING	6
ANCILLARY FACILITIES	8
SITE ESTABLISHMENT WORKS	9
ENVIRONMENT REPRESENTATIVE	15
COMPLIANCE REPORTING REQUIREMENTS	18
AUDITING	19
INCIDENT REPORTING AND NOTIFICATION	21
PART B - COMMUNITY INFORMATION AND REPORTING	21
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT	21
COMPLAINTS MANAGEMENT SYSTEM	23
PROVISION OF ELECTRONIC INFORMATION	25
PART C - CONSTRUCTION ENVIRONMENTAL MANAGEMENT	26
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN	26
CONSTRUCTION MONITORING PROGRAMS	34
PART D - OPERATIONAL ENVIRONMENTAL MANAGEMENT	36
OPERATIONAL ENVIRONMENTAL MANAGEMENT	36
PART E - KEY ISSUE CONDITIONS	37
NOISE AND VIBRATION	37
BIODIVERSITY	47
FLOODING	53
WATER QUALITY AND DRAINAGE	60
TRAFFIC, TRANSPORT AND ACCESS	62
SPOIL MOUNDS	72
VISUAL AMENITY	73
HERITAGE	75
LAND USE AND PROPERTY	79
SUSTAINABILITY	80
SOILS	80
AIR QUALITY	83
WASTE	83
Appendix B – WRITTEN INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS	86

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
SCHEDULE 2				
PART A - ADMINISTRATIVE CONDITIONS				
GENERAL				
A1	<p>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>	<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 • E80 – Erosion and sediment controls <p>Refer to the specific IEA comments and evidence for each non-compliant condition listed above.</p>	Non-compliant	<p>No recommendation required for non-compliance. Refer to the specific IEA comments, evidence, and recommendations for each non-compliant condition.</p>

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
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.	Non-compliant	As above.
A3	In the event of an inconsistency between the documents listed in Condition A1 or any other document required under this approval, and a term of this approval, the term of this approval prevails 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.	Inconsistency between the documents listed in Condition A1 or any other document required under this approval were not observed during the audit period.	Compliant	
A4	The Proponent must comply with the written requirements or directions of the Planning Secretary, including in relation to: <ul style="list-style-type: none"> a. the environmental performance of the CSSI; b. any document or correspondence under the terms of this approval in relation to the CSSI (including the provision of such documentation or correspondence); c. any independent appointment or dismissal made in relation to the CSSI; d. any notification given to the Planning Secretary under the terms of this approval; e. any audit of the construction or operation of the CSSI; f. the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); g. the carrying out of any additional monitoring or mitigation measures; and h. 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. 	<p>Review of correspondence indicates that ARTC has generally complied with the written requirements and/or directions of the Planning Secretary during the audit period.</p> <p>DPE letter received 17/03/2022 confirming approval of Revision 1 of the CEMP dated 2/03/2022.</p> <p>Construction Traffic, Transport and Access Management Sub-Plan 5-0018-260-PES-00-PL-0003 Revision: 2 Issued: 21/04/2022 Approved by Grant Brown as nominee of the Planning Secretary on 18/05/2022</p> <p>An updated version of the Construction Biodiversity Management Sub-Plan was approved by DPE (formerly DPIE) on 10 January 2022. The approval letter (contained in the BMP) states that the BMP will need to be reviewed prior to Stage 1</p>	Compliant	Ensure that Revision 4 of the BMP is approved and the SMP is attached.

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>works commencing in order to include updates relevant to that section of the project. Stage 1 works commenced in early April 2022 and the Revision 4 of the BMP has not been approved during the audit period. RPS sighted the revised Species Management Plan Rev 1 dated 12 August 2022 in response to BCS and ER comments.</p> <p>ARTC sent a memo and request to BCS on 21 February 2022 confirming that the memo would be prepared outlining the proposed works and measures to be implemented to mitigate potential impacts to the FCWS in the interim. BCS replied on 22 March 2022 outlining that BCS did not object to early works commencing in the Stage 1 component of the project in the absence of an updated Biodiversity Management Plan (BMP) and Species Management Plan. BCS did expect that relevant components of the approved BMP would continue to be implemented in the interim period.</p>		
A5	<p>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 in accordance with the Department's Post Approval Guidance: Defining Engagement Terms (DPIE, 2020). The evidence must include:</p> <ul style="list-style-type: none"> 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; 	<p>DPE letter received 17/03/2022 confirming approval of Revision 1 of the CEMP dated 2/03/2022.</p> <p>DPE letter received 10/01/22 confirming approval of the Construction Biodiversity Management Sub Plan Revision 3, dated 06 January 2022.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> c. documentation of the follow-up with the identified party where engagement has not occurred to confirm that they do not wish to engage or have not attempted to engage after repeated invitations; d. outline of the issues raised by the identified party and how they have been addressed; and e. a description of the outstanding issues raised by the identified party and the reasons why they have not been addressed. 			
A6	<p>Any document that must be submitted, or approval that must be obtained, within a timeframe specified in or under the conditions of this approval may be submitted within a later timeframe agreed with the Planning Secretary. This condition does not apply to the immediate written notification required in respect of an incident under Condition A41. The Proponent must provide supporting evidence so that the Secretary can consider the need, environmental impacts and consistency of any request.</p> <p><i>Note: Inaction and/or expedience will not be supported as justifications for need unless it can be demonstrated that there are beneficial environmental impacts associated with the request.</i></p>	<p>All documents sighted during the audit period were observed to have been submitted within the required timeframes specified under the conditions.</p> <p>A number of other extensions were requested during the audit period and are outlined in the relevant conditions of consent.</p>	Compliant	Recommended that approval letters for all management plans and reports be attached as appendix items to demonstrate compliance status.
A7	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Standards or policies in the form they are in as at the date of this approval.	Noted.	Not triggered	
A8	This approval lapses five (5) years after the date on which it is granted, unless works for the purpose of the CSSI are physically commenced on or before that date.	Noted. Evidence of substantial physical works commencing.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
INDEPENDENT APPOINTMENTS				
A9	All Independent Appointments required by this approval must be in accordance with the Department's guideline Seeking approval from the Department for the appointment of independent experts (DPIE, 2020).	Letter (DPIE, 03/02/2021) to ARTC noting independent auditor approval of Ian Richardson and Belinda Bock (RPS). Subsequent approval of replacement support auditor Sam Mitchell was received 20/07/2021. Letter (DPIE, 13/10/2020) to ARTC noting approval of Environment Representative Mr Fermio, Mr Low, and Mr Johan. Alternative ER Peter Hatton approved by Grant Brown as nominee of the Secretary on 22/04/2022.	Compliant	
A10	The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must: <ul style="list-style-type: none"> 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. The Planning Secretary may dismiss an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval.	No audit of how an Independent Appointment has exercised their functions has been requested by the Planning Secretary during the audit period.	Not triggered	
STAGING				
A11	The CSSI may be constructed and operated in stages. Where staged construction or operation is proposed, a Staging Report (for either or both construction and operation as the case requires) must be prepared and submitted to the Secretary for approval. The Staging Report must be submitted to the Secretary no later than one (1) month prior to the commencement of construction of the first of the proposed stages of construction (or if only staged operation is proposed, one (1) month prior to the commencement of operation of the first of the proposed stages of operation).	There have not been any updates to the Operational Staging Report (5-0000-260-EEC-00-RP-0001), or new staging reports required during the audit period. The first track possession period for the section of rail between Penny's Road and Tapscott Road level crossing ends on 31 October 2021, and ARTC is required to return the rail track back to its operating state to allow grain from this year's harvest	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>season to be hauled to customers between 1 November 2021 and 30 March 2022. During this period, passenger services will also recommence.</p> <p>At the end of this period, from the 1 April 2022, ARTC is then able to have possession again of the track to further complete the requirements of the N2NS Project up to 30 October 2022.</p> <p>ARTC prepared an Operational Staging Report (5-0000-260-EEC-00-RP-0001) dated 10/09/2021. The report was submitted to DPIE on 1 October 2021 one (1) month prior to the commencement of operation of the first of the proposed stages of operation. The Operational Staging Report was approved by Jake Shackleton as nominee of the Planning Secretary on 27/10/2021.</p>		
A12	<p>The Staging Report must:</p> <ul style="list-style-type: none"> a. if staged construction is proposed, set out how the 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 general details of work and other activities to be carried out in each stage and the general timing of when operation of each stage will commence and finish (if relevant); c. specify how compliance conditions will be achieved across and between each of the stages of the CSSI; and; <p>set out mechanisms for managing any cumulative impacts arising from the proposed staging.</p>	<p>Construction work has generally been undertaken in accordance with the N2NS P1 EIS and the Operational Staging Report (5-0000-260-EEC-00-RP-0001). The Operational Staging Report proposed staged operation to allow grain from this year's harvest season to be hauled to customers between 1 November 2021 and 30 March 2022.</p> <p>Section 3.2 outlines how the operation of the whole of the CSSI will be staged, including general details of work and other activities to be carried out in each stage and the general timing.</p> <p>Section 5 and Appendix A specifies how compliance conditions will be achieved across and between each of the stages of the CSSI.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		Section 4 outlines the mechanisms for managing any cumulative impacts arising from the proposed staging. It is not anticipated that there will be any additional cumulative environmental impacts introduced for this section of track.		
A13	The CSSI must be staged in accordance with the Staging Report, as approved by the Secretary.	CSSI staging is currently being implemented in accordance with the Staging Report.	Compliant	
A14	Where staging is proposed, the terms of this approval that apply or are relevant to the works or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	Compliance with the terms of the approval are outlined in Appendix A of the Operational Staging Report. The approval letter issued by DPIE on 27/10/2021 noted that the Compliance Reporting Requirements under Conditions A31-34 would not be triggered by the interim operation of the CSSI.	Compliant	
A15	Where changes are proposed to the staging of construction or operation, a revised Staging Report must be prepared and submitted to the Secretary for approval no later than one (1) month prior to the proposed change in the staging.	No changes requiring a revised Staging Report to be submitted during the audit period. ARTC have noted that they will provide a revised staging report if there are any changes to the stages outlined within this report within the required timeframes.	Not triggered	
ANCILLARY FACILITIES				
A16	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: <ul style="list-style-type: none"> a. they are located within or immediately adjacent to the construction boundary; and b. they are not located next to a sensitive receiver (including where an access road is between the facility and the receiver), unless the sensitive receiver landowner and occupier have given written acceptance to the carrying out of the relevant facility in the proposed location; and 	SEMP advises Trans4m Rail has utilised the compound locations identified and assessed as part of the N2NS Environmental Impact Statement (EIS) and Submissions Preferred Infrastructure Report (SPIR). CEMP S4.1.1 advises Trans4m Rail's main office complex is located in Moree and will accommodate approximately 140 Trans4m Rail and ARTC staff. Satellite offices will be located approximately 6km south of Bellata and approximately 2.5km north of Croppa	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>c. they have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and</p> <p>the establishment and use of the facility can be carried out and managed within the performance outcomes set out in the terms of this approval, including in relation to environmental impacts.</p>	<p>Creek. An additional site office has been established at Narrabri.</p> <p>Approximately 17 ancillary facilities will be required to construct the project. These satellite offices and construction compounds are contained within the CIZ assessed as part of the EIS and SPIR.</p> <p>In addition, the following Minor Ancillary Facilities (MAFs) were established during the audit period:</p> <ul style="list-style-type: none"> • Calimpa Road • Bobbiwaa Ballast • Bobbiwaa South Caravan • Crooble Ballast • Pennys Road Ballast • Tarlee Caravan • Edgeroi Laydown • Tapscott Road Ballast • Woolabrar Ballast • Yallaroi Lime and Ballast • Mungle Creek • Tackinbri Creek • CH578 Ballast • Tremayne Caravan • Clump Road • Galathera Lane • Waterloo 2 Ballast 		
SITE ESTABLISHMENT WORKS				
A17	<p>Site Establishment Management Plan</p> <p>The Proponent must prepare and submit for approval to the Planning Secretary one (1) month before the establishment of any construction ancillary facility (excluding minor construction</p>	<p>Condition met during the previous audit.</p> <p>The SEMP was received by DPIE 03/02/2021. As confirmed in condition A8,</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>ancillary facilities established under Condition A21) a Site Establishment Management Plan. The Plan must be prepared in consultation with the relevant council/s and TfNSW. The Site Establishment Management Plan must detail the management of the establishment of the construction ancillary facilities and must include:</p> <ul style="list-style-type: none"> a. a description of activities to be undertaken during establishment of the construction ancillary facility (including indicative scheduling and duration of works to be undertaken at the site); b. figures illustrating the proposed operational site layout/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 prior to the commencement of site establishment works; d. details of how the site establishment activities described in subsection (b) of this condition will be carried out to: <ul style="list-style-type: none"> i. meet the performance outcomes stated in the documents listed in Condition A1, and ii. meet the performance outcomes stated in the documents listed in Condition A1, and e. a program for monitoring the performance outcomes, including a program for noise monitoring of site establishment activities. <p>Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each construction ancillary facility or one Site Establishment Management Plan for all facilities. The approved Site Establishment Management Plan(s) must be implemented.</p> <p>Upon commencement of construction, the Site Establishment Management Plan will cease to have effect and the CEMP required by Condition C1 will apply to the operation of ancillary facilities.</p>	<p>more than one month before the start date of construction 10/04/2021.</p> <p>SEMP s2.1 contains a consultation summary, and Appendix B contains consultation records. As required by condition A17 evidence is provided of consultation with Transport for NSW, Narrabri Shire Council, Moree Plains Shire Council; and Gwydir Shire Council in preparation of the SEMP. The SEMP details the management of the establishment of the construction ancillary facilities in s6 and Section 7.3.</p> <p>Evidence: Email submission confirmation received 03/02/2021 from the Department in response to Tran4M request for SEMP review and approval following endorsement by the project Environmental Representative.</p> <p>Inland Rail letter 15/04/2021 EPBC Approval 2016/7729 – Condition 2 Notification, notification of the start of construction.</p> <p>SEMP Rev E 21/02/2021</p> <p>SEMP s6 identifies construction ancillary facilities and site establishment works (including indicative scheduling and duration of works to be undertaken at the site). SEMP s1.1 Figure 1.1 provides a high-level project overview and illustrates the proposed operational site layout. Table 7 and Table 8 have been zoomed in and increased in size to make clearer.</p>		

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>SEMP s11.1 refers to the Environmental Risk Matrix in Appendix C and identifies the environmental risk review to be reviewed and updated on a quarterly basis, prior to the commencement of a key construction stage or as considered necessary by the Trans4M Rail Project Director or Environment Manager.</p> <p>SEMP Table 4 includes the EPOs detailed in Table 27.6 of the EIS and what section they are addressed in the SEMP.</p> <p>SEMP s8.1 Table 9 identifies site establishment management and mitigation measures.</p> <p>SEMP Appendix C contains the Environmental Risk Matrix with indicative management and mitigation measures applicable that apply to all construction activities.</p> <p>The SEMP was prepared to support pre-construction activities associated with the delivery of the project.</p> <p>SEMP Appendix C identifies indicative mitigation measures for potential impacts at set locations, and identifies relevant documents, procedures, training required for each.</p> <p>The SEMP was prepared to support pre-construction activities associated with the delivery of the project. Upon commencement of construction 10/04/2021, the CEMP replaced the SEMP as the key environmental management document for the construction of the project.</p>		

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		Evidence: SEMP rev E 21/02/2021, CEMP rev E 04/02/2021		
A18	Operation of Ancillary Facilities The operation of an ancillary facility for construction must not commence until the CEMP required by Condition C1, relevant CEMP Sub-plans required by Condition 0 and relevant Construction Monitoring Programs required by Condition C14 have been approved by the Planning Secretary.	This condition was met during audit 1 and is not triggered. The CEMP, Sub-plans, and monitoring programs were prepared in consultation with DPIE and approved, CEMP rev E 04/02/2021. Endorsement of these plans was provided in a letter from DPIE dated 7 April 2021. DPE letter received 17/03/2022 confirming approval of Revision 1 of the CEMP dated 2/03/2022.	Not triggered	
A19	Access to Ancillary Facilities Where possible, ancillary facilities must be accessed via existing public roads and/or the existing rail corridor. Access directly via classified roads should be avoided where access from an existing local road is reasonably available. Where access via existing roads or the rail corridor is not possible, the Proponent may utilise existing private access tracks on private property but only with the written permission of the landowner. The Proponent must consult with each landowner whose property is required for access and agree on the terms and conditions relating to access arrangements. Nothing in this condition prevents the landowner from refusing the Proponent access to and via their land. New construction access tracks on private property must comply with the requirements of Condition A16.	Observations made during site inspection indicated that ancillary facilities were accessed via existing public roads and/or the existing rail corridor.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
A20	<p>The Proponent must ensure that all roads / tracks that will be used to access construction ancillary facilities are to the standard necessary to provide access as agreed with landowners and the relevant roads authority, including a trafficable surface suitable to accommodate the type of vehicle movements that are anticipated to be associated with the construction of the CSSI.</p>	<p>The roads / tracks used to access construction ancillary facilities appeared to be of a suitable standard necessary to provide access during the site inspection. Evidence supplied of monthly meetings occurring with Gwydir Shire Council in regard to road maintenance. Active road maintenance was observed to be occurring in consultation with council.</p> <p>Trans4m have a road closure procedure that involves regular inspections of roads following rain events and notification to the project team via text alerts of road closures prior to the start or shifts.</p> <p>This procedure was observed in practise during the audit site inspection.</p>	Compliant	
A21	<p>Minor Ancillary Facilities 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> <ul style="list-style-type: none"> a. are located within the construction boundary; and b. have been assessed by the ER to have – <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 <p>no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.</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>During the audit period the following MAF's have been installed:</p> <ul style="list-style-type: none"> • Calimpa Road • Bobbiwaa Ballast • Bobbiwaa South Caravan • Crooble Ballast • Pennys Road Ballast • Tarlee Caravan • Edgeroi Laydown • Tapscott Road Ballast • Woolabrar Ballast • Yallaroi Lime and Ballast • Mungle Creek 	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<ul style="list-style-type: none"> • Tackinbri Creek • CH578 Ballast • Tremayne Caravan • Clump Road • Galathera Lane • Waterloo 2 Ballast <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>Correspondence with the NSW EPA as part of the audit indicated a number of incidents were recorded during the audit period relating to an EPL premise boundary breach of stockpiles.</p> <p>During the site inspection the auditors all stockpiles were within the SPIR CIZ.</p>		
A22	<p>Boundary Screening</p> <p>Boundary screening must be erected around all ancillary facilities that are adjacent to and visible from sensitive receivers for the duration of use of the ancillary facility unless otherwise agreed with the relevant council and affected residents, business operators or landowners.</p>	<p>Ancillary facilities observed during the site inspection were not located adjacent to sensitive receivers. Ancillary facility checklists reviewed during the audit period demonstrated consideration of visual impacts on surrounding sensitive receivers. Field assessments are undertaken for visual impact to neighbouring sensitive receivers. ATF style fencing and screening was not required to be installed during the audit period.</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
A23	Boundary screening required under Condition A22 of this approval must minimise visual, noise and air quality impacts on adjacent sensitive receivers.	Boundary screening has not been required on any ancillary facilities during the audit period.	Not triggered	
ENVIRONMENT REPRESENTATIVE				
A24	Works must not commence until an ER has been approved by the Planning Secretary and engaged by the Proponent.	Condition not triggered, addressed during previous audit. Letter 13/10/2021 received from DPE for the Approval of Environment Representative: Condition A24 Inland Rail - Narrabri to North Star Phase 1 (SSI-7474). ERs approved include Mr Steve Fermio, Mr Derek Low and Mr Hadi Johan.	Not triggered	
A25	The Planning Secretary's approval of an ER must be sought no later than one (1) month before the commencement of works.	Condition not triggered, addressed during previous audit. ER approval was obtained 13/10/2020 - more than 1 month before the commencement of works on 10 April 2021. Letter (DPIE, 13/10/2020) to ARTC noting approval of Environment Representative Mr Fermio, Mr Low, and Mr Johan. Alternative ER Peter Hatton approved by Grant Brown as nominee of the Secretary on 22/04/2022.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
A26	The proposed ER must be a suitably qualified and experienced person who was not involved in the preparation of the documents listed in Condition A1, and is independent from the Proponent and companies involved in the design and construction of the CSSI. Skills, qualifications, experience, availability and capacity of the ER must meet the requirements of the Environmental Representative Protocol, Department of Planning and Environment, October 2018. The appointment of the ER must have regard to the Department's guideline Seeking approval from the Department for the appointment of independent experts (DPIE, 2020).	Condition not triggered, addressed during previous audit. Letter (DPIE, 13/10/2020) to ARTC noting approval of Environment Representative Mr Fermio, Mr Low, and Mr Johan. Alternative ER Peter Hatton approved by Grant Brown as nominee of the Secretary on 22/04/2022.	Not triggered	
A27	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 Secretary for the purposes of the CSSI.	Letter (DPIE, 13/10/2020) to ARTC noting approval of Environment Representative Mr Steve Fermio, Mr Low, and Mr Hadi Johan. A request was submitted to DPIE on 5 August 2021 noting the departure of Mr Hadi Johan and proposed inclusion of two additional team member from WolfPeak being Ms Ann Azzopardi and Mr Nick Ballard. Alternative ER Peter Hatton approved by Grant Brown as nominee of the Secretary on 22/04/2022.	Compliant	
A28	For the duration of the works until 12 months after the completion of construction, the approved ER must: <ul style="list-style-type: none"> 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; 	The ER prepares a monthly report in accordance with Condition A28 of the Project Approval. The monthly report is distributed to within ARTC and forwarded to DPIE. Email confirmation of submission of ER Monthly reports was observed for each month from July 2021 to January 2022.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> d. review documents identified in Conditions A11, A17, A31, C1, 0 and C13, and any other documents that are identified by the Secretary, to ensure they are consistent with requirements in or under this approval and if so: <ul style="list-style-type: none"> i. make a written statement to this effect before submission of such documents to the Planning Secretary (if those documents are required to be approved by the Planning Secretary); or ii. make a written statement to this effect before the implementation of such documents (if those documents are required to be submitted to the Planning Secretary / Department for information or are not required to be submitted to the Planning Secretary/Department); e. regularly monitor the implementation of the documents listed in Conditions A11, A17, A31, C1, 0 and C14, to ensure implementation is being carried out in accordance with the document and the terms of this approval; f. as may be requested by the Planning Secretary, help plan, attend or undertake 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 A35 of this approval; g. as may be requested by the Planning Secretary, assist the Department in the resolution of community complaints; h. assess the impacts of minor ancillary facilities comprising lunch sheds, office sheds, material lay down sites, areas used to assemble culverts and turnouts, and portable toilet facilities as required by Condition A21 of this approval; i. consider any minor amendments to be made to the CEMP, CEMP Sub-plans and Construction Monitoring Programs that comprise updating or are of an administrative nature, and are consistent with the terms of this approval and the CEMP, CEMP Sub-plans and Construction Monitoring Programs approved by the Planning Secretary and, if satisfied such amendment is necessary, approve the 			

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>amendment. This does not include any modifications to the terms of this approval; and</p> <p>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) calendar days following the end of each month for the duration of the ER's engagement for the CSSI.</p>			
A29	<p>The Proponent must provide the ER with all documentation requested by the ER in order for the ER to perform their functions specified in Condition A28 (including preparation of the ER Monthly Report), as well as:</p> <ul style="list-style-type: none"> a. the complaints register (to be provided on a weekly basis); 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). 	<p>Interview and email received from WolfPeak on 25 July 2022 confirmed that they have received all documentation requested during the audit period.</p>	Compliant	
A30	<p>The Planning Secretary may at any time commission an audit of an ER's exercise of its functions under Condition A28. The Proponent must:</p> <ul style="list-style-type: none"> a. facilitate and assist the Secretary in any such audit; and b. make it a term of their engagement of an ER that the ER facilitate and assist the Secretary in any such audit. <p><i>Note: The Planning Secretary may dismiss the ER should they consider the ER has not exercised their functions in accordance with this approval.</i></p>	<p>The Planning Secretary has not commissioned an audit of the ER during the audit period.</p>	Not triggered	
COMPLIANCE REPORTING REQUIREMENTS				
A31	<p>Compliance Reports of the project must be carried out in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020).</p>	<p>No compliance reporting required for construction phase works under the Compliance Reporting Post Approval Requirements (2020).</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
A32	Compliance Reports must be submitted to the Department in accordance with the timeframes set out in the Compliance Reporting Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	No compliance reporting required for construction phase works under the Compliance Reporting Post Approval Requirements (2020).	Not triggered	
A33	The Applicant must make each Compliance Report publicly available 60 days after submitting it to the Planning Secretary, unless otherwise agreed by the Planning Secretary.	No compliance reporting required for construction phase works under the Compliance Reporting Post Approval Requirements (2020).	Not triggered	
A34	Notwithstanding the requirements of the Compliance Reporting Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing annual operational compliance reports to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that an operational compliance report has demonstrated operational compliance.	No compliance reporting required for construction phase works under the Compliance Reporting Post Approval Requirements (2020).	Not triggered	
AUDITING				
A35	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	Letter (DPIE, 03/02/2021) to ARTC noting independent auditor approval of Ian Richardson and Belinda Bock (RPS). Subsequent approval of replacement support auditor Sam Mitchell was received 20/07/2021.	Compliant	
A36	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	This audit and the previous audit were conducted in accordance with the Audit PAR 2020.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
A37	The Planning Secretary may require the initial and subsequent Independent Audits to be undertaken at different times to those specified above, upon giving at least 4 weeks' notice (or timing as stipulated by the Planning Secretary) to the applicant of the date upon which the audit must be commenced.	<p>ARTC submitted a request (SSI-7474-PA-173) to the Department on 23 June 2022 notifying of a change of date for two scheduled IEAs as required under CSSI-7474.</p> <p>The request was to change the date of the third IEA (IEA 3) from the 24-25 May 2022 to 2-3 August 2022 due to a number of other audits scheduled for May and June 2022. This reschedule of IEA 3 would also impact the date of fourth IEA (IEA 4). The request was approved by Shelley McPhee ss nominee of the Planning Secretary on 6/07/2022.</p>	Compliant	
A38	<p>In accordance with the specific requirements in the Independent Audit Post Approval Requirements (2020), the Proponent must:</p> <ul style="list-style-type: none"> a. review and respond to each Independent Audit Report prepared under Condition A36 or Condition A37; b. submit the response to the Planning Secretary; and c. make each Independent Audit Report and response to it publicly available 60 days after submission to the Planning Secretary, unless otherwise agreed by the Planning Secretary. 	<p>ARTC responded to each of the non-compliances identified during the previous audit period were responded to in a Response to Findings letter submitted to the Planning Secretary on 9 March 2022. The audit report and response were uploaded to the project website within 60 days.</p> <p>https://inlandrail.artc.com.au/where-we-go/projects/narrabri-to-north-star/planning-approval-documents/</p>	Compliant	
A39	Independent Audit Reports and the Proponent's response to audit findings must be submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (2020), unless otherwise agreed by the Planning Secretary.	The previous Independent Audit Report and ARTC's response was submitted to the Planning Secretary within 2 months of undertaking the independent audit site inspection.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
A40	Notwithstanding the requirements of the Independent Audit Post Approval Requirements (2020), the Planning Secretary may approve a request for ongoing independent operational audits to be ceased, where it has been demonstrated to the Planning Secretary's satisfaction that independent operational audits have demonstrated operational compliance.	Not yet triggered.	Not triggered	
INCIDENT REPORTING AND NOTIFICATION				
A41	<p>During construction, DPIE must be notified in writing immediately after the Proponent becomes aware of an incident. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one), and set out the time, date, location and nature of the incident. A description of whether the incident was a result of any actual or potential non-compliance with this approval should be provided within one week of the notification.</p> <p>The requirement to notify DPIE under this condition excludes incidents which are required to be notified to the Office of the National Rail Safety Regulator. Subsequent notification must be given and reports submitted in accordance with the requirements set out in Appendix B – WRITTEN INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS.</p>	<p>Evidence was provided that DPE has generally been notified in writing immediately after ARTC has become aware of an incident.</p> <p>Multiple environmental incidents were recorded by ARTC during the audit period with twenty-three (23) incidents notified to DPE.</p>	Compliant	
PART B - COMMUNITY INFORMATION AND REPORTING				
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT				
B1	A Communication Strategy must be prepared to facilitate communication between the Proponent, and the community and government authorities (including relevant councils, government agencies, adjoining affected landowners and businesses, and others directly impacted by the CSSI).	<p>Narrabri to North Star Phase 1 Communication Strategy 5-0000-260-PCS-00-ST-0001_D (Revision 2 – 20/01/2021).</p> <p>Letter (DPE, undated, reference SSI7474) to N2NS project approval of the conditions B1-B5 Communication Strategy (Revision 2 – 20/01/2021).</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
B2	<p>The Communication Strategy must:</p> <ul style="list-style-type: none"> a. identify people, organisations and government authorities to be consulted during works; b. set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the CSSI; c. identify opportunities to provide accessible information regarding regularly updated site construction activities, schedules and milestones at each construction ancillary facility and at construction sites located adjacent to town centres; d. consider opportunities for the community to visit construction sites (taking into consideration workplace, health and safety requirements); e. provide for the formation of issue or location-based community forums that focus on key environmental management issues of concern to the relevant community(ies) for the CSSI; f. set out the procedures and mechanisms for consulting with relevant councils and government authorities required by Condition A5, including procedures for repeated requests and nil responses; g. describe the method for broadcasting the 24-hour toll-free telephone complaints number and postal and email addresses for enquiries, as required by Condition B8; h. set out procedures and mechanisms: <ul style="list-style-type: none"> i. through which the community can discuss or provide feedback to the Proponent; ii. through which the Proponent will respond to enquiries or feedback from the community; and <p>to resolve any issues and mediate any disputes that may arise in relation to environmental management and delivery of the CSSI, including timing for mediation to be undertaken once it has been escalated to the dispute resolution process.</p>	<p>Letter (DPIE, undated, reference SSI7474) to N2NS project approval of the conditions B1-B5 Communication Strategy (Revision 2, dated 20 January 2021).</p> <p>Section 6 identifies people, organisations and government authorities to be consulted during works.</p> <p>Section 8.2 sets out how the proponent will communicate with the community.</p> <p>Section 8.2 considers opportunities for the community to visit construction sites</p> <p>Section 8.2 outlines that the proponent will hold quarterly location-based forums at key locations across the project alignment.</p> <p>The proponent consults with relevant stakeholders as per Condition A5.</p> <p>Section 8.2 and Table 6 describes the methods for broadcasting the 24-hour toll-free telephone complaints number and postal and email addresses for enquiries, as required by Condition B8</p> <p>Section 8 and 9 outlines how the proponent provides multiple channels by which the community can provide feedback and/or receive project information, including online and face to face opportunities. ARTC also operates a Complaint Management Process and register.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
B3	The Communication Strategy must be submitted to the Secretary for approval no later than one (1) month before the commencement of any work.	Not triggered, condition met during Audit 1. Community Strategy submitted to DPIE on 2 November 2020. Approval letter issued Matthew Todd as nominee of the Planning Secretary on 23/12/2020.	Not triggered	
B4	Work for the purposes of the CSSI must not commence until the Communication Strategy has been approved by the Secretary.	Not triggered, condition met during Audit 1. Approval letter issued Matthew Todd as nominee of the Planning Secretary on 23/12/2020.	Not triggered	
B5	The Communication Strategy, as approved by the Secretary, must be implemented for the duration of the works and for six (6) months following the completion of construction.	Letter (DPIE, undated, reference SSI7474) to N2NS project approval of the conditions B1-B5 Communication Strategy (Revision 2, dated 20 January 2021). Evidence of implementation observed through interviews with ARTC/Trans4m staff and review of Complaints Register.	Compliant	
COMPLAINTS MANAGEMENT SYSTEM				
B6	A Complaints Management System must be prepared and implemented before the commencement of any works and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI.	Section 9.5 of the CEMP addresses the management of comments, feedbacks, and complaints through Trans4m Rail's complaints management systems. A complaints register is maintained by Trans4M Rail. Interview with the community stakeholder team representative from Trans4m Rail during the site inspection included review of the complaints register and process for managing complaints.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
B7	<p>The following information must be available to facilitate community enquiries and manage complaints one (1) month before the commencement of works and for 12 months following the completion of construction:</p> <ul style="list-style-type: none"> a. a 24- hour telephone number for the registration of complaints and enquiries about the SSI; 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. <p>This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.</p>	<p>A 24hr complaints hotline is available via the project website https://www.trans4mrail.com.au/ - 1800 732 761.</p> <p>CONTACT INFO MAIN OFFICE 64 - 68 Balo Street Moree NSW 2400</p> <p>CALL US 1800 732 761</p> <p>WRITE US COMMUNITY@T4MR.COM.AU</p> <p>A mediation system for complaints unable to be resolved is outlined in Section 9.9.1 of the Narrabri to North Star Phase 1 Communication Strategy (5-0000-260-PCS-00-ST-0001_D).</p>	Compliant	
B8	<p>The telephone number, postal address and email address required under Condition B11 of this approval must be published in a newspaper circulating in the relevant local area and on site hoarding at each construction site before the commencement of construction and published in the same way again before the commencement of operation. This information must also be provided on the website required under Condition B11 of this approval.</p>	<p>Observed evidence of contact details being published in a newspaper circulating in the relevant local area. Evidence of above information on site hoarding at construction sites before the commencement of construction.</p>	Compliant	
B9	<p>A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any works and for a minimum of 12 months following the completion of construction. The Complaints Register must record the:</p> <ul style="list-style-type: none"> a. number of complaints received; 	<p>The complaints register includes the number of complaints received, number of people effected, and the response in relation to each complaint.</p> <p>A total of 53 complaints were received during the audit period.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> b. number of people affected in relation to a complaint; and c. means by which the complaint was addressed and whether resolution was reached, with or without mediation. 			
B10	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	The complaints register has not been requested during the audit period. Not triggered during the audit period.	Not triggered	
PROVISION OF ELECTRONIC INFORMATION				
B11	<p>A website providing information in relation to the CSSI must be established before commencement of works and maintained for the duration of construction, and for a minimum of 12 months following the completion of construction. The following up-to-date information (excluding confidential commercial information) must be published before the relevant works commencing and maintained on the website or dedicated pages:</p> <ul style="list-style-type: none"> a. the current implementation status of the CSSI; b. a copy of the documents listed in Condition A1 of this approval, 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; d. a copy of each statutory approval, licence or permit required and obtained in relation to the CSSI; e. where a condition(s) of this approval requires a document(s) to be prepared before work, construction or operational activity commences, a current copy of the relevant document(s) must be published on the website before the work, construction or operational activity is undertaken; and 	<p>The project has two (websites) that provide the information outlined in Condition B11.</p> <p>ARTC: https://inlandrail.artc.com.au/where-we-go/projects/narrabri-to-north-star/info-hub/</p> <p>The ARTC website provides the planning approval documents for the project. The site provides a link to the NSW Major Planning Portal containing copies of the documents outlined in Condition A1.</p> <p>Trans4m Rail: https://www.trans4mrail.com.au/</p> <p>The Trans4m Rail site provides contacts and documents relevant to the construction phase of the project.</p> <p>Documents required by this condition were noted to be available on the project website as approved by the Department and were noted to have been published within 14 days of the finalisation or approval of the relevant document.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	a copy of each document required to be made publicly available under this approval must be published within 14 days of the finalisation or approval of the relevant document, unless an alternate timeframe is prescribed by another condition of this approval.			
PART C - CONSTRUCTION ENVIRONMENTAL MANAGEMENT				
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN				
C1	A Construction Environmental Management Plan (CEMP) must be prepared in accordance with the Department's Environmental Management Plan Guideline for Infrastructure Projects (DPIE, 2020) to detail how the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1 will be implemented and achieved during all stages of construction.	<p>Construction Environmental Management Plan ARTC Document No.: 5-0018-260-PES-00-PL-0001 Revision: 1 Issued: 2/03/2022 Approved by Matthew Todd-Jones as nominee of the Secretary on 17 March 2022.</p> <p>The CEMP was updated to include the Construction Ancillary Facilities approved in the SEMP, an assessment and approval mechanism for Construction and Minor Ancillary Facilities (under CoA A16 and A21, respectively), comments from ARTC, DPE and the ER and various other administrative changes.</p> <p>The CEMP was observed to be generally prepared in accordance with the Department's Environmental Management Plan Guideline for Infrastructure Projects (DPIE, 2020).</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
C2	<p>The CEMP must provide:</p> <ul style="list-style-type: none"> a. a description of activities to be undertaken during construction (including the scheduling of construction); b. details of environmental policies, guidelines and principles to be followed in the construction of the SSI; c. a program for ongoing analysis of the key environmental risks arising from the activities described in subsection (a) of this condition, including an initial risk assessment undertaken before the commencement of construction of the SSI; d. details of how the activities described in subsection (a) of this condition will be carried out to: <ul style="list-style-type: none"> 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 (d) of this condition; e. an inspection program detailing the activities to be inspected and frequency of inspections; f. a protocol for managing and reporting any: <ul style="list-style-type: none"> i. incidents; and ii. non-compliances with this approval or statutory requirements; g. procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction; h. a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C4. Where staged construction of the SSI is proposed, the CEMP must also identify which CEMP Sub-plan applies to each of the proposed stages of construction; i. a description of the roles and environmental responsibilities for relevant employees and their relationship with the ER; j. for training and induction for employees, including contractors and sub-contractors, in relation to 	<p>The CEMP was approved by DPE on 17 March 2022 and provides the information, programs, and strategies outlined in the Condition.</p> <p>A description of activities to be undertaken during construction is described in Section 4 with a construction schedule located in Section 4.2.</p> <p>Details of environmental policies, guidelines, and principles to be followed in the construction of the SSI are contained in Section 3, 8, and in Appendix B.</p> <p>A program for ongoing analysis of the key environmental risks is contained in Section 7.2, 12, and Appendix D.</p> <p>The Environmental Management Framework to address the performance outcomes of the EIS is described in Section 8 with risk management outlined in 7, 8, and Appendix D.</p> <p>An inspection program detailing the activities to be inspected and frequency of inspections outlined in Section 8.8.</p> <p>An incident and NC reporting protocol is outlined in Section 10 and Appendix F.</p> <p>A procedure for rectifying any non-compliances is outlined in Section 10.3.</p> <p>Section 8 provides a list of all CEMP Sub-plans required in respect of construction, as set out in Condition C4.</p> <p>Key Environmental Management Roles and Responsibilities are outlined in Section 8.4.</p> <p>Competence, Training and Awareness is outlined in Section 8.5.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations																					
	<p>environmental and compliance obligations under the terms of this approval;</p> <p>k. for periodic review and update of the CEMP and all associated plans and programs; and</p> <p>l. relevant details from the Site Establishment Management Plan(s).</p>	<p>A procedure for periodic review and update of the CEMP and all associated plans and programs is described in Section 12. Relevant details from the SEMP are contained in Appendix H.</p>																							
C3	<p>The CEMP must be endorsed by the ER and then submitted to the Secretary for approval no later than one (1) month before the commencement of construction or where construction is staged, no later than one (1) month before the commencement of that stage.</p>	<p>Not triggered, condition met during audit 1. DPIE letter received 7/04/2021 confirming approval of the following documents and required consultation and endorsement by the ER and relevant government agencies. Revision E of the CEMP was submitted to the Planning Secretary for approval on 9/02/2021, greater than one (1) month prior to commencement in April 2021. Revision 1 was endorsed by Wolfpeak on 25 February 2022.</p>	Not triggered																						
C4	<p>The following CEMP Sub-plans must be prepared in consultation with the relevant government agencies and relevant councils identified for each CEMP Sub-plan and be consistent with the CEMP referred to in the EIS.</p> <table border="1" data-bbox="250 981 804 1150"> <thead> <tr> <th></th> <th>Required CEMP Sub-plan</th> <th>Relevant government authorities to be consulted for each CEMP Sub-plan</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Traffic, transport and access</td> <td>TINSW and relevant councils</td> </tr> <tr> <td>(b)</td> <td>Noise and Vibration</td> <td>Relevant councils</td> </tr> <tr> <td>(c)</td> <td>Biodiversity</td> <td>EES, DAWE and relevant councils</td> </tr> <tr> <td>(d)</td> <td>Soil and Water</td> <td>Relevant councils, Water Group, and EES</td> </tr> <tr> <td>(e)</td> <td>Heritage</td> <td>DPC Heritage, RAPs and relevant councils</td> </tr> <tr> <td>(f)</td> <td>Flood Emergency Management</td> <td>SES, EES and relevant councils</td> </tr> </tbody> </table>		Required CEMP Sub-plan	Relevant government authorities to be consulted for each CEMP Sub-plan	(a)	Traffic, transport and access	TINSW and relevant councils	(b)	Noise and Vibration	Relevant councils	(c)	Biodiversity	EES, DAWE and relevant councils	(d)	Soil and Water	Relevant councils, Water Group, and EES	(e)	Heritage	DPC Heritage, RAPs and relevant councils	(f)	Flood Emergency Management	SES, EES and relevant councils	<p>DPIE letter received 7/04/2021 confirming approval of the following documents and required consultation and endorsement by the ER and relevant government agencies:</p> <p>Construction Traffic, Transport and Access Management Sub-Plan 5-0018-260-PES-00-PL-0003 Revision: 2 Issued: 21/04/2022 Approved by Grant Brown as nominee of the Planning Secretary on 18/05/2022.</p> <p>Construction Noise and Vibration Management Sub-Plan 5-0018-260-PES-00-PL-0005 Revision: 1</p>	Compliant	
	Required CEMP Sub-plan	Relevant government authorities to be consulted for each CEMP Sub-plan																							
(a)	Traffic, transport and access	TINSW and relevant councils																							
(b)	Noise and Vibration	Relevant councils																							
(c)	Biodiversity	EES, DAWE and relevant councils																							
(d)	Soil and Water	Relevant councils, Water Group, and EES																							
(e)	Heritage	DPC Heritage, RAPs and relevant councils																							
(f)	Flood Emergency Management	SES, EES and relevant councils																							

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>Issued: 18/08/2021 Approved by Jake Shackleton as nominee of the Planning Secretary on 01/10/2021.</p> <p>Construction Biodiversity Management Sub-Plan 5-0018-260-PES-00-PL-0005 Revision: 3 Issued: 06/01/2022 Approved by Matthew Todd-Jones as nominee of the Planning Secretary on 10/01/2022.</p> <p>Construction Soil and Water Management Sub-Plan 5-0018-260-PES-00-PL-0002 Revision: 1 Issued: 26/10/2021 Approved by Jake Shackleton as nominee of the Planning Secretary on 24/11/2021.</p> <p>Construction Heritage Management Sub-Plan 5-0018-260-PES-00-PL-0008 Revision: 1 Issued: 08/06/2021 Approved by Jake Shackleton as nominee of the Planning Secretary on 17/06/2021.</p> <p>Construction Flood Emergency Management Sub-Plan 5-0018-260-PES-00-PL-0007 Revision: 1 Issued: 20/07/2021</p>		

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		Approved by Matthew Todd-Jones as nominee of the Planning.		
C5	<p>The CEMP Sub-plans listed in Condition 0 must state how:</p> <ol style="list-style-type: none"> the environmental performance outcomes identified in the documents listed in Condition A1, as modified by these conditions, will be achieved; the mitigation measures identified in the documents listed in Condition A1, as modified by these conditions will be implemented; the relevant terms of this approval will be complied with; and <p>issues requiring management during construction (including coordination of concurrent activities of other projects as well as concurrent activities in this CSSI), as identified through ongoing environmental risk analysis, will be managed.</p>	<p>DPIE letter received 7/04/2021 confirming approval of the following documents and required consultation and endorsement by the ER and relevant government agencies.</p> <p>Additional approvals for CEMP sub plans during the audit period outlined below:</p> <ul style="list-style-type: none"> Construction Traffic, Transport and Access Management Sub-Plan, Revision 2 Approved by Grant Brown as nominee of the Planning Secretary on 18/05/2022. <p>The existing and revised CEMP Sub-plans were observed to address the items outlined in the condition.</p>	Compliant	
C6	<p>The CEMP Sub-plans must be developed in consultation with relevant parties identified in Condition 0. Details of all information requested by an agency to be included in a CEMP Sub-plan as a result of consultation, including copies of all correspondence from those agencies, must be provided with the relevant CEMP Sub-plan.</p>	<p>DPIE letter received 7/04/2021 confirming approval of the following documents and required consultation and endorsement by the ER and relevant government agencies.</p> <p>Additional approvals for CEMP sub plans during the audit period outlined below:</p> <ul style="list-style-type: none"> Construction Traffic, Transport and Access Management Sub-Plan, Revision 2 Approved by Grant Brown as nominee of the Planning Secretary on 18/05/2022. <p>Evidence sighted of consultation with relevant parties identified in the condition.</p>	Compliant	
C7	<p>Any of the CEMP Sub-plans may be submitted to the Secretary along with, or subsequent to, the submission of the CEMP, but in any event, no later than one (1) month prior to construction.</p>	<p>CEMP sub plans were submitted to the Planning Secretary for approval on 9/02/2021, greater than one (1) month prior to commencement in April 2021.</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
C8	<p>The Traffic and Transport Management Sub-plan must be consistent with agreements with Councils about the use of local roads and include:</p> <ul style="list-style-type: none"> a. measures to minimise impacts on seasonal traffic, including harvest-related vehicles, and public transport (including school buses and bus stops) and inform freight operators of changes to traffic conditions; and b. measures to maintain pedestrian and vehicular access to affected properties, including mechanisms to consult with affected landowners and implement measures prior to any access disruption. 	<p>Section 6 of the Traffic and Transport Management Sub-plan outlines the measures to minimise impacts on seasonal traffic and measures to maintain pedestrian and vehicular access to affected Properties as per the Condition. Appendix G of the Traffic and Transport Management Sub-plan outlines the stakeholder correspondence and responses including Moree Shire Council, TfNSW, and Narrabri Shire Council.</p>	Compliant	
C9	<p>The Biodiversity Management Sub-plan must include:</p> <ul style="list-style-type: none"> a. a weed management plan, including appropriate weed control to manage introduction and/or spread of weeds from construction areas to any retained Weeping Myall Woodlands TEC, and appropriate protocols to demonstrate compliance with the requirements of the Biosecurity Act 2015 and Biosecurity Regulation 2017; b. procedures for pre-clearing surveys for threatened species to be undertaken by a suitably qualified and experienced ecologist, including survey and relocation methodologies and management/offset measures; c. measures to control cane toads, as relevant to the construction phase areas and scope in accordance with the Threat abatement plan for the biological effects, including lethal toxic ingestion, caused by cane toads (relevant to works adjacent to retained Brigalow (Acacia harpophylla dominant and co-dominant) TEC and Weeping Myall Woodlands TEC); and d. measures to protect EPBC Act listed threatened species, in particular the koala, and threatened ecological communities. 	<p>The construction pest and weed management plan, Revision 1, issued 20/08/2022, is contained in Appendix A. Section 5.8 and Appendix F outlines the procedures for pre-clearing surveys for threatened species to be undertaken by a suitably qualified and experienced ecologist, including survey and relocation methodologies and management/offset measures.</p> <p>Reports for pre-clearing surveys prepared by Geolink Environmental Management and Design were sighted during the audit. Records of fauna capture/relocation are maintained in a register for the project. Measures to control cane toads is outlined in the construction pest and weed management plan and in the Trigger Action Response Plan in Appendix E.</p> <p>Measures to protect EPBC Act listed threatened species, including koala, and threatened ecological communities is outlined throughout the plan.</p>	Compliant	Weed management could be improved around crossings and should be reviewed as the timing of the project enters spring.

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
C10	<p>The Soil and Water Management Sub-plan must include:</p> <ul style="list-style-type: none"> a. a draft water balance for the project; b. information demonstrating that the required construction water resources are legally and physically available; and <p>mitigation measures to address construction water resource shortages that arise.</p>	<p>Section 5 of the Construction Soil and Water Management Sub-Plan (5-0018-260-PES-00-PL-0002) outlines the draft water balance, construction water requirements, and mitigation measures to address construction water resource shortages that arise.</p>	Compliant	
C11	<p>The Heritage Management Sub-plan must include:</p> <ul style="list-style-type: none"> a. identification of the Aboriginal objects that must be avoided and the protective measures to be put in place; b. procedures for salvaging and safe keeping the Aboriginal objects identified in the documents listed in Condition A1, and their long-term management; c. measures to avoid or minimise disturbance to Aboriginal heritage where areas, objects or places of moderate to high significance are found to be present. Where impacts cannot be avoided, details on the methodology for archaeological excavation and/or salvage works (including Survey Areas 15 and 55); d. a process for inspecting trees for evidence of cultural scarring in areas that were not subject to archaeological survey and measures to avoid impact. If impact is unavoidable, works shall be undertaken under the guidance of an appropriately qualified heritage specialist; e. the involvement of a suitably qualified and skilled heritage architect or consultant to provide input to the detailed design of works to and near Moree Railway Station; f. measures to prevent vibration and direct impacts to the Moree Railway Station; g. measures to minimise impacts on and retain the legibility of the concrete post and panel platform at Moree Railway Station; h. an interpretation strategy for Edgeroi, Bellata and Gurley Railway Stations; i. all practical options for offering components of the Croppa Creek rail bridge to the local community; 	<p>The HMP includes the following:</p> <ul style="list-style-type: none"> – identification of the Aboriginal objects that must be avoided and the protective measures to be put in place outlined in Section 5.8. – procedures for salvaging and safe keeping the Aboriginal objects identified in the documents listed in Condition A1, and their long-term management outlined in Section 5.8. – measures to avoid or minimise disturbance to Aboriginal heritage outlined in Section 4.2 and 5.8. – a process for inspecting trees for evidence of cultural scarring in areas that were not subject to archaeological survey and measures to avoid impact outlined in Section 5.8. – the involvement of a suitably qualified and skilled heritage architect or consultant to provide input to the detailed design of works to and near Moree Railway Station is outlined in Sections 2, 5.2 and 5.9.1. – measures to prevent vibration and direct impacts to the Moree Railway Station Section 5.9.1 and NVMP – measures to minimise impacts on and retain the legibility of the concrete post 	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>j. measures to retain the existing North Star station sign in situ (or re-instated following construction) alongside the rail corridor in North Star Community Park; and</p> <p>k. an Unexpected Heritage Finds and Human Remains Procedure, with the requirement that DPC Heritage are contacted and consulted upon the discovery of human remains, prepared by a suitably qualified and experienced heritage specialist.</p> <p>The Proponent must consult with the Registered Aboriginal Parties in the development of the Sub-plan with respect to Aboriginal objects.</p> <p>Note: Human remains that are found unexpectedly during works are under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.</p>	<p>and panel platform at Moree Railway Station outlined in Sections 5.2 and 5.9.1.</p> <ul style="list-style-type: none"> – an interpretation strategy for Edgeroi, Bellata and Gurley Railway Stations outlined in Section 5.9.1. – all practical options for offering components of the Croppa Creek rail bridge to the local community outlined in Section 2. – measures to retain the existing North Star station sign in alongside the rail corridor in North Star Community Park outlined in Sections 5.9.1. – Sections 5.8.6 and 5.8.7 outline an Unexpected Heritage Finds and Human Remains Procedure. 		
C12	The Flood Emergency Management Sub-plan must include measures for managing flood risks during construction and address flood recovery.	The FEMP was prepared in consultation with DPIE and approved, CEMP rev E 04/02/2021. Endorsement of these plans was provided a letter from NSW DPIE dated 7 April 2021.	Compliant	
C13	Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Secretary. The CEMP and CEMP Sub-plans, as approved by the Secretary, including any minor amendments approved by the ER, must be implemented for the duration of construction. Where the CSSI is being staged, construction of that stage is not to commence until the relevant CEMP and sub-plans have been endorsed by the ER and approved by the Secretary.	The condition was triggered outside of the audit period and was found compliant. The CEMP, Sub-plans, and monitoring programs were prepared in consultation with DPIE and approved, CEMP rev E 04/02/2021. Endorsement of these plans was provided a letter from NSW DPIE dated 7 April 2021.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations															
CONSTRUCTION MONITORING PROGRAMS																			
C14	<p>The following Construction Monitoring Programs must be prepared in consultation with the relevant government agencies and relevant councils identified for the Construction Monitoring Programs to compare actual performance of construction of the CSSI against performance predicted in the documents specified in Condition A1.</p> <table border="1" data-bbox="255 555 804 683"> <thead> <tr> <th data-bbox="255 555 293 587"></th> <th data-bbox="300 555 483 587">Required Construction Monitoring Programs</th> <th data-bbox="490 555 804 587">Relevant government authorities to be consulted for each Construction Monitoring Program</th> </tr> </thead> <tbody> <tr> <td data-bbox="255 592 293 608">(a)</td> <td data-bbox="300 592 483 608">Noise and vibration</td> <td data-bbox="490 592 804 608">Nil</td> </tr> <tr> <td data-bbox="255 612 293 628">(b)</td> <td data-bbox="300 612 483 628">Water usage</td> <td data-bbox="490 612 804 628">Water Group</td> </tr> <tr> <td data-bbox="255 633 293 649">(c)</td> <td data-bbox="300 633 483 649">Air Quality</td> <td data-bbox="490 633 804 649">Nil</td> </tr> <tr> <td data-bbox="255 654 293 683">(d)</td> <td data-bbox="300 654 483 683">Physical condition of local roads</td> <td data-bbox="490 654 804 683">Relevant councils</td> </tr> </tbody> </table>		Required Construction Monitoring Programs	Relevant government authorities to be consulted for each Construction Monitoring Program	(a)	Noise and vibration	Nil	(b)	Water usage	Water Group	(c)	Air Quality	Nil	(d)	Physical condition of local roads	Relevant councils	<p>The CEMP, Sub-plans, and monitoring programs have been prepared and approved in consultation with DPE and the relevant government agencies and relevant councils. DPE approval letters were sighted for each relevant plan with dates and details noted in the conditions above.</p>	Compliant	
	Required Construction Monitoring Programs	Relevant government authorities to be consulted for each Construction Monitoring Program																	
(a)	Noise and vibration	Nil																	
(b)	Water usage	Water Group																	
(c)	Air Quality	Nil																	
(d)	Physical condition of local roads	Relevant councils																	
C15	<p>Each Construction Monitoring Program must provide:</p> <ol style="list-style-type: none"> a. details of baseline data available; b. details of any baseline data to be obtained and when; c. details of all monitoring of the CSSI to be undertaken; d. the parameters of the CSSI to be monitored; e. the frequency of monitoring to be undertaken; f. the location of monitoring; g. the reporting of monitoring and analysis results against relevant criteria; h. procedures to identify and implement additional mitigation measures where results of monitoring are unsatisfactory; and i. any consultation required in relation to the monitoring programs. 	<p>The CEMP, Sub-plans, and monitoring programs have been prepared and approved in consultation with DPIE and the relevant government agencies and relevant councils.</p> <p>The Construction Monitoring Program were observed to provide the information outlined in condition C15.</p>	Compliant																

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
C16	The Construction Monitoring Programs must be developed in consultation with relevant government agencies as identified in Condition C14 of this approval and must include information requested by an agency to be included in a Construction Monitoring Programs during such consultation. Details of all information requested by an agency including copies of all correspondence from those agencies, must be provided with the relevant Construction Monitoring Program.	The CEMP, Sub-plans, and monitoring programs have been prepared and approved in consultation with DPIE and the relevant government agencies and relevant councils.	Compliant	
C17	The Construction Monitoring Programs must be endorsed by the ER and then submitted to the Planning Secretary for approval at least one month before the commencement of construction.	Not triggered, condition met during audit 1. The CEMP, Sub-plans, and monitoring programs have been prepared and approved in consultation with DPIE and the relevant government agencies and relevant councils.	Not triggered	
C18	Construction must not commence until the Planning Secretary has approved all of the required Construction Monitoring Programs, and all relevant baseline data for the specific construction activity has been collected.	Not triggered, condition met during audit 1. Baseline data is included in the Construction Noise and Vibration Management Plan, Construction Soil and Water Management Plan and the Construction Traffic and Transport Management Plan. The construction monitoring program for noise and vibration is outlined in Section of 11.3 of the NVMP. The construction monitoring program for soil and water is outlined in Section 7.2 of the SWMP. Section 5.2 of the TTAMP outlines the Traffic Monitoring Program During Construction. These documents were submitted to the Department and approved prior to commencement of construction. This is evidenced in the NSW DPIE letter -	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<i>Approval of Plan Strategy or Study_07042021_050530.</i>		
C19	The Construction Monitoring Programs, as approved by the Planning Secretary 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, whichever is the greater.	Construction Monitoring Programs are outlined in the relevant Sub-plans. The Construction Monitoring Programs were observed to be implemented during the audit period as outlined in the SSI 7474 – 6 Monthly Construction Monitoring Report (October 2021 – April 2022) dated 26/05/2022.	Compliant	
C20	The results of the Construction Monitoring Programs must be submitted to the Planning Secretary, 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.	SSI 7474 – 6 Monthly Construction Monitoring Report (October 2021 – April 2022) dated 26/05/2022. Sighted evidence that the 6 Monthly Construction Monitoring Report was submitted to DPE and relevant regulatory agencies.	Compliant	
PART D - OPERATIONAL ENVIRONMENTAL MANAGEMENT				
OPERATIONAL ENVIRONMENTAL MANAGEMENT				
D1	An Operational Management Plan (OEMP) must be prepared in accordance with the Department’s Environmental Management Plan Guideline for Infrastructure Projects (DPIE, 2020) to detail how the performance outcomes, commitments and mitigation measures made and identified in the documents listed in Condition A1 will be implemented and achieved during operation. This condition (Condition D1) does not apply if Condition D2 of this approval applies.	Not triggered. Part of the N2NS project was in an interim operational phase during the audit period as agreed with ARTC customers to facilitate harvest season from November 2021 to 1st March 2022. This interim operational phase is not required to use the IEMF as pre-existing rail traffic is being used not triggering the Inland Rail “Operational” context of the CSSI. This is denoted in the “Operational Staging Report” under condition A11 of approval CSSI 7474 and the report was accepted by DPIE.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
D2	<p>An OEMP is not required for the CSSI if the Proponent has an Environmental Management System (EMS) or equivalent as agreed with the Secretary, and can demonstrate, to the written satisfaction of the Secretary, that through the EMS:</p> <ul style="list-style-type: none"> a. the performance outcomes, commitments and mitigation measures, made and identified in the documents listed in Condition A1, and terms of this of approval can be achieved; b. issues identified through ongoing risk analysis can be managed; and <p>procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.</p>	<p>Not triggered.</p> <p>Part of the N2NS project was in an interim operational phase as agreed with ARTC customers to facilitate harvest season from November 2021 to 1st March 2022 during the audit period. This interim operational phase is not required to use the IEMF as pre-existing rail traffic is being used not triggering the Inland Rail “Operational” context of the CSSI. This is denoted in the “Operational Staging Report” under condition A11 of approval CSSI 7474 and the report was accepted by DPIE (evidence supplied).</p>	Not triggered	
D3	<p>The performance measures and mitigation measures detailed in the OEMP must address the maintenance of culverts with respect to blockages, siltation and scouring.</p>	Not triggered during the audit period.	Not triggered	
D4	<p>The OEMP or EMS (or equivalent) as agreed with the Secretary must be submitted to the Secretary for information at least one (1) month prior to the commencement of operation of the CSSI.</p>	Not triggered during the audit period.	Not triggered	
PART E - KEY ISSUE CONDITIONS				
NOISE AND VIBRATION				
E1	<p>Work Hours</p> <p>Works must be undertaken during the following hours:</p> <ul style="list-style-type: none"> (a) 7:00 am to 6:00 pm Mondays to Fridays; (b) 7:00 am to 6:00 pm Saturdays; and (c) at no time on Sundays or public holidays. 	<p>Works were observed to be undertaken within the hours stipulated in this condition during the site inspection.</p> <p>It is noted that an Environmental Planning and Assessment (COVID-19 Development – Infrastructure Construction Work Days) Order 2020, was in place during the audit period. The order permitted standard</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>construction hours on this project to be extended as follows:</p> <ul style="list-style-type: none"> – Saturdays from 1pm to 6pm (no 'high noise work' permitted) [where these hours are not part of standard hours] – Sundays from 8am to 6pm (no 'high noise work' permitted) – Public holidays from 8am to 6pm (no 'high noise work' permitted). <p>The order expired on 31 March 2022, with construction hours returning to the work hours specified in E1.</p> <p>It is noted that a number of OOHW applications have been implemented to allow Sunday and PH works in Edgeroi, Bellata and North Star under E3(c) and T4MR's EPL condition L6.3 during the audit period.</p>		
E2	<p>Notwithstanding Condition E1, works affecting any given receiver may be undertaken during the hours of 6.00 am to 6.00 pm each day over a three (3) month period provided that there is no work between the hours of 6:00 pm on a Saturday and 7:00 am on a Monday every second week.</p>	<p>Works were observed to be undertaken within the hours stipulated in this condition during the site inspection.</p>	Compliant	
E3	<p>Variation to Work Hours Notwithstanding Conditions E1 and E2, works associated with the CSSI may be undertaken outside the hours specified under those conditions in the following circumstances:</p> <ol style="list-style-type: none"> a. for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or b. where it is required in an emergency to avoid injury or the loss of life, to avoid damage or loss of property or to prevent environmental harm; or 	<p>The Environmental Planning and Assessment (COVID-19 Development – Infrastructure Construction Work Days) Order 2020, was in place during the audit period. The order permitted standard construction hours on this project to be extended as follows:</p> <ul style="list-style-type: none"> – Saturdays from 1pm to 6pm (no 'high noise work' permitted) [where these hours are not part of standard hours] 	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>c. where different construction hours are permitted under an EPL in force in respect of the CSSI; or</p> <p>d. work approved under an Out-of-Hours Work Protocol for work not subject to an EPL as required by Condition E8; or</p> <p>e. where a negotiated agreement is in force, in accordance with Condition E4 and E5; or</p> <p>f. construction that causes LAeq(15 minute) noise levels:</p> <ol style="list-style-type: none"> i. no more than 5 dB(A) above the rating background level at the façade of any residence in accordance with the Interim Construction Noise Guideline (DECC, 2009) or if between the hours of 10:00 pm and 7:00 am no more than 52 dB(A)LA(max) or more than 15 dB(A)LA(Max) above the rating background level whichever is the higher, and ii. no more than the noise management levels specified in Table 3 of the Interim Construction Noise Guideline (DECC, 2009) at other sensitive land uses, and iii. continuous or impulsive vibration values, measured at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.2 of Assessing Vibration: a technical guideline (DEC, 2006), and <p>intermittent vibration values measured at the most affected residence are no more than those for human exposure to vibration, specified in Table 2.4 of Assessing Vibration: a technical guideline (DEC, 2006).</p>	<ul style="list-style-type: none"> – Sundays from 8am to 6pm (no 'high noise work' permitted) – Public holidays from 8am to 6pm (no 'high noise work' permitted). <p>The order expired on 31 March 2022 with a number of OOHW applications have been implemented to allow Sunday and PH works in Edgeroi, Bellata and North Star under E3(c) and T4MR's EPL condition L6.3 during the audit period.</p>		
E4	The Proponent may reach negotiated agreements with sensitive receivers (owners and occupiers) to carry out works in accordance with the hours and noise limits specified in the negotiated agreements.	There have been multiple agreements negotiated with sensitive receivers during the audit period with a number of agreements still awaiting formal written approval.	Compliant	
E5	All negotiated agreements must be in writing and finalised before the commencement of works.	Negotiated agreements were observed in writing and finalised before the commencement of works.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E6	<p>On becoming aware of the need for emergency works in accordance with Condition E3(b), the Proponent must notify the Department in writing to compliance@planning.nsw.gov.au, the ER and the EPA of the need for that work. The Proponent must use best endeavours to notify all affected sensitive receivers of the likely impact and duration of those works.</p>	<p>Prior to a Five-clawed Worm-skink (FCWS) discovery in Stage 2, Trans4m Rail had commenced fencing works for a landowner at Tycannah. Approximately 1600 metres of fencing was removed between chainages 649km and 651km.</p> <p>Following the FCWS discovery the fencing work was suspended pending resolution however the landowner had proceeded with the purchase of significant numbers of livestock to be housed in the paddock where there was no fence. As an emergency safety measure to prevent stock entering the live rail corridor, the fence was required to be reinstated on the property.</p> <p>Approval was granted by Matthew Todd-Jones on 4 March 2022 for the emergency works to occur.</p>	Compliant	
E7	<p>Highly Noise Intensive Work</p> <p>Except as permitted by an EPL or approved through an Out of Hours Works Protocol (for works not subject to an EPL), highly noise intensive work that results in an exceedance of the applicable NML at the same receiver must only be undertaken:</p> <ul style="list-style-type: none"> 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. in continuous blocks not exceeding three hours each with a minimum respite from those activities and works of not less than one hour between each block. <p>For the purpose of this condition, 'continuous' includes any period during which there is less than a one-hour respite between ceasing and recommencing any works that are the subject of this condition.</p>	<p>High risk activities assessed by Appendix F (CNVMP) Noise estimator. Noise HNIW have been undertaken outside approved construction hours, based on OOHW application during the audit period.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E8	<p>Out-of-Hours Work Protocol – Work not subject to an EPL</p> <p>An Out-of-Hours Work Protocol must be prepared to identify a process for the consideration, management and approval of work which is outside the hours defined in Conditions E1 and E2, and that is not subject to an EPL. The Protocol must be approved by the Planning Secretary before commencement of the relevant out-of-hours work. The Protocol must be prepared in consultation with the EPA. The Protocol must:</p> <ul style="list-style-type: none"> a. provide a process for the consideration of out-of-hours work against the relevant noise and vibration criteria, including the determination of low and high-risk activities; b. provide a process for the identification and implementation of mitigation measures for residual impacts, including respite periods in consultation with the community at each affected location; c. identify procedures to facilitate the coordination of out-of-hours work approved by an EPL to ensure appropriate respite is provided; d. identify an approval process that considers the risk of activities, proposed mitigation, management, and coordination, including where: <ul style="list-style-type: none"> i. low risk activities can be approved by the ER, and ii. high risk activities that are approved by the Planning Secretary; and <p>identify Department, EPA and community notification arrangements for approved out-of-hours works, which maybe detailed in the Communication Strategy.</p>	<p>An Out of Hours Work Protocol and Application Form is located in Appendix D of the Construction Noise and Vibration Management Sub-Plan (2600-0018 N2NS-SP1).</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E9	<p>Noise generating work in the vicinity of potentially-affected community, religious, educational institutions and noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) resulting in noise levels above the NMLs must not be timetabled within sensitive periods or during important events, unless other reasonable arrangements with the affected institutions are made at no cost to the affected institution or as otherwise approved by the Planning Secretary.</p>	<p>Consultation is carried out with noise sensitive receivers where there is potential for noise intensive works to be above the relevant noise management level, to determine periods of use of these facilities that would be particularly sensitive to noise or vibration impacts in order to program works to away from sensitive time periods and ensure impacts are minimised during these sensitive periods.</p> <p>The process is captured as part of the N2NS Construction Noise and Vibration Impact Statement outlined in the Construction Noise and Vibration Management Sub-Plan (2600-0018 N2NS-SP1).</p> <p>There have not been any requirements to adjust works schedules in response to noise generating work in the vicinity of potentially affected sensitive receiver as outlined in E9.</p>	Compliant	
E10	<p>Noise and Vibration Mitigation</p> <p>Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria:</p> <ul style="list-style-type: none"> a. construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009); b. 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"; 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). 	<p>Mitigation measures are outlined Section 7 and Section 10 of the N2NS Construction Noise and Vibration Impact Statement outlined in the Construction Noise and Vibration Management Sub-Plan (2600-0018 N2NS-SP1).</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>Any works identified as exceeding the noise management levels and/or vibration criteria must be managed in accordance with the Construction Noise and Vibration Management Sub-plan required by Condition 0.</p> <p><i>Note: The Interim Construction Noise Guideline identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction Noise Management Level.</i></p>			
E11	<p>Owners and occupiers of properties at risk of exceeding the screening criteria for cosmetic damage must be notified before construction that generates 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, owner and occupiers must be provided with a schedule of potential exceedances for the duration of the potential exceedances, unless otherwise agreed by the owner and occupier. These properties must be identified and considered in the Construction Noise and Vibration Management Sub-plan required by Condition 0.</p>	<p>The Construction Noise and Vibration Management Sub-plan addresses potential vibration impacts. This condition has not been triggered at the time of the audit.</p>	Not triggered	
E12	<p>This approval does not permit blasting.</p>	<p>No blasting has occurred during the audit period. Blasting is not proposed for the project.</p>	Compliant	
E13	<p>Noise Mitigation – Operational Noise Mitigation Measures</p> <p>The Proponent must prepare an Operational Noise and Vibration Review (ONVR) to confirm noise and vibration control measures that would be implemented for the operation of the CSSI. The ONVR and identification / selection of any noise mitigation measures must be prepared in consultation with the EPA and impacted sensitive receivers. Where barrier options (e.g. noise walls or mounds) are proposed to be implemented, consultation must also be undertaken with the relevant councils. The ONVR must:</p> <ol style="list-style-type: none"> a. confirm the appropriate operational noise and vibration objectives and levels for adjoining development, including existing sensitive receivers; 	<p>Operational Noise and Vibration Review (ONVR) Phase 1 3-0001-260-EEC-00-RP-000 Revision: H Issued: 18 March 2022 Approved by Dominic Crinnion as nominee of the Planning Secretary on 09/05/2022. Section 4 confirms the appropriate operational noise and vibration objectives and levels for adjoining development, including existing sensitive receivers.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> b. confirm the operational noise and vibration predictions based on the final design. Confirmation must be based on an appropriately calibrated noise model (which has incorporated additional noise monitoring, and concurrent traffic counting, where necessary for calibration purposes). c. Identify / confirm sensitive receivers at which the criteria set out in the Rail Infrastructure Noise Guideline (EPA, 2013) are predicted to be exceeded once the CSSI is operational and in 2040; d. review the suitability of the operational noise mitigation measures identified in the documents listed in Condition A1 and, where necessary, investigate and identify additional noise and vibration mitigation measures required to achieve the noise criteria outlined in the Rail Infrastructure Noise Guideline once the CSSI is operational and in 2040. This review must consider local climate and impacts on existing cooling devices, and alternative at-property mitigation measures where the physical condition of a receiver building would render acoustic glazing and seals ineffective; e. describe the final suite of noise and vibration mitigation measures that will be implemented to achieve the noise criteria outlined in the Rail Infrastructure Noise Guideline once the CSSI is operational and in 2040, including the timing of implementation in accordance with Condition E14; f. include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures; and g. procedures for the management of operational noise and vibration complaints. <p>The ONVR is to be verified by a suitably qualified and experienced noise and vibration expert. The ONVR is to be undertaken at the Proponent's expense and submitted to the Secretary for approval within three (3) months of construction commencing.</p>	<p>Section 6 and 7 confirms the operational noise and vibration predictions based on the final design.</p> <p>Sensitive receivers at which the criteria set out in the Rail Infrastructure Noise Guideline are predicted to be exceeded once the CSSI is operational and in 2040 are identified/confirmed in Section 6.</p> <p>A review of the suitability of the operational noise mitigation measures identified in the documents listed in Condition A1 is contained in Section 6.3 and 6.4.1.</p> <p>The final suite of noise and vibration mitigation measures that will be implemented to achieve the noise criteria outlined in the Rail Infrastructure Noise Guideline once the CSSI is operational and in 2040, including the timing of implementation in accordance with Condition E14 is described in Section 6.4.</p> <p>A consultation strategy is outlined in Section 8.</p> <p>Operational noise and vibration complaints will be managed as per the ARTC complaints process map provided in Section 9.</p> <p>The ONVR was verified by a suitably qualified and experienced noise and vibration experts from WSP Australia Mott MacDonald Design Joint Venture (IRDJV). The ONVR was undertaken at ARTC's expense. A number of extensions to the submission of the ONVR with 3 months of commencement of construction were granted with the ONVR submitted before the agreed date of 31 August 2022.</p>		

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E14	<p>Operational noise mitigation measures identified in Condition E13 (such as at-property architectural treatments) that will not be affected by construction works, must be implemented:</p> <ul style="list-style-type: none"> a. within six (6) months of the commencement of construction affecting the impacted receiver/s; b. in the case of at-property treatments, as agreed with the landowner; or <p>as agreed by the Planning Secretary.</p>	<p>The N2NS Noise and Vibration Impacts MCoA Report prepared by Projence Pty Ltd was completed 30/03/2022.</p> <p>The ONVR Report and Noise and Vibration Impacts Report provides that the mitigation measures for receivers where the predicted, unmitigated noise levels exceed the relevant trigger levels will be addressed with at-property treatments. The current consultation and ongoing agreement strategy with the landowners is detailed in the Noise and Vibration Impacts Report as required by MCoA E14 (b).</p> <p>Additionally, Section 8 of the ONVR Report and the Noise and Vibration Impacts Report details the ongoing consultation strategy for agreement from directly affected landowners on the specific noise and vibration mitigation measures required at each individual property identified as being impacted in the ONVR Report.</p>	Not triggered	
E15	<p>Where implementation of operational noise mitigation measures are not proposed in accordance with Conditions E13 and E14, 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 identified in Condition E13 are implemented. The report must be endorsed by the ER and submitted to the Planning Secretary prior to the commencement of construction which would affect the identified sensitive receivers.</p>	<p>Stakeholder consultation in relation to at property treatments is ongoing and will be assessed during the next IEA during the construction period.</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E16	<p>In 2026 and 2035, or as otherwise agreed with the Planning Secretary, 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 E13. The Proponent must prepare an Operational Noise Compliance Report (ONCR) to document this monitoring. The Report must include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a. noise monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under Condition E13; b. methodology, location and frequency of noise monitoring undertaken, including monitoring sites at which CSSI noise levels are ascertained, with specific reference to locations indicative of impacts on sensitive receivers; c. details of any complaints and enquiries received in relation to operational noise generated by the CSSI between the date of commencement of operation and the date the report was prepared; d. any required recalibrations of the noise model taking into consideration factors such as noise monitoring and actual train movements; e. an assessment of the performance and effectiveness of applied noise mitigation measures together with a review and if necessary, reassessment of mitigation measures; and f. identification of additional measures to those identified in the review of noise mitigation measures required by Condition E13, that would be implemented with the objective of meeting the criteria outlined in the Rail Infrastructure Noise Guideline, when these measures would be implemented and how their effectiveness would be measured and reported to the Secretary and the EPA. <p>The ONCR is to be verified by a suitably qualified and experienced noise and vibration expert. The ONCR must be</p>	Project not in operational phase, not triggered during the audit period.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations									
	submitted to the Secretary and the EPA for information within 90 days of completing the operational noise monitoring. <i>Note: 2026 and 2035 are specified as representing 12 months and 10 years after the anticipated commencement of operation of the entire Inland Rail project. Should this timeframe change, the Proponent should seek the approval of the Planning Secretary to vary the timeframe in which to satisfy this condition.</i>												
BIODIVERSITY													
E17	The Proponent must minimise impacts to plant community types and not exceed the total areas impacted as identified in Table E1. <table border="1" data-bbox="255 624 804 836"> <caption>Table E1: Native Vegetation Impacted</caption> <thead> <tr> <th>Vegetation Zone and Plant Community Type (PCT) ID and Name</th> <th>TEC under the EPBC Act (ha)</th> <th>Total Area impacted (ha)</th> </tr> </thead> <tbody> <tr> <td>Zone 1 - PCT27 (BR233, NA219) Weeping Myall open woodland of the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion</td> <td>Weeping Myall Woodlands – 9.16</td> <td>17.94</td> </tr> <tr> <td>Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gilgaied clay from Pilliga Scrub to Goondwindi, Brigalow Belt South Bioregion</td> <td>Brigalow (Acacia harpophylla dominant and codominant) – 16.13</td> <td>17.31</td> </tr> </tbody> </table>	Vegetation Zone and Plant Community Type (PCT) ID and Name	TEC under the EPBC Act (ha)	Total Area impacted (ha)	Zone 1 - PCT27 (BR233, NA219) Weeping Myall open woodland of the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion	Weeping Myall Woodlands – 9.16	17.94	Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gilgaied clay from Pilliga Scrub to Goondwindi, Brigalow Belt South Bioregion	Brigalow (Acacia harpophylla dominant and codominant) – 16.13	17.31	Table 1.4 and Table 1.5 of the June 2022 addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report, Rev 8, 27 June 2022 provides a summary of the impacts on vegetation communities and species credits species between the approved SPIR CIZ and the current IFC CIZ. The tables demonstrate that the impacts to plant community types have been minimised and do not exceed the total areas impacted as identified in Table E1: <ul style="list-style-type: none"> • Overall 44 percent reduction in the ecosystem credits • Overall 62 percent reduction in species credits 	Compliant	
Vegetation Zone and Plant Community Type (PCT) ID and Name	TEC under the EPBC Act (ha)	Total Area impacted (ha)											
Zone 1 - PCT27 (BR233, NA219) Weeping Myall open woodland of the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion	Weeping Myall Woodlands – 9.16	17.94											
Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gilgaied clay from Pilliga Scrub to Goondwindi, Brigalow Belt South Bioregion	Brigalow (Acacia harpophylla dominant and codominant) – 16.13	17.31											

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations																											
	<table border="1"> <tr> <td data-bbox="248 325 479 405">Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coolabah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion</td> <td data-bbox="486 325 636 405"><i>Coolabah - Black Box Woodland of the Darling Riverine Plains and the Brigalow Belt South Bioregions – 1.74</i></td> <td data-bbox="642 325 801 405">1.74</td> </tr> <tr> <td data-bbox="248 410 479 505">Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion</td> <td data-bbox="486 410 636 505"><i>Natural Grasslands on Basalt and Fine-textured Alluvial Plains of Northern NSW and Southern Qld – 432.07</i></td> <td data-bbox="642 410 801 505">432.07</td> </tr> <tr> <td data-bbox="248 510 479 558">Zone 5 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW</td> <td data-bbox="486 510 636 558">Not listed</td> <td data-bbox="642 510 801 558">143.95</td> </tr> <tr> <td data-bbox="248 563 479 627">Zone 6 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)</td> <td data-bbox="486 563 636 627">Not listed</td> <td data-bbox="642 563 801 627">249.85</td> </tr> <tr> <td data-bbox="248 632 479 743">Zone 7 - PCT71 (BR127, NA126) Carbeen – White Cypress Pine - River Red Gum - bloodwood tall woodland on sandy loam alluvial and aeolian soils in the northern Brigalow Belt South Bioregion and Darling Riverine Plains Bioregion</td> <td data-bbox="486 632 636 743">Not listed</td> <td data-bbox="642 632 801 743">0.51</td> </tr> <tr> <td data-bbox="248 748 479 828">Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion</td> <td data-bbox="486 748 636 828">Not listed</td> <td data-bbox="642 748 801 828">11.82</td> </tr> <tr> <td data-bbox="248 833 479 896">Zone 9 - PCT 135 Coobah - Western Rosewood low open tall shrubland or woodland mainly on outwash areas in the Brigalow Belt South Bioregion</td> <td data-bbox="486 833 636 896">Not listed</td> <td data-bbox="642 833 801 896">9.50</td> </tr> <tr> <td data-bbox="248 901 479 981">Zone 10 - PCT 413 Silver-leaved Ironbark - White Cypress Pine - box dry shrub grass woodland of the Pilliga Scrub - Warialda region, Brigalow Belt South Bioregion</td> <td data-bbox="486 901 636 981">Not listed</td> <td data-bbox="642 901 801 981">5.72</td> </tr> <tr> <td data-bbox="248 986 479 1011">Total Area Impacted</td> <td data-bbox="486 986 636 1011">459.10</td> <td data-bbox="642 986 801 1011">890.41</td> </tr> </table>	Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coolabah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion	<i>Coolabah - Black Box Woodland of the Darling Riverine Plains and the Brigalow Belt South Bioregions – 1.74</i>	1.74	Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion	<i>Natural Grasslands on Basalt and Fine-textured Alluvial Plains of Northern NSW and Southern Qld – 432.07</i>	432.07	Zone 5 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	Not listed	143.95	Zone 6 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)	Not listed	249.85	Zone 7 - PCT71 (BR127, NA126) Carbeen – White Cypress Pine - River Red Gum - bloodwood tall woodland on sandy loam alluvial and aeolian soils in the northern Brigalow Belt South Bioregion and Darling Riverine Plains Bioregion	Not listed	0.51	Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion	Not listed	11.82	Zone 9 - PCT 135 Coobah - Western Rosewood low open tall shrubland or woodland mainly on outwash areas in the Brigalow Belt South Bioregion	Not listed	9.50	Zone 10 - PCT 413 Silver-leaved Ironbark - White Cypress Pine - box dry shrub grass woodland of the Pilliga Scrub - Warialda region, Brigalow Belt South Bioregion	Not listed	5.72	Total Area Impacted	459.10	890.41			
Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coolabah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion	<i>Coolabah - Black Box Woodland of the Darling Riverine Plains and the Brigalow Belt South Bioregions – 1.74</i>	1.74																													
Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion	<i>Natural Grasslands on Basalt and Fine-textured Alluvial Plains of Northern NSW and Southern Qld – 432.07</i>	432.07																													
Zone 5 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	Not listed	143.95																													
Zone 6 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)	Not listed	249.85																													
Zone 7 - PCT71 (BR127, NA126) Carbeen – White Cypress Pine - River Red Gum - bloodwood tall woodland on sandy loam alluvial and aeolian soils in the northern Brigalow Belt South Bioregion and Darling Riverine Plains Bioregion	Not listed	0.51																													
Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion	Not listed	11.82																													
Zone 9 - PCT 135 Coobah - Western Rosewood low open tall shrubland or woodland mainly on outwash areas in the Brigalow Belt South Bioregion	Not listed	9.50																													
Zone 10 - PCT 413 Silver-leaved Ironbark - White Cypress Pine - box dry shrub grass woodland of the Pilliga Scrub - Warialda region, Brigalow Belt South Bioregion	Not listed	5.72																													
Total Area Impacted	459.10	890.41																													
E18	<p>The Proponent must meet the biodiversity offset obligations for ecosystem and species credits as set out in Tables E2 and E3, within two (2) years of the CSSI approval. The retirement of the biodiversity credits must be carried out in accordance with the NSW Biodiversity Offsets Policy for Major Projects and can be achieved by a combination of:</p> <ol style="list-style-type: none"> acquiring and retiring “biodiversity credits” within the meaning of the Biodiversity Conservation Act 2016; and/or making a payment into the Biodiversity Conservation Fund; and/or outlining in a Biodiversity Offset Strategy the provision of supplementary measures. The Strategy must be prepared in consultation with EES and DAWE. 	Not triggered during the audit period the biodiversity offset obligations for ecosystem and species credits as set out in Tables E2 and E3 are required to be completed by 13 August 2022.	Not triggered																												

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations																																							
	<p>Notes: 1. Following repeal of the Threatened Species Conservation Act 1995 on 25 August 2017, "biodiversity credits" created under that Act are taken to be "biodiversity credits" under the Biodiversity Conservation Act 2016 by virtue of clause 19 of the Biodiversity Conservation (Savings and Transitional) Regulation 2017.</p> <p>Table E2: Ecosystem Credits to be Retired</p> <table border="1" data-bbox="255 459 810 1203"> <thead> <tr> <th colspan="3">Ecosystem Credits</th> </tr> <tr> <th>Vegetation Zone and Plant Community Type (PCT) ID and Name</th> <th>EPBC Act equivalent TEC or habitat of EPBC Act listed threatened species</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td>Zone 1 - PCT27 (BR233, NA219) Weeping Myall open woodland of the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion</td> <td>Weeping Myall Woodlands</td> <td>900</td> </tr> <tr> <td>Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gigaiead clay from Pilliga Scrub to Goondiwindi, Brigalow Belt South Bioregion</td> <td>Brigalow (<i>Acacia harpophylla</i> dominant and codominant)</td> <td>1223</td> </tr> <tr> <td>Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coobah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion</td> <td>Coolabah - Black Box Woodland of the Darling Riverine Plains and the Brigalow Belt South Bioregions</td> <td>93</td> </tr> <tr> <td>Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion</td> <td>Natural Grasslands on Basalt and Fine-textured Alluvial Plains of Northern NSW and Southern Qld</td> <td>20102</td> </tr> <tr> <td>Zone 5 - PCT58 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW</td> <td>Not Listed</td> <td>8851</td> </tr> <tr> <td>Zone 6 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)</td> <td>Not listed</td> <td>8294</td> </tr> <tr> <td>Zone 7 - PCT71 (BR127, NA126) Carbeen – White Cypress Pine - River Red Gum - bloodwood tall woodland on sandy loam alluvial and aeolian soils in the northern Brigalow Belt South Bioregion and Darling Riverine Plains Bioregion</td> <td>Not listed</td> <td>23</td> </tr> <tr> <td>Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion</td> <td>Not listed</td> <td>549</td> </tr> <tr> <td>Zone 9 - PCT 135 Coobah - Western Rosewood low open tall shrubland or woodland mainly on outwash areas in the Brigalow Belt South Bioregion</td> <td>Not listed</td> <td>354</td> </tr> <tr> <td>Zone 10 - PCT 413 Silver-leaved Ironbark - White Cypress Pine - box dry shrub grass woodland of the Pilliga Scrub - Warialda region, Brigalow Belt South Bioregion</td> <td>Not listed</td> <td>250</td> </tr> <tr> <td>TOTAL ECOSYSTEM CREDITS</td> <td></td> <td>40639</td> </tr> </tbody> </table> <p>Notes:</p> <ol style="list-style-type: none"> Credits have been calculated using the Framework for Biodiversity Assessment. Zone 5 vegetation and parts of Zone 6 vegetation are likely to conform with the Poplar Box Grassy Woodland on Alluvial Plains which was listed as a TEC under the EPBC Act in July 2019. As the listing 	Ecosystem Credits			Vegetation Zone and Plant Community Type (PCT) ID and Name	EPBC Act equivalent TEC or habitat of EPBC Act listed threatened species	Number of Credits	Zone 1 - PCT27 (BR233, NA219) Weeping Myall open woodland of the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion	Weeping Myall Woodlands	900	Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gigaiead clay from Pilliga Scrub to Goondiwindi, Brigalow Belt South Bioregion	Brigalow (<i>Acacia harpophylla</i> dominant and codominant)	1223	Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coobah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion	Coolabah - Black Box Woodland of the Darling Riverine Plains and the Brigalow Belt South Bioregions	93	Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion	Natural Grasslands on Basalt and Fine-textured Alluvial Plains of Northern NSW and Southern Qld	20102	Zone 5 - PCT58 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	Not Listed	8851	Zone 6 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)	Not listed	8294	Zone 7 - PCT71 (BR127, NA126) Carbeen – White Cypress Pine - River Red Gum - bloodwood tall woodland on sandy loam alluvial and aeolian soils in the northern Brigalow Belt South Bioregion and Darling Riverine Plains Bioregion	Not listed	23	Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion	Not listed	549	Zone 9 - PCT 135 Coobah - Western Rosewood low open tall shrubland or woodland mainly on outwash areas in the Brigalow Belt South Bioregion	Not listed	354	Zone 10 - PCT 413 Silver-leaved Ironbark - White Cypress Pine - box dry shrub grass woodland of the Pilliga Scrub - Warialda region, Brigalow Belt South Bioregion	Not listed	250	TOTAL ECOSYSTEM CREDITS		40639			
Ecosystem Credits																																											
Vegetation Zone and Plant Community Type (PCT) ID and Name	EPBC Act equivalent TEC or habitat of EPBC Act listed threatened species	Number of Credits																																									
Zone 1 - PCT27 (BR233, NA219) Weeping Myall open woodland of the Darling Riverine Plains Bioregion and Brigalow Belt South Bioregion	Weeping Myall Woodlands	900																																									
Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gigaiead clay from Pilliga Scrub to Goondiwindi, Brigalow Belt South Bioregion	Brigalow (<i>Acacia harpophylla</i> dominant and codominant)	1223																																									
Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coobah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion	Coolabah - Black Box Woodland of the Darling Riverine Plains and the Brigalow Belt South Bioregions	93																																									
Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion	Natural Grasslands on Basalt and Fine-textured Alluvial Plains of Northern NSW and Southern Qld	20102																																									
Zone 5 - PCT58 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	Not Listed	8851																																									
Zone 6 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)	Not listed	8294																																									
Zone 7 - PCT71 (BR127, NA126) Carbeen – White Cypress Pine - River Red Gum - bloodwood tall woodland on sandy loam alluvial and aeolian soils in the northern Brigalow Belt South Bioregion and Darling Riverine Plains Bioregion	Not listed	23																																									
Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion	Not listed	549																																									
Zone 9 - PCT 135 Coobah - Western Rosewood low open tall shrubland or woodland mainly on outwash areas in the Brigalow Belt South Bioregion	Not listed	354																																									
Zone 10 - PCT 413 Silver-leaved Ironbark - White Cypress Pine - box dry shrub grass woodland of the Pilliga Scrub - Warialda region, Brigalow Belt South Bioregion	Not listed	250																																									
TOTAL ECOSYSTEM CREDITS		40639																																									

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations														
	<p>occurred after the controlled action decision was made, ecosystem credits for impacts to the TEC are not required.</p> <p>Table E3: Species Credits to be Retired</p> <table border="1" data-bbox="248 389 808 576"> <thead> <tr> <th colspan="2">Species Credits</th> </tr> <tr> <th>Species</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td>Koala (<i>Phascolarctos cinereus</i>)</td> <td>4556</td> </tr> <tr> <td>Finger panic grass (<i>Digitaria porrecta</i>)</td> <td>858 (by no of individuals) 1287 (by habitat area in ha)</td> </tr> <tr> <td>Creeping tick-trefoil (<i>Desmodium campylocaulon</i>)</td> <td>4752</td> </tr> <tr> <td>Belsons panic (<i>Homopholis belsonii</i>)</td> <td>6630 (by individuals) 2600 (by habitat area in ha)</td> </tr> <tr> <td>TOTAL SPECIES CREDITS</td> <td>20683</td> </tr> </tbody> </table> <p><i>Note: Credits have been calculated using the Framework for Biodiversity Assessment.</i></p>	Species Credits		Species	Number of Credits	Koala (<i>Phascolarctos cinereus</i>)	4556	Finger panic grass (<i>Digitaria porrecta</i>)	858 (by no of individuals) 1287 (by habitat area in ha)	Creeping tick-trefoil (<i>Desmodium campylocaulon</i>)	4752	Belsons panic (<i>Homopholis belsonii</i>)	6630 (by individuals) 2600 (by habitat area in ha)	TOTAL SPECIES CREDITS	20683			
Species Credits																		
Species	Number of Credits																	
Koala (<i>Phascolarctos cinereus</i>)	4556																	
Finger panic grass (<i>Digitaria porrecta</i>)	858 (by no of individuals) 1287 (by habitat area in ha)																	
Creeping tick-trefoil (<i>Desmodium campylocaulon</i>)	4752																	
Belsons panic (<i>Homopholis belsonii</i>)	6630 (by individuals) 2600 (by habitat area in ha)																	
TOTAL SPECIES CREDITS	20683																	
E19	<p>The Proponent may review and update the ecosystem and species credit requirements in Tables E2 and E3, except as required by Condition E25, to reflect the final construction footprint and resulting extent and type of plant community types to be cleared. Amendments to the ecosystem and species credit requirements must be undertaken in consultation with EES and DAWE and submitted to the Planning Secretary for approval within six (6) months after the commencement of construction or as agreed in writing by the Planning Secretary.</p>	<p>An extension to the timeframe for submission of reporting on amendments to the ecosystem and species credit requirements and the final construction footprint required under Conditions E19 and E24, was requested on 25 February 2022. The extension to 30 June 2022, was granted by Jake Shackleton as nominee of the Planning Secretary on 28/02/2022 to facilitate incorporation of feedback from DPE Biodiversity, Conservation and Science Directorate (BCS) and to fully comply with the requirements of Conditions E19 and E24.</p> <p>The June 2022 addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report, Rev 8, 27 June 2022 and the Final Construction Footprint Report – Final Construction Impact Zone Report was submitted to the Department on 30 June 2022.</p> <p>The documents outlined the specified changes to the ecosystem and species credit requirements in Tables E2 and E3.</p>	Compliant															
E20	<p>The review and update of credit requirements must be undertaken by:</p>	<p>The review and update of credit requirements were undertaken using the vegetation mapping, and the extent of impact in the revised development footprint</p>	Compliant															

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>a. using the vegetation mapping, and the extent of impact in the revised development footprint (Table 3.4) in the July 2020 Addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report; and/or</p> <p>b. completing verification surveys to confirm the extent, type and condition of native vegetation to be impacted.</p> <p>Where verification surveys are required, they must be undertaken in consultation with EES. Any additional surveys must be undertaken at the time of year when groundcover is most likely to be predominantly native. If evaluation is not possible at a time when groundcover is most likely to be native, the assumed presence of any relevant species and ecosystems may be applied to conservatively evaluate impacts and associated credit requirements.</p>	<p>(Table 3.4) in the July 2020 Addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report and is outlined in Section 2 and 3 of the June 2022 addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report, Rev 8.</p> <p>Project timeframe constraints precluded further field verification surveys across the increased Additional Disturbance Area, thus these areas were assessed via desktop assessment. A conservative approach was adopted for mapping native vegetation (particularly native grassland) and assumed presence of species credit habitat was applied.</p>		
E21	<p>The Proponent must submit to the Planning Secretary for information a copy of the Credit Retirement Report for the retirement of the ecosystem and species credits required by Condition E18 within one month of receiving the report.</p>	<p>The Credit Retirement Report has not yet been completed during the audit period.</p>	Not triggered	
E22	<p>Re-use of Timber Prior to vegetation clearing, the Proponent must consult with community and landcare groups and government agencies to determine if retained timber and root balls can be reused in habitat enhancement and rehabilitation work, before pursuing other disposal options. The retained timber and root balls may be used on or off the CSSI site.</p>	<p>Consultation occurred within first few weeks with Landcare and DPI Fisheries. Email evidence was observed of consultation with Environment NSW, DPIE and Landcare.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations																
E23	<p>Koala Habitat</p> <p>The Proponent must reduce the area of koala habitat, identified in Table E4, that is impacted by the CSSI by at least 25%, or as otherwise agreed by the Planning Secretary.</p> <p>Table E4: Vegetation zones/plant community types identified as koala habitat</p> <table border="1"> <thead> <tr> <th>Vegetation Zone and Plant Community Type (PCT) ID and Name</th> <th>Total Area Impacted (ha)</th> </tr> </thead> <tbody> <tr> <td>Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gillgaied clay from Pilliga Scrub to Goondwindi, Brigalow Belt South Bioregion</td> <td>17.31</td> </tr> <tr> <td>Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coobah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion</td> <td>1.74</td> </tr> <tr> <td>Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion</td> <td>0.08 (scattered trees)</td> </tr> <tr> <td>Zone 5 - PCT56 (BR186, NA182) Poptar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW</td> <td>143.95</td> </tr> <tr> <td>Zone 6 - PCT56 (BR186, NA182) Poptar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)</td> <td>0.35 (scattered trees)</td> </tr> <tr> <td>Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion</td> <td>11.82</td> </tr> <tr> <td>Total Area Impacted</td> <td>175.25</td> </tr> </tbody> </table>	Vegetation Zone and Plant Community Type (PCT) ID and Name	Total Area Impacted (ha)	Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gillgaied clay from Pilliga Scrub to Goondwindi, Brigalow Belt South Bioregion	17.31	Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coobah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion	1.74	Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion	0.08 (scattered trees)	Zone 5 - PCT56 (BR186, NA182) Poptar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	143.95	Zone 6 - PCT56 (BR186, NA182) Poptar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)	0.35 (scattered trees)	Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion	11.82	Total Area Impacted	175.25	<p>The June 2022 addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report, Rev 8, 27 June 2022 and the Final Construction Footprint Report – Final Construction Impact Zone Report was submitted to the Department on 30 June 2022.</p> <p>Overall, the koala habitat has been reduced by approximately 58% as part of the IFC CIZ Development Footprint (74.28 ha of koala habitat impacted) when compared to the approved SPIR CIZ Development Footprint (175.25 ha of koala habitat impacted). As a result, condition E23 has been satisfied as detailed in the DPE Conditions of Approval of Inland Rail – Narrabri to North Star Phase 1 (SSI 7474 – 13 August 2020).</p>	Compliant	Ensure next revision of BMP contains updated values for Table E4.
Vegetation Zone and Plant Community Type (PCT) ID and Name	Total Area Impacted (ha)																			
Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gillgaied clay from Pilliga Scrub to Goondwindi, Brigalow Belt South Bioregion	17.31																			
Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coobah - Lignum woodland wetland of frequently flooded floodplains mainly in the Darling Riverine Plains Bioregion	1.74																			
Zone 4 - PCT52 (BR191, NA187) Queensland Bluegrass +/- Mitchell Grass grassland on cracking clay floodplains and alluvial plains mainly the northern-eastern Darling Riverine Plains Bioregion	0.08 (scattered trees)																			
Zone 5 - PCT56 (BR186, NA182) Poptar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	143.95																			
Zone 6 - PCT56 (BR186, NA182) Poptar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW (Derived - Native Grasslands)	0.35 (scattered trees)																			
Zone 8 - PCT 78 River Red Gum riparian tall woodland / open forest wetland in the Nandewar Bioregion and Brigalow Belt South Bioregion	11.82																			
Total Area Impacted	175.25																			
E24	<p>The Proponent must submit a report on the final construction footprint demonstrating how impacts to the plant community types identified in Table E4 have been reduced. This must be provided to the Planning Secretary, EES and DAWE for information, within six (6) months after the commencement of construction or as agreed by the Planning Secretary.</p>	<p>An extension to the timeframe for submission of reporting on amendments to the ecosystem and species credit requirements and the final construction footprint required under Conditions E19 and E24, was requested on 25 February 2022.</p> <p>The extension to 30 June 2022, was granted by Jake Shackleton as nominee of the Planning Secretary on 28/02/2022 to facilitate incorporation of feedback from DPE Biodiversity, Conservation and Science Directorate (BCS) and to fully comply with the requirements of Conditions E19 and E24.</p> <p>The Final Construction Footprint Report – Final Construction Impact Zone Report was submitted to the Department on 30 June 2022.</p>	Compliant																	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E25	The Proponent must provide a minimum of 4556 species credits to offset impacts to the koala.	The requirement to provide offset requirements has not been triggered during the audit period. The species credits required have been refined in the June 2022 addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report, Rev 8, 27 June 2022 with 1931 species credits now required to offset impacts to the koala.	Not triggered	
E26	The offset credits required by Condition E25 must be sourced where practicable, from: <ul style="list-style-type: none"> a. The same IBRA subregion as the impacted site, or b. The adjoining IBRA subregions within the same IBRA region as identified in (a). 	The requirement to provide offset requirements has not been triggered during the audit period.	Not triggered	
FLOODING				
E27	<p>Quantitative Design Limits (QDLs)</p> <p>The CSSI must meet the QDLs in Appendix A – FLOODING QUANTITATIVE DESIGN LIMITS AND MODELLING REQUIREMENTS. Unless otherwise noted, these QDLs apply outside the rail corridor except for level crossings. These QDLs apply in any flood event up to and including the 1% AEP, and in any duration.</p> <p>In circumstances where the CSSI does not meet the QDL at a specific location, the Proponent must achieve compliance through modified design of the CSSI. If this is not possible or practical the Proponent must:</p> <ul style="list-style-type: none"> a. document the extent of the non-compliance with the QDL and justify why it is not possible or practical to achieve compliance through CSSI design changes; b. in every instance of non-compliance with the QDLs, consult with and obtain agreement from the affected land or property owners to either: <ul style="list-style-type: none"> i. the non-compliance; or ii. establish an alternative level of mitigation of impacts for that location through alternative design measures; 	<p>Compliance with the Quantitative Design Limits is outlined in Section 5.3.2 of the Flood Design Verification Report for Phase1 Issued for Construction, dated 05/07/2022 (Rev 0, Doc No. 3-0001-260-IHY-00-RP-0006).</p> <ul style="list-style-type: none"> • Consultation on drainage and flooding issues has been undertaken in two stages: Stage 1: Undertaken during the Reference design stage, 50%, 70% and 100% in Phase 1. Consultation began in November 2019 and ended in January 2020. See Table 6.2. • Stage 2: undertaken after the CoA and associated QDLs were received in May 2021 with the majority of the consultation being completed by July 2021. See Table 6.2 and 6.4 for non-compliance, mitigation (if required) and if accepted by 	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> c. where an alternative level of mitigation of impacts is required for a location, achieve a level of mitigation through design measures beyond the rail corridor; and d. describe and detail the mitigation measures in the Flood Design Verification Report required by Condition E28; 	<p>landowner. For ongoing consultation see Section 6.4.6.</p> <p>All agreements for mitigation measures pending agreement after Stage 2 outlined in Table 6.7 of the FDVR have now been acquired.</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.</p> <p>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.</p> <p>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; 	<p>Compliance with the Quantitative Design Limits is outlined in Section 5.3.2 of the Flood Design Verification Report for Phase1 Issued for Construction, dated 05/07/2022 (Rev 0, Doc No. 3-0001-260-IHY-00-RP-0006).</p> <p>Section 4 outlines the flood modelling methodology used for preparing the FDVR. Section 5 outlines the flood impact assessment.</p> <p>Section 4.6.2 and Appendix I outline and contain the independent peer review.</p> <p>The Department granted an extension to this timeframe on 11 November 2021, bringing the date for resubmission of the FDVR to 17 January 2022. A subsequent extension for submission of the FDVR was requested on 22 December 2022 and was granted on 13 January 2022. The new submission date for the updated FDVR was 4 February 2022 as approved by Matthew Todd-Jones as nominee of the Planning Secretary.</p>	Compliant	Attach the Department approval letter of the FDVR in Appendix.

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>f. mitigation and management measures that will be undertaken if the QDLs are exceeded, as specified in Condition E27;</p> <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>ARTC appointed BMT as an External Independent Peer Reviewer of the FDVR. The Independent Peer Review is contained in Appendix I of the FDVR.</p> <p>IRDJV have completed all sensitivity tests recommended by the Peer Reviewers and a document providing the results of the sensitivity tests and a full response to the review comments is also included in Appendix I. The results show that the design performs as intended and within reasonable tolerances when key parameters such as</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> 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; b. assess the establishment, calibration, validation and operation of the flood model items as per (a); 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; d. document the review findings including specifically responding to Condition E28(a) to E28(i) 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: <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> <p><i>Note: The independent reviewer must have extensive experience with the software packages applied in the modelling for the SPIR and the Flood Design Verification Report, although this may not necessarily include the specific software version(s) used in the SPIR and Flood Design Verification Report, provided the software version updates are not relevant to the peer review.</i></p>	<p>structure blockage and hydraulic roughness are varied.</p> <p>As part of Narrabri Shire Council's review of this report, Council's flood consultant also undertook a review of the flood models. This review raised similar queries to BMT's review and suggested the same suite of sensitivity tests. The work document in Appendix I to address BMT's review comments therefore also address queries and suggestions raised by Council's flood consultant.</p> <p>The Independent Peer Review concluded that the investigations to date have presented clear guidance for the detailed design requirements and landowner consultation to enable the final design for construction to achieve an acceptable outcome for all parties.</p>		

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
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>The Flood Emergency Response Plan was prepared by WSP is contained in Appendix H of the FDVR.</p> <p>Section H2.2 states that the residual flood risk to the rail corridor after the upgrade is acceptable, with no occurrences of high risk and only six occurrences of medium risk.</p>	Compliant	
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; b. consideration of changes to flood behaviour that may result from CSSI infrastructure failures or embankment collapses where these may occur during floods; c. provision of sufficient detail and scope to enable the relevant personnel or agency (including the NSW SES, the 	<p>Information to Facilitate Management of Flood Emergency Risks beyond the Rail Corridor is outlined in the FDVR.</p> <p>Section 5.3.2 documents the changes to all flood parameters beyond the rail corridor and compliance against the QDLs. Section 5.4 and Appendix L document the impact of the CSSI under extreme events, including an assessment of where rail embankment failure could occur and implications for downstream land uses.</p> <p>Section 5.4 provides an overview of the consultation process with agencies involved in flood emergency management and Section 6 provides details of the consultation undertaken and</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>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>	<p>ARTC's commitments to providing outputs from this study to facilitate updates to existing agency management plans.</p>		
E32	<p>Flood Review after Construction</p> <p>For the first 15 years of operation, the Proponent must prepare Flood Review Report(s) within three months after the first defined flood event for any of the following flood magnitude ranges that occur – the 1-5% AEP, 5-10% AEP and 10-20% AEP events. The Flood Review Report(s) must be prepared by a suitably qualified and experienced hydrologist(s) and include:</p> <ul style="list-style-type: none"> a. a comparison of the observed extent, level, and duration of the flooding event against those predicted in (or inferred from) the SPIR and the Flood Design Verification Report required by Condition E28; b. identification of the properties and infrastructure affected by flooding during the reportable event; and c. where the observed extent and level of flooding or other flooding or erosion impacts exceed those predicted due to the CSSI with the consequent effect of adversely impacting on property(ies), structures, infrastructure or the environment, and/or exceed the requirements specified in Conditions E27 and E28: <ul style="list-style-type: none"> i. determine if the exceedance is attributable to the CSSI, and ii. where the cause is attributable to the CSSI, identification of the rectification measures that would be implemented to reduce future adverse impacts of flooding from similar events related to the CSSI works, including the timing and responsibilities for implementation. 	<p>Not triggered, the project has not been in operation during the audit period.</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>A copy of the Flood Review Report(s) must be submitted for information to the Secretary and EES and relevant council(s) within three (3) months of finalising the report.</p> <p>Any rectification measures identified within the Flood Review Report(s) must be developed in consultation with the affected third parties (e.g. land and property owners, infrastructure owners, EES, the relevant council(s), state and local government agencies, etc) and implemented within the timeframes specified in the Flood Review Report(s) or as agreed with the affected parties.</p>			
E33	<p>To analyse the lengths of rail corridor impacted by rainfall and consequential flood events for the purposes of Condition E32, the Proponent must develop spatially defined monitoring zones and associated monitoring methodologies for the flood catchments modelled in the SPIR. The monitoring methodologies shall provide an approach to inter rainfall intensities utilising the available Bureau of Meteorology rainfall monitoring stations suitable for each catchment. The methodology must be developed in consultation with DPIE and submitted to the Planning Secretary for information within six (6) months prior to the commencement of operation of the CSSI.</p>	Refers to operational phase.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E34	<p>Information Sharing</p> <p>Flood information resulting from the requirements of this approval, including flood reports, models and geographic information system outputs, and work as executed information from a registered surveyor certifying finished ground levels and the dimensions and finished levels of all structures within flood prone land, must be made available to the relevant council(s), TfNSW, EES and the SES upon request. The relevant councils, TfNSW, 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 a relevant council, TfNSW, EES or the SES must be provided within six (6) months.</p>	Refers to post-construction requirements.	Not triggered	
WATER QUALITY AND DRAINAGE				
E35	<p>The CSSI must be designed, constructed, and operated so as to:</p> <ul style="list-style-type: none"> a. maintain the NSW Water Quality Objectives where they are being achieved as at the date of this Approval; b. contribute towards achievement of the NSW Water Quality Objectives 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 Water Quality Objectives, in which case those requirements must be complied with; c. ensure all drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) new or modified surface water drainage (including cess drains) and depressions are designed and constructed in accordance with relevant guidelines; d. locate all scour protection works associated with replacement culverts or the construction of new culverts within the rail corridor, or as agreed to by the relevant landowner; 	<p>A number of overtopping events have been recorded during the audit period. While overtopping events have been reported, the piling pads were constructed to the meet design criteria for the nominated rainfall event. Overtopping events exceeded the approved design rainfall and runoff volume in each case.</p> <p>It is noted that most of the piling works are complete or near completion.</p>	Compliant	It is recommended that the hydraulic model is continued to be reviewed considering the observations and data obtained during recent rain events.

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> e. not result in changes to the direction of watercourses or the direction of flood flows except within the rail corridor, other than as agreed with the landowner; f. ensure that there is no permanent interception of, and/or connection with, groundwater; g. ensure all discharges from new or modified surface drainage (including cess drains) adjacent to the new and upgraded track are released at a controlled rate to prevent scour; h. ensure works on waterfront land are undertaken in accordance with the NRAR guidelines for controlled activities on waterfront land; <p>ensure that any recycled wastewater (including recycled/treated water) proposed for use by the CSSI, is fit for purpose and does not pose a risk to human health or the receiving environment.</p>			
E36	The Proponent must consult with TfNSW in relation to stormwater and drainage management to coordinate drainage infrastructure with the Newell Highway Upgrade.	<p>Details concerning the design implications of any associated flooding impacts have been shared with and discussed with Transport for New South Wales (TfNSW) on an ongoing basis since as early as 2018.</p> <p>Engagement between ARTC and TfNSW has been achieved via meetings, both in person and via teleconference, delivery of presentations by ARTC to TfNSW to outline the scope of the N2NS Phase 1 Project and via the provision of electronic information such as reports, infrastructure design models and flood models. Evidence of this consultation was sighted during the audit.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E37	<p>Prior to the installation of a new culvert, the Proponent must consult with the landowner that is located immediately downstream of the new culvert to determine the potential for impacts on agricultural productivity, farm operations and farm dams (including changes in water supply yield, reliability of supply, flood flows and embankment stability) due to the introduction or alteration of flows. Where potential adverse impacts are identified, the Proponent must consult with the affected landowner on the management measures that will be implemented to mitigate the impacts.</p>	<p>Consultation on a range of issues, including culvert design and impact was undertaken during design, and this is outlined in the SP1 IFC Detailed Design Report prepared by WSP/Mott McDonald dated May 2019.</p> <p>Consultation on drainage and flooding issues has been undertaken in two stages:</p> <ul style="list-style-type: none"> • Stage 1: Undertaken during the Reference design stage, 50%, 70% and 100% in Phase 1 Consultation began in November 2019 and ended in January 2020. See table 6.2. • Stage 2: undertaken after submission of the draft FDVR and change in QDLs from the DPE. The CoA was received in 2021. Stage 2 Consultation began in May 2021 with the majority of the consultation being completed by July 2021. • Ongoing consultation is outlined in Section 6.4.6 of the FDVR report 	Compliant	
TRAFFIC, TRANSPORT AND ACCESS				
E38	<p>Construction traffic must not use local roads or privately-owned roads (other than to avoid direct access from ancillary facilities and construction sites to the Newell Highway) unless no alternative access is available. Use of private access roads must be in accordance with Conditions A19 and A20. Local or privately owned roads used for access to ancillary facilities and construction sites must be identified in the Construction Traffic, Transport and Access Management Sub-plan required by Condition 0.</p>	<p>Local and privately owned roads used for access to ancillary facilities and construction sites are identified in the Construction Traffic, Transport and Access Management Plan (2600-0018 N2NS-SP1).</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E39	Before any local or private 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(ies) and landowners within one (1) month of completion of the survey and at least two weeks before the road is used by heavy vehicles associated with the construction of the SSI.	A sample of dilapidation reports were observed for sites during the audit period including the following: Narrabri Shire - Gazetted and Local Roads Dilapidation Report section 3 – From Newell Hwy at Uni NSW, Kamilaroi Hwy and Grain Valley Road, South of Boggabri prepared for trans4m rail 28/04/2022.	Compliant	
E40	If damage to roads occurs as a result of the construction of the CSSI, the Proponent must, within six months of the completion of construction, either (at the landowner or relevant road authority's discretion): <ul style="list-style-type: none"> a. compensate the relevant road authority(ies) and landowner for the damage so caused. The amount of compensation may be agreed with the relevant road authority(ies) and landowners, but compensation must be paid even if no agreement is reached; b. rectify the damage to restore the road to at least the condition it was in at the time of the dilapidation survey; or where other agreements are in place, leave, maintain or remunerate for damages to these roads in accordance with these agreements.	Not triggered during the audit period all sites still under construction. Evidence noted of positive proactive road repairs by Trans4m and ARTC through responding to complaints rough surface and damaged culverts on County Boundary Road, Crooble. This was followed up by both Council engineering staff and Trans4m construction staff repairing the structure, with Council supplying materials and Trans4m supplying plant and labour.	Not triggered	
E41	Where bus stops (including school bus stops) are required to be temporarily closed or relocated during construction, such closure must not occur until relocated bus stops are functioning and are within 400 metres of the original bus stop. The relocation of bus stops must be undertaken in consultation with the relevant council and bus operator, and details regarding the relocations provided to affected communities (and educational facilities in relation to school bus stops) at least 14 days prior to the relocation occurring.	Relocation of bus stops not required during the audit period.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E42	<p>The Proponent must consult with TfNSW prior to, and at regular intervals during, construction to co-ordinate and implement mitigation measures to reducing any potential concurrent impacts arising from the construction of the CSSI and Newell Highway upgrade works. Procedures for consultation must be outlined in the Traffic, Transport and Access Management Sub-plan required by Condition 0.</p>	<p>Fortnightly meeting w/Fulton Hogan T4MR Traffic Engineer regular meetings with FH & TfNSW</p> <p>N2NS Project Director & IR Senior Commercial Manager Workstream 1 regular meetings to discuss MIRDA agreements, LX etc</p> <p>Procedures for consultation are outlined in Section 2 of the Traffic, Transport and Access Management Sub-plan.</p>	Compliant	
E43	<p>Level Crossing Treatment Reports</p> <p>In order to maintain safe and efficient operation of the road network, the Proponent must prepare a Public Level Crossing Treatment Report in consultation with Transport for NSW and relevant councils. The report must:</p> <ol style="list-style-type: none"> illustrate the location of all public level crossings which traverse the CSSI; list, and identify on a figure, any public level crossings that will be closed or upgraded, including the type of treatment proposed where a level crossing is to be upgraded; where no works are proposed at a public crossing, provide reason for the decision; consider measures to avoid potential short-stacking at level crossings; and provide justification for any proposed closures. <p>The assessment of level crossings must utilise the Australian Level Crossing Assessment Model (ALCAM). The process for determining the type of level crossing treatment must be consistent with the methodology outlined in Appendix L of the Submissions Preferred Infrastructure Report.</p> <p>The report must also include an assessment of the road risks, consistent with the guideline Railway Crossing Safety Series 2011, Plan: Establishing a Railway Crossing Safety Management Plan (NSW Roads and Traffic Authority, 2011).</p>	<p>The Narrabri to North Star (Phase 1) Public Level Crossing Treatment Report (0-0000-900-PAD-00-TE-0014) has been prepared to maintain safe and efficient operation of the road network.</p> <ol style="list-style-type: none"> Appendix B illustrates the location of all public level crossings on the CSSI. Appendix B and C outlines the level crossings to be upgraded and closed including the proposed treatments. The proponent is completing works at all public level crossings within the CSSI. Mitigation measures to avoid potential short-stacking risks at level crossings is outlined in Section 3.2 and Section 3.3. The methodology for assessment of the potential traffic and other impacts of closing level crossings undertaken is outlined in Section 6.2. Specific – Level Crossing Closure Considerations are outlined in Appendix D. 	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>The design of any level crossing on a public road must be endorsed by Transport for NSW or the relevant road authority (where not Transport for NSW) prior to commencing construction of that crossing.</p>	<p>The assessment of level crossings followed the required methodology consistent with Appendix L of the SPIR and, is detailed in Section 6. Further detail is included in Appendix C.</p> <p>The assessment of road risks consistent with the required guideline is included in appendix E.</p> <p>Evidence of endorsement by Transport for NSW for the design of any level crossing on a public road was provided during the audit period (WST20/00266/01 dated 21/08/2020).</p>		
E44	<p>In order to maintain convenient property access, the Proponent must prepare a Private Level Crossing Treatment Report in consultation with landowners whose access will be affected by the closure or upgrading of a private level crossing. The report must:</p> <ul style="list-style-type: none"> a. illustrate the location of all private level crossings which traverse the CSSI; b. list, and identify on a figure, any private level crossings that will be closed or upgraded; c. describe the treatments that will be implemented at upgraded crossings; and d. provide justification for any proposed closures and types of treatment, including decisions where no additional treatments are proposed; and e. provide details on the consultation undertaken with the landowners. <p>Closures, relocations or modifications of private level crossings must be agreed to by the relevant landowner prior to any work on a crossing, noting that any closure, relocation or modification must be in accordance with AS/RISSB 7658:2012 Railway Infrastructure – Railway Level Crossing and relevant rail safety legislation. The Proponent must consult with relevant landowners</p>	<p>The Narrabri to North Star Private Level Crossing Treatment Report – Phase 1 (3-0000-260-CXR-00-RP-0003) has been prepared in consultation with landowners whose access will be affected by the closure or upgrading of a private level crossing.</p> <ul style="list-style-type: none"> a. Appendix A illustrates the location of all private level crossings which traverse the CSSI. b. Appendix A and Appendix B outline the level crossings to be upgraded and closed. c. Appendix B outlines the level crossings to be upgraded and the type of treatment planned. This is also addressed in Section 7. d. Detailed justification for proposed closures is included in Section 8 and Appendix C. e. Section 4 outlines the consultation activities undertaken to date with 	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>on the design of the crossing and where consistent with relevant safety standards and legislation, incorporate landowner requirements into the design.</p>	<p>landowners to address feedback and consider requests.</p> <p>Section 4 demonstrates the consultation strategy. All closures, relocations and modifications will be agreed with landholders prior to Construction. The community consultation tracking spreadsheet was sighted during interview with the Trans4m Rail communication team on site.</p> <p>Section 5 gives a list of design standards that were used to design each level crossing which includes AS/RISSB 7658:2012 Railway Infrastructure – Rail Level Crossing.</p>		
E45	<p>The Public Level Crossing Treatment Report and Private Level Crossing Treatment Report must be submitted to the Planning Secretary for information at least one (1) month prior to the closure or upgrade of a public or private level crossing, as relevant. Individual reports may be submitted for each crossing or address a group of crossings or the entire CSSI.</p>	<p>The Public Level Crossing Treatment Report was submitted to the Planning Secretary on 09/03/2021.</p> <p>The Private Level Crossing Treatment Report was submitted to the Planning Secretary on 12/02/2021.</p>	Compliant	
E46	<p>Level Crossing Performance Report</p> <p>In 2026 and 2035, or as otherwise agreed by the Planning Secretary, the Proponent must prepare a Level Crossing Performance Report to confirm the operational traffic impacts of the level crossings on the classified road network. The review of the operation of the level crossings that interact with the classified road network must be carried out in consultation with TfNSW and the relevant councils and include:</p> <ul style="list-style-type: none"> a. updated traffic analysis of movements on these roads; b. assessment of the level of service at these level crossings (queue length, queuing time delay); c. identification of additional new works outside of the rail corridor delivered by third parties that may result in changes to traffic movements as initially considered in the Level Crossing Treatment Report; 	<p>Not triggered during the audit period.</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> d. assessment of the performance of the level crossing treatment outlined in the Public Level Crossing Treatment Report required by Condition E43; e. all reported near misses and collisions at level crossings within the project area; and mitigation measures to manage any actual or predicted road network performance impacts.			
E47	Each Level Crossing Performance Report must also review the impact on level crossings interacting with local roads and include: <ul style="list-style-type: none"> a. assessment of safety and/or operational impacts on nearby classified roads as a result of vehicle queuing; and b. all reported near misses and collisions at level crossings within the project area. 	Not triggered during the audit period.	Not triggered	
E48	Mitigation measures to manage any actual or predicted road network performance impacts resulting from the construction and operation of the CSSI must be implemented within one year of the completion of each report. The Report must include an implementation plan of the identified mitigation measures. The Level Crossing Performance Report must be submitted to the Secretary, RMS and relevant councils for information within 60 days of its completion. <i>Note: 2026 and 2035 are specified as representing 12 months and 10 years after the anticipated commencement of operation of the entire Inland Rail project. Should this timeframe change, the Proponent should seek the approval of the Planning Secretary to vary the timeframe in which to satisfy this condition.</i>	Not triggered during the audit period.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E49	<p>Property Access No part of any crossing loop may cross over any driveway, private road or public road unless decided in consultation with the relevant landowner and any other adjacent landowner whose access is impacted by the crossing loop.</p>	No crossing loops cross over any driveway, private road, or public road.	Not triggered	
E50	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.	Access was observed to be maintained to properties during the site inspection. There is a Gil Gil Creek alternative access arranged with Gwydir Council that was implemented during the audit period.	Compliant	
E51	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.	Evidence provided outlining the agreements with properties that have had restricted access requiring temporary alternative access during the audit period due to the EG Ballast train through LX's.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E52	<p>Where construction of the CSSI restricts the ability of a resident or landowner to access other parts of their property via a level crossing, the Proponent must, until the permanent level crossing is reinstated, supply the property with a temporary alternate level crossing access at a convenient location decided through consultation with the landowner, at no cost to the property landowner, unless otherwise agreed with the landowner. This can include other existing level crossings or a new alternative temporary level crossing access that is both safe and agreed to.</p>	<p>Evidence provided outlining the agreements with properties that have had restricted access requiring temporary alternative access during the audit period due to the EG Ballast train through LX's. Notification statements observed indicating alternative access arrangements are provided.</p>	Compliant	
E53	<p>Road Safety The CSSI (including any new overbridges, new or modified roads, and new or modified level crossings) must be designed to meet relevant design, engineering and safety guidelines, including the Austroads Guide to Traffic Management. The design of any new road overbridges or new or modified roads must be developed in consultation with the relevant roads authority prior to construction of the new road overbridges or new or modified roads.</p>	<p>The CSSI has been designed to meet relevant design, engineering, and safety guidelines, including the Austroads Guide to Traffic Management.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E54	<p>For all new overbridges, new or modified roads, and new or modified level crossings provided as part of the CSSI, the Proponent must undertake a Safe System Assessment in accordance with the Austroads Safe System Assessment Framework and Austroads Guide to Traffic Management Part 13: Safe Systems Approach to Transport Management in consultation with the relevant roads authority.</p> <p>For all areas identified by the Safe Systems Assessment as requiring further assessment, an independent Road Safety Audit is to be undertaken by an appropriately qualified and experienced person in accordance with the Austroads Guide to Road Safety Part 6: Road Safety Audits. Audit findings and recommendations must be actioned before construction of the relevant infrastructure and must be made available to the Planning Secretary on request.</p>	Not triggered during the audit period.	Not triggered	
E55	<p>Pedestrian and Cyclist Access</p> <p>Safe pedestrian access must be maintained around work sites during construction. In circumstances where pedestrian and cyclist access is restricted or removed due to construction activities, an alternate route which complies with the relevant standards must be provided and signposted.</p>	Safe pedestrian access was observed around work sites during the site inspection.	Compliant	
E56	<p>Transport Network and Connectivity Analysis (Jones Avenue Overbridge)</p> <p>The design and location of new road and road bridge components of the CSSI must not introduce into or increase by way of redistribution heavy vehicle movements through the residential and commercial areas of Moree. This objective must inform the comparative analysis of alternative overbridge locations required by Condition E57.</p>	MPSC and RDC have undertaken this as part of the Transport and Traffic assessment for the Moree SAP (Arcadis, 2020).	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E57	<p>The Proponent must undertake a comparative analysis of an alternative location(s) for grade-separated road and active transport crossings of the rail corridor as an alternative(s) to the Jones Avenue overbridge.</p> <p>This analysis must focus on the area to the south of Moree Airport, or other location(s) identified through the Moree Special Activation Precinct (SAP) investigations and as agreed by the Planning Secretary.</p> <p>The analysis must consider:</p> <ul style="list-style-type: none"> a. consistency with future land use planning for Moree, with a particular focus on the proposed Special Activation Precinct and Moree Intermodal projects to the south of Moree; b. the local and regional traffic network, including operational efficiency, and connectivity to existing and future local and regional road networks; c. the ability for use by a range of heavy vehicles and compliance with relevant road design standards; d. community safety and severance impact of formal or informal changes to heavy vehicle routes; e. a risk assessment of the impacts on emergency services in accessing the community in required timeframes in the event level crossings are blocked in Moree; f. consideration of the environmental impacts of a relocated bridge, having regard to the CSSI's Secretary's Environmental Assessment Requirements (SEARs) dated 8 November 2016; and g. the requirements of Condition E58. 	<p>A risk assessment was conducted with representatives of the Moree Emergency services on accessing the Moree East community if level crossings are blocked in Moree. The risk assessment can be found in Appendix B of the attached Traffic Connectivity Report and the outcomes of the risk assessment are outlined in Section 4.2 of the report.</p>	Not triggered	
E58	<p>The Proponent's analysis required by Condition E57 E56 above must consider active transport rail crossings between Moree Railway Station and Bullus Drive to address severance impacts caused by the proposal. This analysis must include:</p> <p>potential community severance caused by the proposal;</p> <ul style="list-style-type: none"> a. pedestrian and cyclist movement patterns, existing as well as those associated with future infrastructure or strategic planning initiatives being undertaken in the locality; 	<p>Analysis of this condition has taken place through the Needs Assessment and Risk Assessment of community severance occurring between Moree East and Moree CBD with installation of rail exclusion fencing. A desire line to cross the rail / transport corridor has been identified. It is recommended that consideration be given to</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<p>b. measures to minimise informal rail corridor crossings; and</p> <p>c. an assessment of potential crossings that considers:</p> <ul style="list-style-type: none"> i. demand for a crossing in that location; ii. the distance between formal rail crossings; iii. rail safety requirements; iv. accessibility in accordance with the Disability Discrimination Act 1992; v. pedestrian safety and security, including Crime Prevention Through Environment Design (CPTED); and <p>pedestrian access during extended severance events, including a train breakdown blocking level crossings.</p>	<p>the feasibility of implementing suitable solutions to address this issue including investigating the feasibility of installing a walking path and active pedestrian crossings to link Moree East with the remainder of the community. Further detail can be found in the report section 4.3.</p>		
E59	<p>The analysis required by Conditions E57 and E58 must be prepared in consultation with Moree Plains Shire Council, Transport for NSW, the Special Activation Precinct Team within the Department of Planning, Industry and Environment, emergency services, the affected community, including but not limited to the Moree Local Aboriginal Land Council and the East Moree community. Evidence of such consultation must be provided as part of the analysis.</p> <p>The analysis must clearly justify the chosen bridge location and be undertaken prior to construction of the Jones Avenue bridge or within one year of project determination (whichever is earlier). The analysis must be provided to the Planning Secretary for approval or form part of a project modification under section 5.25 of the EP&A Act.</p> <p>The approved crossings (including vehicular, cycle and pedestrian crossings) must be completed by 2025, unless otherwise approved by the Planning Secretary.</p> <p><i>Note: 2025 is specified as the anticipated commencement of operation of the entire Inland Rail project. Should this timeframe change, the Proponent should seek the approval of the Planning Secretary to vary the completion date of the crossings.</i></p>	<p>Not triggered during the audit period.</p>	<p>Not triggered</p>	
SPOIL MOUNDS				
E60	<p>Permanent spoil mounds are to be located:</p> <ul style="list-style-type: none"> a. within the existing rail corridor; 	<p>All permanent spoil mounds were observed to be located within the rail corridor in</p>	<p>Compliant</p>	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
	<ul style="list-style-type: none"> b. at least 50 metres from any watercourse or culvert or where the rail formation is predicted to be overtopped during a flood event; c. at least 500 metres from any residence; and d. outside the drip lines of trees located on private property. <p><i>Note: For the purpose of Condition E60(d), the Proponent must not affect trees outside of the rail corridor for the purpose of preventing those trees' driplines overhanging spoil mounds.</i></p>	<p>appropriate locations during the site inspection.</p> <p>Details of the permanent spoil mound management are outlined in the Construction Soil and Water Management Sub-Plan (2600-0018 N2NS-SP1).</p>		
E61	<p>Spoil mounds are to comply with the following requirements:</p> <ul style="list-style-type: none"> a. maximum height must not exceed the top height of the upgraded rail line; b. not result in the clearing or covering of native vegetation beyond that described in the documents listed in Condition A1; c. not result in heritage impacts beyond that described in the documents listed in Condition A1; d. not result in additional changes to the upstream flooding regime beyond those described in the documents listed in Condition A1; e. not affect the downstream flood regime; f. not impede the flow of water through culverts; g. not contain any contaminated soil classified as unsuitable for the proposed land use, acid sulphate soils or green waste; h. are to be stabilised during construction of the CSSI; and are to be stabilised prior to operation of the CSSI. 	<p>Spoil mounds were observed to be generally compliant with the condition requirements.</p> <p>Details of spoil mound management are outlined in the Construction Soil and Water Management Sub-Plan (2600-0018 N2NS-SP1).</p>	Compliant	
VISUAL AMENITY				
E62	<p>The construction and operation of the parts of the CSSI located within 200 kilometres of the Siding Spring Observatory, must comply with the 'Good Lighting Design Principles' as described in the Department's 'Dark Sky Planning Guideline'.</p>	<p>A number of construction works have occurred within the 200km radius of the Siding Spring Observatory during the audit period. No night works have been undertaken during the audit period.</p> <p>The N2NS P1 Lighting Audit June 2022 provided an assessment of compliance against the Good Lighting Design Principles</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>in Table 3. The assessment found that the development is complying with the Good Lighting Design Principles.</p>		
E63	<p>The Proponent must construct and operate the CSSI with the objective of minimising light spillage to residences. All lighting associated with the construction and operation of the CSSI must be consistent with the requirements of Australian Standard 4282-1997 Control of the obtrusive effects of outdoor lighting. Notwithstanding, the Proponent must provide mitigation measures to manage any residual night-lighting impacts to protect residences adjoining or adjacent to the CSSI, in consultation with affected landowners.</p>	<p>This Environmental Design Requirement was considered in the SP1 IFC Detailed Design Report prepared by WSP/Mott McDonald dated May 2019. To be further reviewed as construction continues.</p> <p>The N2NS P1 Lighting Audit June 2022 provided an assessment of compliance against C63.</p> <p>ARTC was observed to be constructing the CSSI with the objective of minimising light spillage to residences as evidence by their compliance with the Good Lighting Design Principles.</p> <p>The nearest sensitive receptor to the project alignment is 645m away and it is not likely that any lighting within the Project will have an obtrusive impact on residents within this dwelling. Features that minimise light obtrusion impacts include distance, landscape elevation and natural obstructions, and natural terrain.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E64	The Proponent must consult with all landowners whose visual amenity from their residence is identified as highly impacted by the CSSI (as per Table 5 of Technical Report 10 in the EIS) to determine the mitigation measures that will be implemented to maintain visual amenity. The Proponent must come to an agreement with the landowner on the mitigation measures and implement the measures prior to the operation of the CSSI.	This Environmental Design Requirement was considered in the SP1 IFC Detailed Design Report prepared by WSP/Mott McDonald dated May 2019. To be further reviewed as construction continues and is not triggered during the audit period.	Not triggered	
HERITAGE				
E65	The Proponent must not destroy, modify or otherwise physically affect any heritage items, including Aboriginal objects, outside of the CSSI construction boundary.	<p>The CIZ was generally delineated with the use of barrier tape and signage. Site inspections of construction areas identified that no disturbance had occurred outside the delineated construction areas during construction works.</p> <p>Incident EVT-0000168 - CH740.500 & CH740.200_South of Yallaroi Creek_ ARTC's Heritage Consultant potentially salvaged items outside the SPIR CIZ. Note that the incident was found non-complaint during the previous audit period with the below outlining the outcomes of the regulator investigations.</p> <p>On 6 October 2021, under the N2NS SP1 CSSI MCoA DPIE advised that the event was a breach of MCoA E65. The Department determined to record the breach without any further action at this time. The action was not reported externally, however this may be taken into account if a breach of a similar nature occurs in the future. DPIE Compliance then referred the event to the Department's Biodiversity and Conservation Division (BCD) under the NPW Act.</p>	Compliant	Continue to implement the key corrective actions from the incident investigation. Continue to protect scare and survey trees and where possible relocated CIZ or access points to avoid tree drip zones or APZs.

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>On 14 March 2022, the Biodiversity and Conservation Division commented that, “While our preliminary inquiries into the matter suggest that a possible breach of the NPW Act has occurred, the Department has decided not to continue its investigation or take any further action in response to this particular matter.</p> <p>A number of key corrective actions are currently being implemented to mitigate the potential for future incidents.</p>		
E66	The Proponent must not harm, modify, or otherwise impact human remains uncovered during the construction of the CSSI.	Not triggered at the time of the audit. This requirement is noted in the Construction Heritage Management Sub Plan in section 5.8.7.	Not triggered	
E67	Identified impacts to heritage items must be minimised through both design and construction. The measures for ensuring this are to be detailed in the Construction Heritage Management Sub-Plan required by Condition 0.	This requirement is noted in the Construction Heritage Management Sub Plan in sections 5.8 and 5.9.	Compliant	
E68	<p>Non-Aboriginal Heritage</p> <p>The Proponent must undertake Heritage Photographic Archival Recordings (of heritage items and potential heritage items associated with the existing rail line (including culverts/underbridges with timber components and former rail station sites) which have been identified for demolition in the EIS and Submissions Report.</p>	<p>This requirement is noted in section 5.9.2 of the Construction Heritage Management Sub Plan.</p> <p>The report <i>Photographic Archival Recording and Research Report Narrabri to North Star SP1 Narrabri, Moree and North Star regions Photographic Archival Recording and Research</i> prepared by Niche Environment and Heritage dated 13 April 2021 contains the photographic records for these components.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E68	The photographic recording of items with a statutory listing must be undertaken in accordance with NSW Heritage Division guidelines. The photographic recording of items with potential heritage significance but no statutory listing may be undertaken in accordance with ARTC's Archival Recording Standard.	<p>This requirement is noted in section 5.9.2 of the Construction Heritage Management Sub Plan.</p> <p>The report Photographic Archival Recording and Research Report Narrabri to North Star SP1 Narrabri, Moree and North Star regions Photographic Archival Recording and Research prepared by Niche Environment and Heritage dated 13 April 2021 contains the photographic records for these components.</p>	Compliant	
E69	The design of any proposed works or alterations to TfNSW assets, including but not limited to railway stations at Edgeroi, Bellata, Gurley and Moree must be developed in consultation with and endorsed by TfNSW prior to the commencement of works affecting these assets.	Designs for Moree Station Upgrade and the removal of Edgeroi and Gurley platforms were subject to consultation with TfNSW.	Compliant	
E70	<p>Aboriginal Heritage</p> <p>Prior to the commencement of investigation activities within the expanded construction footprint identified in the SPIR, the Proponent must prepare a methodology for archaeological investigation in consultation with DPC Heritage and Registered Aboriginal Parties (RAPs).</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.	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
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> <ul style="list-style-type: none"> a. Undertake archaeological investigations; and b. report on the results of the archaeological investigation, including, but not necessarily be limited to: <ul style="list-style-type: none"> 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; ii. where impacts cannot be avoided, recommendations for any further investigations or salvage; iii. management and mitigation measures to ensure there are no additional impacts due to preconstruction and construction activities; and <p>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 SP1) prepared by Niche Environment and Heritage dated 18 December 2020 and Addendum Aboriginal Cultural Heritage Assessment Narrabri to North Star – Separable Portion 1 (N2NS SP1) prepared by Niche Environment and Heritage dated 1 December 2020 were submitted on 11 January 2021 detailing this methodology and consultation.</p>	Compliant	
E72	<p>The methodology required by Condition E70 and the report required by Condition E71 must be provided to the Planning Secretary for information and its results incorporated into the Construction Heritage Management Sub Plan required by Condition 0.</p>	<p>This requirement is included in Section 1 of the Construction Heritage Management Sub Plan.</p> <p>Construction Heritage Management Sub-Plan 5-0018-260-PES-00-PL-0008 Revision: 1 Issued: 08/06/2021 Approved by Jake Shackleton as nominee of the Planning Secretary on 17/06/2021. DPIE letter received 7/04/2021 confirming approval of documents and required consultation and endorsement by the ER and relevant government agencies. Evidence of Consultation and responses are outlined in Appendix A of the CHMSP.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
LAND USE AND PROPERTY				
E73	Dilapidation Surveys and Rectification The Proponent must undertake dilapidation surveys on the current condition of surface and sub-surface structures owned by third parties and identified at risk from vibration. The dilapidation surveys must be prepared by a suitably qualified and experienced person(s).	ARTC indicated that there have been no dilapidation surveys required during the audit period.	Not triggered	
E74	The results of the dilapidation surveys must be provided to the relevant owners of surface and sub-surface structures for review prior to the commencement of potentially impacting works.	ARTC indicated that there have been no dilapidation surveys required during the audit period.	Not triggered	
E75	Subsequent dilapidation surveys must be undertaken to assess damage to the surface and sub-surface structures that may have resulted from the construction of the CSSI within three months of the completion of construction, unless otherwise agreed by the Secretary.	ARTC indicated that there have been no subsequent dilapidation surveys required during the audit period.	Not triggered	
E76	The results of the subsequent dilapidation surveys for each surface and sub-surface structure surveyed must be provided to the relevant owners of the structures within one (1) month of undertaking the surveys.	ARTC indicated that there have been no subsequent dilapidation surveys required during the audit period.	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E77	The Proponent must carry out rectification at its expense and to the reasonable requirements of the surface and sub-surface structure owner(s) within three (3) months of completion of the post-dilapidation surveys unless otherwise agreed with the owner of the affected surface and sub-surface structure.	Not triggered during the audit period.	Not triggered	
E78	Rehabilitation Any agreements for the temporary use of land for construction purposes must provide for the rehabilitation of that land and any structures on it to its pre-construction state, unless otherwise agreed with the landowner.	Not triggered during the audit period.	Not triggered	
SUSTAINABILITY				
E79	The CSSI must achieve a minimum 'excellent' rating for both 'Design' and 'As built', under the Infrastructure Sustainability Council of Australia infrastructure rating tool [version 1.2 or 2.0], or through the use of an equivalent process or an equivalent level of performance using a demonstrated equivalent rating tool.	Inland Rail – N2NS (Phase 1) has been certified by the Infrastructure Sustainability Council of Australia (ISCA) for an Excellent IS Design rating dated November 2020.	Compliant	
SOILS				
E80	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.	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-SP1). Several temporary soil stockpiles were observed to not be managed in accordance	Non-compliant	Ensure all reasonably practicable erosion and sediment controls must be installed and appropriately maintained to minimise any water pollution. Ensure regular cleaning of drainage structures and erosion and sediment

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
		<p>with the site-specific Erosion and Sediment Control Plan during the site inspection.</p> <p>The design and construction of drainage crossings and piling pads, particularly those inspected during the previous audit have improved but has still resulted in some minor erosion and sedimentation of creek lines and drainage over recent rain events.</p> <p>Evidence of partially blocked pipes noted in some crossings.</p> <p>Batters along the rail corridor works, observed appeared to be generally maintained and were an improvement from the previous audit site inspection.</p> <p>Material tracking was noted onto the Newell Highway from works sites. It was noted that a dedicated street sweeper is utilised to remove tracked material. However, due to the length of the project there is significant distance for the street sweeper to cover.</p> <p>Unlined and uncontained concrete spills noted within the piling pad at Bobbiwaa Bridge.</p>		<p>control structures is undertaken prior to and following significant rain events.</p> <p>Ensure temporary stockpiles are adequately stabilised, located, and managed in accordance with the ESCP.</p> <p>Ensure temporary batters are appropriately stabilised to reduce the risk of erosion until the final design shaping and rehabilitation is implemented.</p> <p>Consider further mitigation measures, such as rumble grids, to reduce material tracking onto the Newell Highway.</p> <p>Ensure appropriate concrete washout pits are installed as required and all excess concrete spills are removed immediately following the spill event during piling works.</p>
E81	<p>Contaminated sites</p> <p>In the event that soils suspected to be contaminated are unexpectedly found, the Proponent must engage a suitably experienced and qualified contaminated land consultant to undertake further investigations to determine the type and extent of any contamination. The investigation must be undertaken in accordance with guidelines made or approved under the Contaminated Land Management Act 1997 (NSW). The results of the investigation must be documented in a Site Contamination Assessment Report.</p>	<p>An Unexpected Discovery of Contaminated Land Procedure is located in Appendix C of the Construction Soil and Water Management Sub-Plan (2600-0018 N2NS-SP1). There were no unexpected contamination finds recorded during the audit period.</p>	Not triggered	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E82	Where the results of site investigations required by Condition E81 indicate that the contamination poses unacceptable risks to human health or the environment under either the present or proposed land use, the Proponent must engage a suitably experienced and qualified contaminated land consultant to develop and implement any necessary remediation measures. The remediation measures must be documented in a Remediation Report	Contamination associated with the E81 incident did not poses unacceptable risks to human health or the environment under either the present or proposed land use.	Not triggered	
E83	If remediation is required under Condition E82, a Site Audit Statement and Site Audit Report must be prepared by a NSW EPA Accredited Site Auditor. Contaminated land must not be used for the purpose approved under the terms of this approval until a Site Audit Statement determines the land is suitable for that purpose and any conditions on the Site Audit Statement have been complied with.	No remediation works occurred during the audit period under E82.	Not triggered	
E84	Nothing in Conditions E81 to E83 prevents the Proponent from preparing a single Site Contamination Report or Remediation Report or obtaining a single Site Audit Statement and Site Audit Report for the entire CSSI.	Noted and acknowledged by ARTC.	Not triggered	
E85	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.	An Unexpected Discovery of Contaminated Land Procedure is located in Appendix C of the Construction Soil and Water Management Sub-Plan (2600-0018 N2NS-SP1).	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
AIR QUALITY				
E86	In addition to the performance outcomes, commitments and mitigation measures specified in the documents listed in Condition A1, all practicable measures must be implemented to minimise the emission of dust and other air pollutants during the construction and operation of the CSSI.	The Construction Soil and Water Management Sub-Plan (2600-0018 N2NS-SP1) outlines the Air Quality Monitoring Program in Appendix D and associated mitigation measures in Section 7.1. Dust mitigation measures were observed during the site inspection in the form of water carts and various ground/stockpile coverings. It is noted that significant rain events had occurred prior to the site inspection occurring.	Compliant	
WASTE				
E87	Waste generated during construction and operation is to be dealt with in accordance with the following priorities: <ul style="list-style-type: none"> a. waste generation is to be avoided and where avoidance is not reasonably practicable, waste generation is to be reduced; b. where avoiding or reducing waste is not possible, waste is to be re-used, recycled, or recovered in accordance with the requirements of the Protection of the Environment Operations Act 1997 and its regulations; and c. where re-using, recycling or recovering waste is not possible, waste is to be treated or disposed of at a waste management facility or premise lawfully permitted to accept the materials 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. 	Waste and Resource ECM has been developed to manage the waste and resource recovery related risks on this Project. General housekeeping and waste segregation and storage was observed to be poor at the Yallaroi Laydown area with several temporary stockpiles contaminated with foreign materials and rubbish not segregated and contained within formalised waste bins. Evidence supplied of waste and recycling reports issued to ARTC monthly by Cleanaway during the audit period. The report outlines volumes and waste streams recorded during each month. The monthly reports outline landfill and diversion percentages along with month on month comparisons.	Compliant	Ensure waste segregation is followed on site to limit cross contamination of bins and stockpiles. Ensure regular inspections are undertaken following completion of milestones on all areas of the project. Waste tracking information should be provided by third party suppliers on a regular basis to the project team to ensure compliance with this condition.

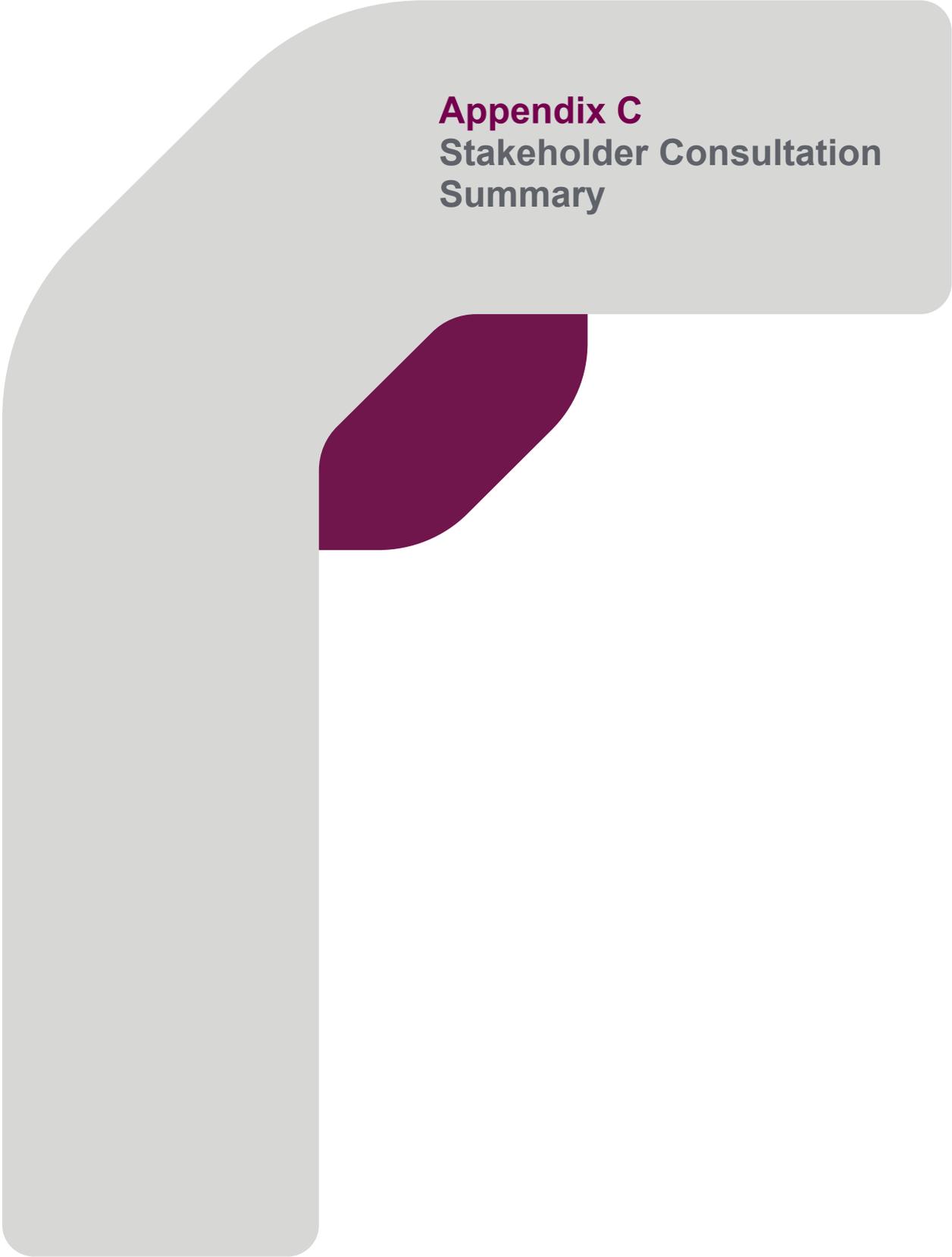
Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E88	<p>The importation of waste and the storage, treatment, process, reprocessing or disposal of such waste must comply with the conditions of the current EPL for the CSSI, or be done in accordance with a Resource Recovery Exemption or Order issued under the Protection of the Environment Operations (Waste) Regulation 2014, as the case may be.</p>	<p>Waste and Resource ECM has been developed to manage the waste and resource recovery related risks on this Project.</p> <p>No waste has been imported to the site during the audit period.</p>	Compliant	
E89	<p>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.</p> <p><i>Note: Notice must be given to the relevant site/s as soon as possible, and no more than 14 days before the proposed waste disposal.</i></p>	<p>Waste and Resource ECM has been developed to manage the waste and resource recovery related risks on this Project.</p> <p>Solid waste is collected and exported from site by Cleanaway to Moree Waste Management Facility EPL12788.</p> <p>Evidence supplied of waste and recycling reports issued to ARTC monthly by Cleanaway during the audit period. The report outlines volumes and waste streams recorded during each month.</p>	Compliant	

Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
E90	All waste generated during construction and operation must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	<p>Waste and Resource ECM has been developed to manage the waste and resource recovery related risks on this Project.</p> <p>Solid waste is collected and exported from site by Cleanaway to Moree Waste Management Facility EPL12788. Waste streams exported from site during the audit period were pre-classified under the EPA's Waste Classification Guidelines</p> <p>Evidence supplied of waste and recycling reports issued to ARTC monthly by Cleanaway during the audit period. The report outlines volumes and waste streams recorded during each month.</p>	Compliant	

Appendix B – WRITTEN INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS

IEA Ref No.	Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
IN1	1	A written incident notification addressing the requirements set out below must be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under Condition A41 or, having given such notification, subsequently forms the view that an incident has not occurred.	Written incident notifications observed to be compliant with the timing and format outlined in the condition.	Compliant	
IN2	2	Written notification of an incident must: <ul style="list-style-type: none"> a. identify the SSI and application number; b. provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); c. identify how the incident was detected; d. identify when the Proponent became aware of the incident; e. identify any actual or potential non-compliance with conditions of approval; f. describe what immediate steps were taken in relation to the incident; g. identify further action that will be taken in relation to the incident; and h. identify a project contact for further communication regarding the incident. 	Written incident notifications submitted during the audit period were observed to contain the information required in the condition.	Compliant	
IN3	3	Within 30 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	Detailed reports observed for incidents occurring during the audit period, outlining the requirements listed in Appendix B Condition 4 were observed to be submitted within 30 days to DPE.	Compliant	

IEA Ref No.	Cond No.	Requirements	IEA Comments & Evidence	Compliance Status	Recommendations
IN14	4	The Incident Report must include: <ul style="list-style-type: none"> a. a summary of the incident; b. outcomes of an incident investigation, including identification of the cause of the incident; c. details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and d. details of any communication with other stakeholders regarding the incident. 	Incident reports observed were noted to include the details listed in this condition.	Compliant	



Appendix C Stakeholder Consultation Summary

REGULATOR CONSULTATION CHECKLIST – INLAND RAIL – N2NS AUDIT 3

REGULATOR CONSULTATION CHECKLIST – INLAND RAIL – N2NS AUDIT 3.....	1
Narrabri Shire Council	2
Biodiversity, Conservation and Science Directorate	3

IEA No.	Stakeholder Comment	Comments & Evidence	Recommendations
Narrabri Shire Council			
SC01	<p>Please be advised that the following general feedback is provided in this regard:</p> <p>The existence of ongoing communication challenges with Inland Rail and its appointed sub-contractors particularly in response to timely and accurate technical information.</p>	<p>Review of provided information indicates that ARTC and Trans4m are actively communicating with NSC.</p> <p>Face-to-face monthly meeting held with Narrabri Shire Council representatives, Inland Rail and the N2NS Contractor Trans4m Rail. Location: Narrabri Shire Council Chamber, Narrabri. Meeting set up in Teams to allow external staff to dial in.</p> <p>Review of August 2022 council briefing Meeting Agenda included:</p> <ul style="list-style-type: none"> • Introductions • Project Update • Environmental Update • MIRDA Agreement update • Action items Meeting minutes are in the form of the attached action list and monthly project update presentation. 	
SC02	<p>Please be advised that the following general feedback is provided in this regard:</p> <p>Pending approvals pursuant to Section 68 of the Local Government Act 1993 for the Bellata Water Main works; and</p>	<p>Communication was undertaken with NSC, resulting in the works being undertaken on 25th August. External communication is listed below:</p> <ul style="list-style-type: none"> • Community notification issued by NSC and IR to community early August • Supported by social media posts and community drop-in session and an ad in the local paper • Individual conversations were had with key stakeholders – BP (bathroom facilities were provided for the duration of the outage) and GrainCorp. 	
SC03	<p>Please be advised that the following general feedback is provided in this regard:</p>	<p>TMP for Stage 1 was sent to NSC 28/03/2022. To the best of ARTC's knowledge, no issues</p>	

IEA No.	Stakeholder Comment	Comments & Evidence	Recommendations
	An outstanding approval pursuant to section 138 of the Roads Act 1993 for proposed activities within Council's Road Reserve(s). A targeted review of the available Transport Management Plans and allied environmental sub-plans is therefore considered pertinent.	pertaining to S138's. RPS was informed that the S138 was sent to Council for approval.	
Biodiversity, Conservation and Science Directorate			
SC04	Condition E32 requires ARTC to prepare Flood Review Reports for the first 15 years of operation, subject to the details of the condition. BCS is interested to understand whether any of the recent flood events (that is, since the March 2021 floods) have triggered this condition or not, and if so, what progress has been made on the preparation of the reports.	The project has not become operational as defined by DPE and the CSSI during the audit period. The project is anticipated to become operational during the next audit period.	
SC05	An updated version of the Construction Biodiversity Management Sub-Plan was approved by DPE (formerly DPIE) on 10 January 2022. The approval letter (contained in the BMP) states that the BMP will need to be reviewed prior to Stage 1 works commencing in order to include updates relevant to that section of the project. It is our understanding that works commenced in early April 2022 and an updated BMP has not yet been provided for review and approval as of 10 May 2022. Review and commentary on this matter would be appreciated.	<p>DPE approval letter for the Revision 3 BMP dated 10 January 2022 indicated that the BMP will need to be reviewed again prior to Stage 1 works commencing in order to include any relevant updates for that section of the project. RPS also understands that Stage 1 works commenced in early April 2022 prior to revision of the BMP.</p> <p>A Species Management Plan (SMP) has been prepared for inclusion as an Appendix in the BMP. The SMP was reviewed by Renee Shephard from BCS on 10 June 2022, within DPE and comments included by the SMP author Ben Lewis (Lewis Ecological) where appropriate.</p> <p>Revision 4 of the BMP has not been approved during the audit period. RPS sighted the revised Species Management Plan Rev 1 dated 12 August 2022 in response to BCS and ER comments.</p> <p>ARTC sent a memo and request to BCS on 21 February 2022 confirming that the memo would be prepared outlining the proposed works and measures to be implemented to mitigate potential impacts to the FCWS in the interim. BCS replied on 22 March 2022 outlining that BCS did not object to early works</p>	Ensure the BMP is updated and includes the SMP.

IEA No.	Stakeholder Comment	Comments & Evidence	Recommendations
		<p>commencing in the Stage 1 component of the project in the absence of an updated Biodiversity Management Plan (BMP) and Species Management Plan. BCS did expect that relevant components of the approved BMP would continue to be implemented in the interim period.</p>	
SC06	<p>Condition E17 requires ARTC to minimise impacts to PCTs and to not exceed areas identified in Table 1. The audit report dated xxx indicated that the cumulative clearing amount was well below the approved area, as expected so early in the construction period. The next audit should ensure that none of the clearing limits for individual PCTs have been exceeded. Also of interest, is whether all of the clearing has remained within the approved Construction Impact Zone boundary, and whether any spatial information is available to support this.</p>	<p>Table 1.4 and Table 1.5 of the June 2022 addendum to the Inland Rail – Narrabri to North Star Biodiversity Assessment Report, Rev 8, 27 June 2022 provides a summary of the impacts on vegetation communities and species credits species between the approved SPIR CIZ and the current IFC CIZ.</p> <p>The tables demonstrate that the impacts to plant community types have been minimised and do not exceed the total areas impacted as identified in Table E1:</p> <ul style="list-style-type: none"> • Overall 44 percent reduction in the ecosystem credits • Overall 62 percent reduction in species credits <p>During the site inspection, clearing appeared to have remained within the CIZ.</p>	



Appendix D Response to Previous Audit

RESPONSE TO PREVIOUS AUDIT CHECKLIST – INLAND RAIL – N2NS AUDIT 3

RESPONSE TO PREVIOUS AUDIT CHECKLIST – INLAND RAIL – N2NS AUDIT 3	1
Identified Non-Compliance Findings	2
Identified Non-Compliance Findings	7

Condition Ref.	Requirement	IEA Finding	Recommendations	Status
Identified Non-Compliance Findings				
A1	<p>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>	<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> <p>A2 – CSSI Compliance E13 – Noise Mitigation – Operational Noise Mitigation Measures E65 – Aboriginal Heritage Artefact Recovery E80 – Erosion and sediment controls E90 – Waste Classification</p> <p>Refer to the specific IEA comments and evidence for each noncompliant condition listed above.</p>	<p>No recommendation required for non-compliance. Refer to the specific IEA comments, evidence, and recommendations for each non-compliant condition.</p>	<p>Responses to specific MCoA are outlined below.</p>
A2	<p>The CSSI must be carried out in accordance with all procedures, commitments, preventative</p>	<p>Noted, as above.</p>	<p>As above.</p>	<p>As above.</p>

Condition Ref.	Requirement	IEA Finding	Recommendations	Status
	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.			
E13	<p>Noise Mitigation – Operational Noise Mitigation Measures</p> <p>The Proponent must prepare an Operational Noise and Vibration Review (ONVR) to confirm noise and vibration control measures that would be implemented for the operation of the CSSI. The ONVR and identification / selection of any noise mitigation measures must be prepared in consultation with the EPA and impacted sensitive receivers. Where barrier options (e.g. noise walls or mounds) are proposed to be implemented, consultation must also be undertaken with the relevant councils. The ONVR must:</p> <p>(a) confirm the appropriate operational noise and vibration objectives and levels for adjoining development, including existing sensitive receivers;</p> <p>(b) confirm the operational noise and vibration predictions based on the final design. Confirmation must be based on an appropriately calibrated noise model (which has incorporated additional noise monitoring, and concurrent traffic counting, where necessary for calibration purposes).</p> <p>(c) Identify / confirm sensitive receivers at which the criteria set out in the Rail Infrastructure Noise Guideline (EPA, 2013) are predicted to be exceeded once the CSSI is operational and in 2040;</p> <p>(d) review the suitability of the operational noise mitigation measures identified in the documents listed in Condition A1 and, where necessary, investigate and identify additional noise and</p>	<p>At the time of the audit, the Operational Noise and Vibration Review (ONVR) had not been finalised. With construction commencing on site 10 April 2021, the due date for submission of the ONVR was 10 July 2021. ARTC submitted the ONVR to DPIE on 13 August 2021. Consultation is currently being undertaken. Design of any noise walls and at-property treatments is to be finalised, pending outcomes of community consultation. The final ONVR to be lodged in March 2022.</p>	<p>Ensure that the final Operational Noise and Vibration Review (ONVR) with consultation is submitted to the secretary for approval by the due date in March 2022.</p>	<p>ARTC submitted a draft of the ONVR on the 13/08/2021.</p> <p>ONVR Phase 1 3-0001-260-EEC-00-RP-000 Revision: H Issued: 18 March 2022 Approved by Dominic Crinnion as nominee of the Planning Secretary on 09/05/2022.</p>

Condition Ref.	Requirement	IEA Finding	Recommendations	Status
	<p>vibration mitigation measures required to achieve the noise criteria outlined in the Rail Infrastructure Noise Guideline once the CSSI is operational and in 2040. This review must consider local climate and impacts on existing cooling devices, and alternative at- property mitigation measures where the physical condition of a receiver building would render acoustic glazing and seals ineffective;</p> <p>(e) describe the final suite of noise and vibration mitigation measures that will be implemented to achieve the noise criteria outlined in the Rail Infrastructure Noise Guideline once the CSSI is operational and in 2040, including the timing of implementation in accordance with Condition E14;</p> <p>(f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures; and</p> <p>(g) procedures for the management of operational noise and vibration complaints.</p> <p>The ONVR is to be verified by a suitably qualified and experienced noise and vibration expert. The ONVR is to be undertaken at the Proponent's expense and submitted to the Secretary for approval within three (3) months of construction commencing.</p>			
E65	<p>The Proponent must not destroy, modify or otherwise physically affect any heritage items, including Aboriginal objects, outside of the CSSI construction boundary.</p>	<p>The CIZ was generally delineated with the use of barrier tape and signage. Site inspections of construction areas identified that no disturbance had occurred outside the delineated construction areas during construction works.</p> <p>Incident EVT-0000168 - CH740.500 & CH740.200_South of Yallori Creek_ARTC's Heritage Consultant potentially salvaged items outside the SPIR CIZ. Niche</p>	<p>Review and implement findings from incident investigation.</p>	<p>Salvage of remaining artefacts has been completed and are being securely held.</p> <p>Findings from the investigation have been implemented.</p> <p>DPIE has closed out this incident.</p> <p>DPIE Compliance then referred the event to the Department's Biodiversity and Conservation</p>

Condition Ref.	Requirement	IEA Finding	Recommendations	Status
		<p>Environment and Heritage advised ARTC on the 19 August 2021 that they completed their mapping from recent artefact surface collection, and it indicated that artefact collection of approximately 70 artefacts occurred outside of the SPIR boundary. DPIE and the ER was verbally advised of the incident on the same day, with Heritage NSW advised on 20 August 2021. A seven-day notification was submitted to DPIE and the ER.</p> <p>The investigation in relation to the non-compliance of this condition has been closed by DPIE.</p> <p>As the incident involved the salvage of aboriginal stone artefacts outside of the approved construction boundary of SSI 7474 it is currently being investigated by the Department's Biodiversity and Conservation Division (BCD) under the National Parks and Wildlife Act 1974.</p>		<p>Division (BCD) under the NPW Act.</p> <p>On 14 March 2022, the Biodiversity and Conservation Division commented that, "While our preliminary inquiries into the matter suggest that a possible breach of the NPW Act has occurred, the Department has decided not to continue its investigation or take any further action in response to this particular matter.</p> <p>A number of key corrective actions are currently being implemented to mitigate the potential for future incidents.</p> <p>ARTC will continue to engage and consult with the project's Registered Aboriginal Parties.</p>
E80	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>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- SP1).</p> <p>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 has improved but has still resulted in erosion of the pads and sedimentation of creek lines and drainage over recent rain events.</p>	<p>Ensure all reasonably practicable erosion and sediment controls must be installed and appropriately maintained to minimise any water pollution. Ensure sediment fencing is installed to the correct depths as per the Blue Book (Crooble Laydown). Ensure regular maintenance is undertaken to sediment controls to remove build up.</p> <p>This should be driven by site supervisors' daily inspections and rectified as issues arise. Sediment issues were particularly noted at Yallaroi Creek piling pad pipes.</p>	<p>It is noted that recent rain events in the New England Region have been above average during the audit period.</p> <p>ARTC conducting a review of erosion and sediment control practices on the project with an independent qualified Certified Professional in Erosion and Sediment Control (CPESC) to ensure continual improvement across the alignment.</p>

Condition Ref.	Requirement	IEA Finding	Recommendations	Status
		<p>Batters along the rail corridor works, observed appeared to be generally maintained and was an improvement from the previous audit site inspection.</p>	<p>It is recommended that the hydraulic model is continued to be reviewed considering the observations and data obtained during recent rain events.</p> <p>It is recommended that the lessons learnt during construction and operation of the Stage 1 piling pads be implemented during the next stage of works consider the impact that saturated catchments have on the volumes of water within creek and drainage lines.</p> <p>Consideration also be given to the installation of larger piling pads and crossings with larger volume pipework, longer shallow downstream faces with larger rock and consideration of gabion baskets where required.</p> <p>It is further recommended that continued review of the design 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>	
E90	<p>All waste generated during construction and operation must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal docketts retained for audit purposes.</p>	<p>Waste and Resource ECM has been developed to manage the waste and resource recovery related risks on this Project.</p> <p>On Tuesday, the 19th October 2021 at 6:05pm, Trans4m Rail reported an environmental event to ARTC via Aconex (TRANS4M-GCOR-000986), with further information provided on Wednesday, the</p>	<p>Ensure waste classification is undertaken for all material exported from site in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (NSW EPA, November 2014).</p>	<p>ARTC's Construction Contractor Trans4m Rail classified the material as 'contaminated soil' and confirmed with the MSCP Landfill that they could accept this material. The event is not considered to have caused actual or potential environmental harm that is not</p>

Condition Ref.	Requirement	IEA Finding	Recommendations	Status
		<p>3rd November 2021 at 11:08am (TRANS4M-RFID-000303). This event related to a release of approx. 150L of diesel from the tamper machine at CH651.560 impacting the embankment material below and some material adjacent the embankment. This impacted material was excavated immediately following the event on the 19th October and temporarily stockpiled in a lined, bunded area.</p> <p>On the 27th and 28th of October 2021, this impacted material (approx. 24.1t) was transported and disposed of at the Moree Plains Shire Council (MPSC) Landfill Facility as "Contaminated Soil".</p> <p>As a result of the further investigations into the event it was later identified that the hydrocarbon impacted material from this event was not classified strictly in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (NSW EPA, November 2014) prior to disposal.</p>	Ensure Contractors are appropriately qualified and trained to assess and manage waste.	<p>trivial in nature for the following reasons:</p> <ul style="list-style-type: none"> - The impacted material was transported and disposed of to a landfill licensed to accept material of this nature. The final disposal location being the Moree Cell. - The rectification costs (listed below) will not exceed \$10,000. - The in-situ material onsite was treated with RemActiv Bioremediation concentrate to assist the breakdown in hydrocarbons. <p>Trans4M Rail have conducted training with their Project Personnel regarding waste management and disposal including the requirements of the NSW EPA Waste Classification Guidelines.</p>

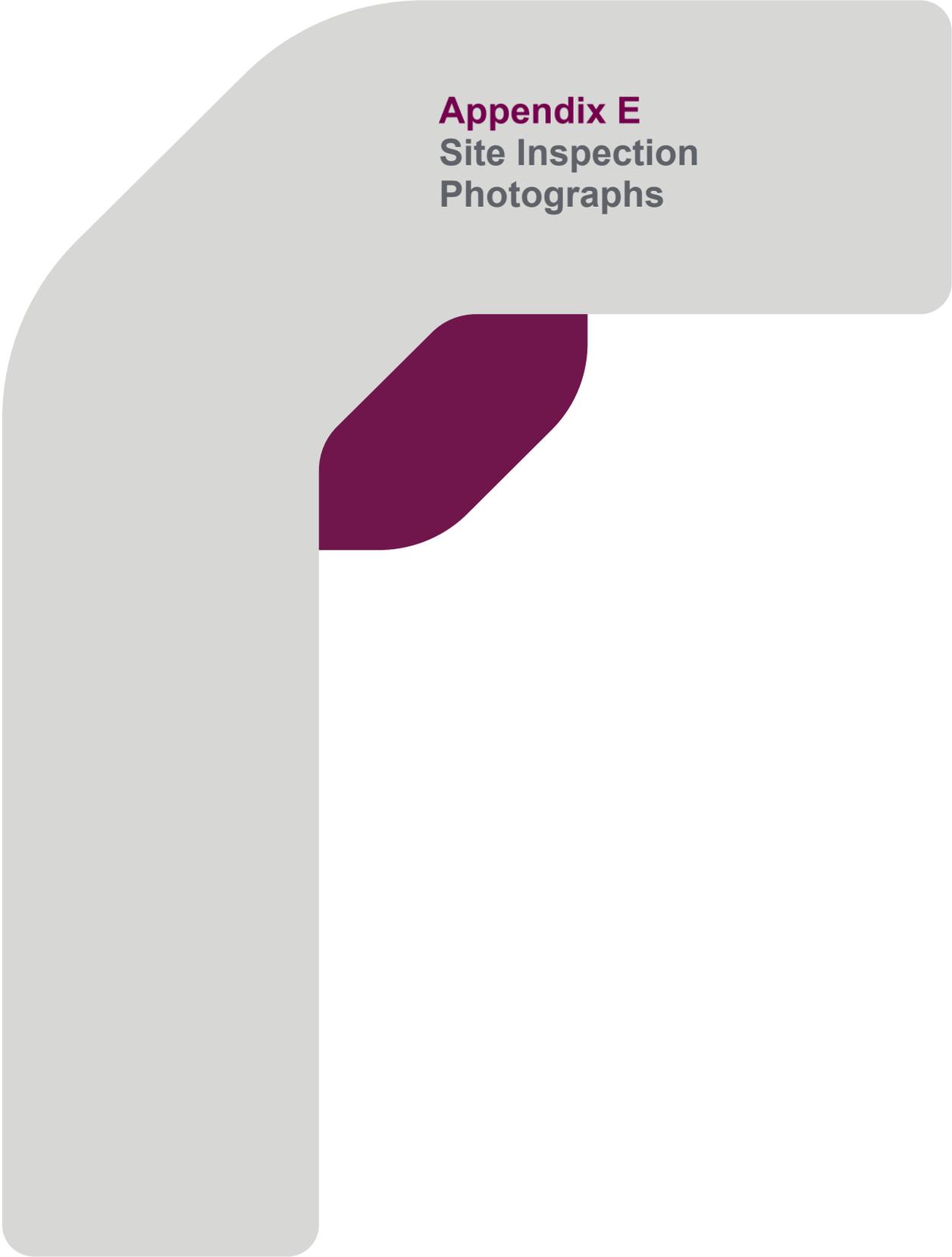
OFI Reference	Condition Reference	IEA Finding	Recommendations	Status
Identified Opportunities for Improvement				
OFI01	A4, C4	<p>It was noted during the audit that Revision 0 CEMP and sub plan versions were being utilised by site for the FEMP, CEMP, NVMP, and TTAMP. It was noted that the approved revisions approved on 7/4/21 are the same as the Revision 0 version with ARTC updating the documents to revision 0 following approval from DPIE. DPIE letter received 24/11/21 confirming approval of the:</p> <ul style="list-style-type: none"> - Construction Soil and Water Management sub Plan Revision 1, dated 26/10/2021 	Ensure only CEMP sub plan revisions approved by DPIE are utilised and distributed to the project team.	CEMP sub plan revisions approved by DPIE have been distributed to the project team and appear on the project website.

OFI Reference	Condition Reference	IEA Finding	Recommendations	Status
		DPIE letter received 10/01/22 confirming approval of the: – Construction Biodiversity Management sub Plan Revision 3, dated 06 January 2022		
OFI02	A6	Any document that must be submitted, or approval that must be obtained, within a timeframe specified in or under the conditions of this approval may be submitted within a later timeframe agreed with the Planning Secretary.	Recommended that approval letters for all management plans and reports be attached as appendix items to demonstrate compliance status.	The approval letters were observed to have been appended to the Management Plans / Sub- Plans as part of the applicable revisions during the audit period.
OFI03	B11	Inconsistencies noted between versions of management plans uploaded to the ARTC website and the versions currently being utilised by site.	Updated project website with correct management plans being utilised by the project.	Project website was reviewed to ensure correct management plans are available.
OFI04	C5-C6	Condition wording.	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 DPIE to confirm this reference and the approval modified accordingly.	ARTC indicated that they will request the change with the correct reference in a modification of 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.
OFI05	E13	At the time of the audit, the Operational Noise and Vibration Review (ONVR) has not been finalised. With construction commencing on site 10 April 2021, the due date for submission of the ONVR was 10 July 2021. ARTC submitted the ONVR to DPIE on 13 August 2021. Consultation is currently being undertaken. Design of noise walls and at-property treatments is to be finalised, pending outcomes of community consultation. The final ONVR to be lodged in March 2022.	Ensure that the final Operational Noise and Vibration Review (ONVR) with consultation is submitted to the secretary for approval by the due date in March 2022.	ONVR Phase 1 3-0001-260-EEC-00-RP-000 Revision: H Issued: 18 March 2022 Approved by Dominic Crinnion as nominee of the Planning Secretary on 09/05/2022.
OFI06		Compliance with the Quantitative Design Limits is outlined in Section 5.3.2 of the Flood Design Verification Report for Phase 1 Issued For Construction, dated 04/02/2022 (Rev E, Doc No. 3-0001- 260-IHY-00-RP-0006). Consultation on drainage and flooding issues has been undertaken in two stages:	Ensure agreements are obtained for all outstanding mitigation measures for Stage 2	Stage 2: undertaken after the CoA and associated QDLs were received in May 2021 with the majority of the consultation being completed by July 2021. See Table 6.2 and 6.4 for non-compliance, mitigation (if required) and if accepted by landowner. For ongoing consultation see Section 6.4.6.

OFI Reference	Condition Reference	IEA Finding	Recommendations	Status
		<p>Stage 1: Undertaken during the Reference design stage, 50%, 70% and 100% in Phase 1.- Consultation began in November 2019 and ended in January 2020.</p> <p>Stage 2: undertaken after the CoA and associated QDLs were received in 2021 – Consultation began in May 2021 and was completed in July 2021. See Agreed mitigation measures for affected land or property owners is outlined in Tables 6.4, 6.5, and 6.6 of the FDVR.</p> <p>A number of outstanding mitigation measures pending agreement after Stage 2 are outlined in Table 6.7 of the FDVR.</p>		All agreements for mitigation measures pending agreement after Stage 2 outlined in Table 6.7 of the FDVR have now been acquired.
OFI07	E28	Flood Design Verification Report	Attach the Department approval letter of the FDVR in Appendix.	The report is currently at the Issued For Construction (IFC) design stage draft status, and has been reviewed by ARTC, the TA and the Independent Peer Reviewer.
OFI08		ARTC appointed BMT as an External Independent Peer Reviewer of the FDVR. The Independent Peer Review is contained in Appendix I of the FDVR. The Independent Peer Review concluded that the investigations to date have presented clear guidance for the detailed design requirements and landowner consultation to enable the final design for construction to achieve an acceptable outcome for all parties.	Ensure the document providing the results of the sensitivity tests and a full response to the review comments and the final Peer Review Report is provided in Appendix I of further revisions of the FDVR.	ARTC will action post final peer review.
OFI09	E65 SCS8-	Fencing and flagging of the project boundaries, particularly environmental protection and no-go zones.	More adequate delineation is suggested with the use of flagging or equivalent measure to clearly delineate the SPIR CIZ and environmental no-go zones particularly in active work or high-risk areas.	Observed ARTC and Trans4m have generally actioned to ensure delineation is adequate in active work or high-risk areas.
OFI10	E65	Incident EVT-0000168 - CH740.500 & CH740.200_South of Yallori Creek_ARTC's Heritage Consultant potentially salvaged items outside the SPIR CIZ Niche Environment and Heritage advised ARTC on the 19 August 2021 that they completed their mapping from recent artefact surface collection, and it indicated that artefact collection of approximately 58 artefacts occurred outside of	Review and implement outcomes from incident investigation.	See above overview in E65 Response

OFI Reference	Condition Reference	IEA Finding	Recommendations	Status
		the SPIR boundary. DPIE and the ER was verbally advised of the incident on the same day, with Heritage NSW advised on 20 August 2021. A seven-day notification was submitted to DPIE and the ER. The investigation in relation to the non-compliance of this condition has been closed by DPE. As the incident involved the salvage of aboriginal stone artefacts outside of the approved construction boundary of SSI 7474 it is currently being investigated by the Department's Biodiversity and Conservation Division (BCD) under the National Parks and Wildlife Act 1974.		
OFI11	E80	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-SP1). Sediment fencing and use of geofabric coverings over some 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. The design and construction of drainage crossings and piling pads, particularly those inspected during the audit at has improved but has still resulted in erosion and sedimentation of creek lines and drainage over recent rain events. Batters along the rail corridor works, observed appeared to be generally maintained and was an improvement from the previous audit site inspection.	Ensure all reasonably practicable erosion and sediment controls must be installed and appropriately maintained to minimise any water pollution. Ensure sediment fencing is installed to the correct depths as per the Blue Book (Crooble Laydown). Ensure regular maintenance is undertaken to sediment controls to remove build up. This should be driven by site supervisors' daily inspections and rectified as issues arise. Sediment issues were particularly noted at Yallaroi Creek piling pad pipes. It is recommended that the hydraulic model is continued to be reviewed considering the observations and data obtained during recent rain events. It is recommended that the lessons learnt during construction and operation of the Stage 1 piling pads be implemented during the next stage of works consider the impact that saturated catchments have on the volumes of water within creek and drainage lines.	See above overview in E80.
OFI12	E86	Air Quality – dust management during construction	Ensure plant and / or truck haulage operators adjust routes and movements in response to site conditions where dust generating potential is higher.	

OFI Reference	Condition Reference	IEA Finding	Recommendations	Status
OFI13	E87	Waste – waste segregation	Ensure waste segregation is followed on site to limit cross contamination of bins.	Waste management activities are reviewed by environmental professionals via regular site inspections. Waste segregations was observed to be implemented during the site inspection.
OFI14	E90	All waste generated during construction and operation must be classified in accordance with the EPA's Waste Classification Guidelines, with appropriate records and disposal dockets retained for audit purposes.	Ensure waste classification is undertaken for all material exported from site in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (NSW EPA, November 2014).	See above overview in E90 response.



Appendix E Site Inspection Photographs

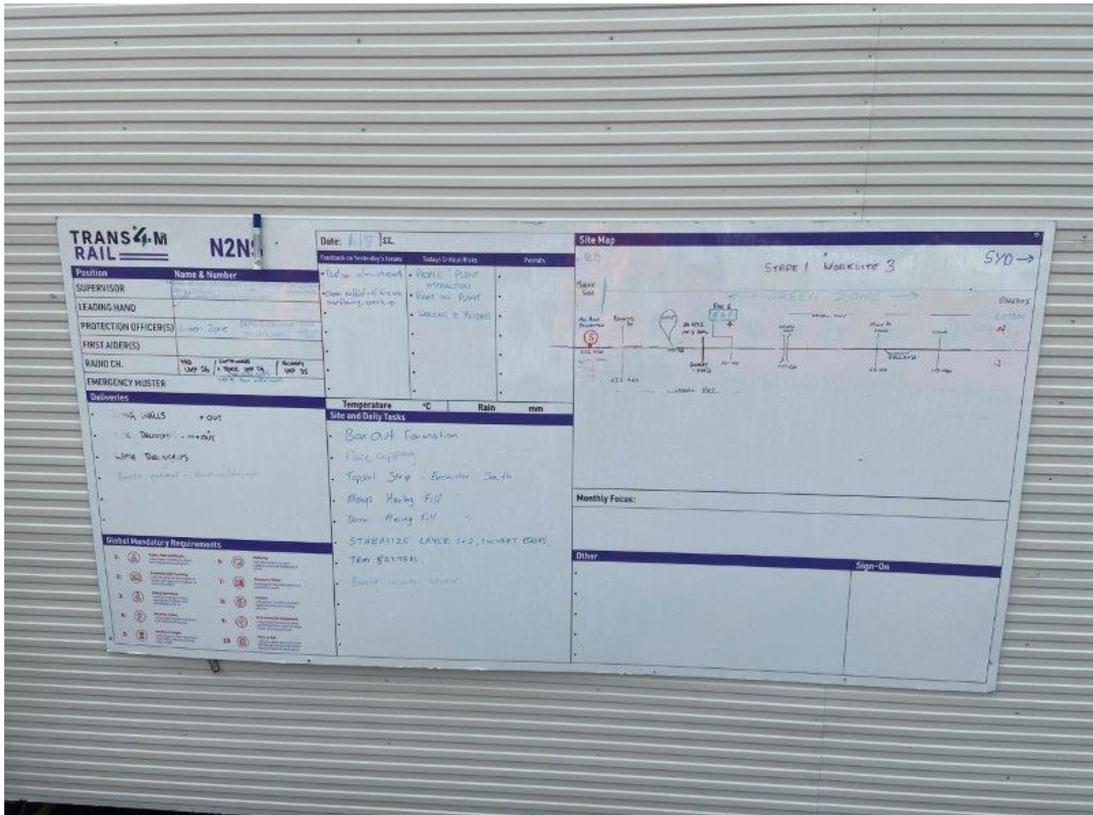


Plate 1 – PAD 6 Project Information Board



Plate 2 – PAD 6



Plate 3 – Subgrade installed in alignment



Plate 4 – Temporary stockpile not adequately managed in accordance with SWMP



Plate 5 – PAD 6 Dust Deposition Gauge



Plate 6 – Survey Tree at PAD 6



3

Plate 7 – Road located over root zone of survey tree at PAD 6



Plate 8 – Batter diversion along alignment CH621



Plate 9 – Temporary stockpile not adequately managed in accordance with SWMP along alignment CH621



Plate 10 – Bellata CH614.77 muddy condition along alignment



Plate 11 – Bellata CH614.77 clean water diversions



Plate 12 – Bellata CH614.77 clean water pump out location



Plate 13 – Bellata CH614.77 culverts



Plate 14 – Bellata platform works



Plate 15 – CH616.02 GeoLink on site during pre-clearance works.



Plate 16 – Lime storage area noted to be better managed with minimal to no spillage over road surfaces.

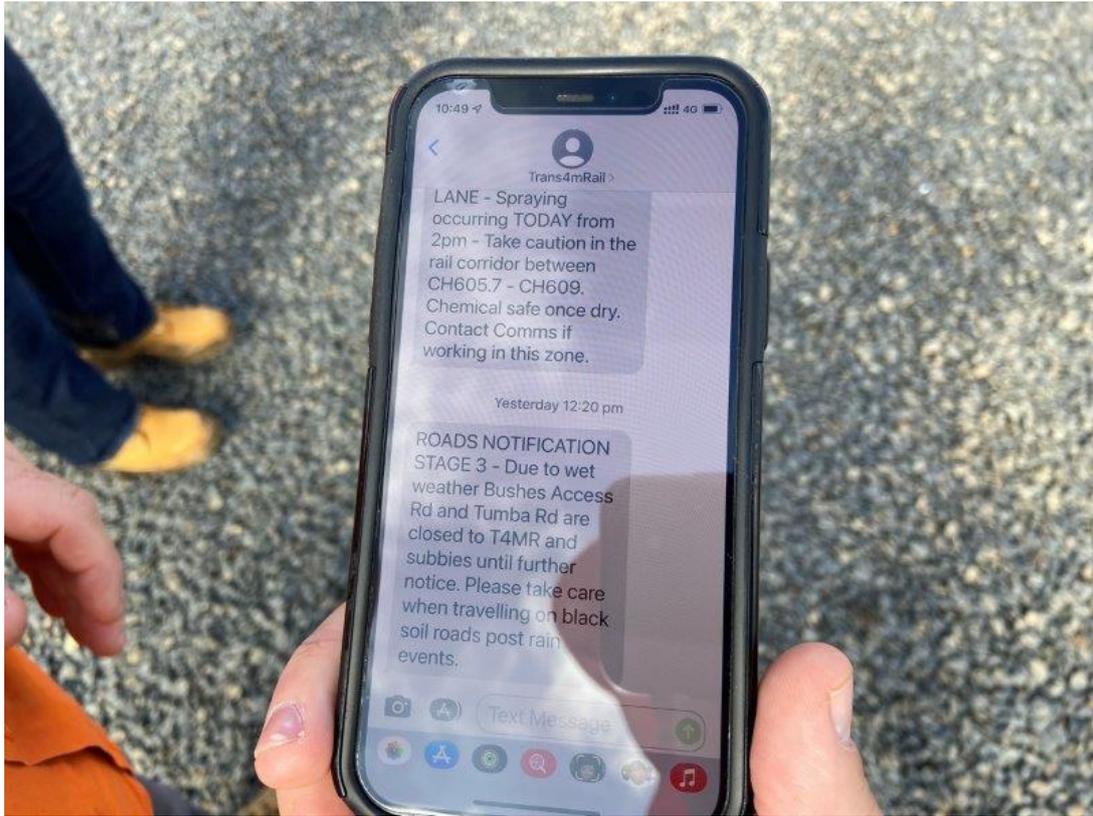


Plate 17 – Example of road closure alerts sent to all project staff



Plate 18 – Lime application in process.

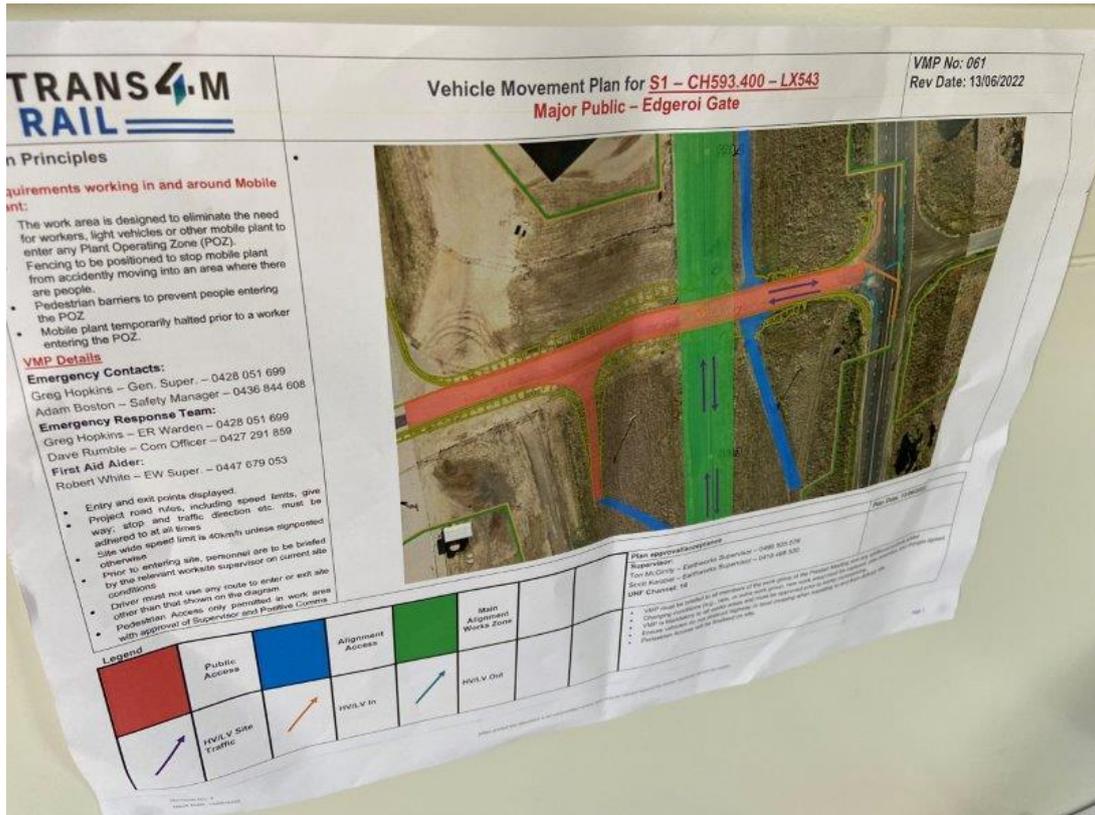


Plate 19 – Gate 7 vehicle movement plan

Pre-Start Meeting Record **TRANS 4 M RAIL**

Work Zone Please Circle	Red Site Job	Blue Site Job (Not Approved/Completed)	Green Clearance
----------------------------	------------------------	--	---------------------------

Protection Officer Required

Scope of Works: **Edgeroi Earthworks**

Worksite Location: **Edgeroi** Date & Time: **2/8/22 0600**

Site Supervisor: **Tori McCarty** PO / TFPC / TW: **Name and contact number**

PPD No: 0436 379 083 WWP Reference #:

Network Controller Emergency Contact No: (02) 4922 7576 Plant Supervisor: (if applicable):

Emergency Assembly Point: **Caravan**

First Aider Name: **Tori McCarty** First Aid Location: **Caravan + sites**

Emergency Warning Alarm: **Emergency x3** Emergency Services Access Point: **Gate 7 Edgeroi**

HAZARD IDENTIFICATION
(FAC, DO NOT COMMENCE WORK UNTIL RISK IS CONTROLLED)

Are controls in place to manage safe access & egress to work site?	Y	N	Is communication required with other work groups? IF YES, SPECIFY	Y	N
✓			UHF 16 + 14	✓	
Does the work affect track circuits, crossings, points or signals? IF YES, SPECIFY			Is a second form of communication available? IF YES, SPECIFY		✓
			Phone		

Relevant GMR's

Traffic, Plant and People (GMR 7)	Excavation and Trenching (GMR 2)	Lifting Operations (GMR 3)	Electrical Safety (GMR 4)	Working at Height (GMR 5)	Wellbeing (GMR 6)	Temporary Works (GMR 7)	Isolation (GMR 8)	Environmental Management (GMR 9)	Work on Rail (GMR 10)
-----------------------------------	----------------------------------	----------------------------	---------------------------	---------------------------	-------------------	-------------------------	-------------------	----------------------------------	-----------------------

Permit to Work Required

Working at Heights	Isolation	Work whilst suspended from a crane	Hot Work	Demolition
Working at Height Ladder	Confined Space	Grid mesh Installation/Commission	Excavation & Trenching	Abrasive Blasting
Clearing	Water Discharge	Out of Hours	Core hole	

Revision No: 1
Document Number: 1633-TAMR-FRP-POS-037
Please print this document as an unaltered version and must be checked against the RMS electronic version for validity.
Issue Date: 23/08/2021
Page 1 of 4

Plate 20 – Gate 7 Pre-start meeting record during site inspection



Plate 21 – Survey mark at Gate 7



Plate 22 – Sediment control structures within CIZ along with signposting at Gate 7



Plate 23 – Rumble grid utilised at Gate 7 MAF



Plate 24 – Spray grass applied to batter



Plate 25 – Bobbiwa Bridge



Plate 26 – Bobbiwa Bridge evidence of erosion of rock protection



Plate 27 – Bobbiwa Bridge minor material located within pipes



Plate 28 – Delineated CIZ with flagging and signage



Plate 29 – 10 Mile Creek Bridge



Plate 30 – 10 Mile Creek Bridge evidence of pad erosion



Plate 31 – 10 Mile Creek pilling pad blockage



Plate 32 – 10 Mile Creek concrete spillage on piling pad



Plate 33 – 10 Mile Creek pilling pad blockage



Plate 34 – PAD 2 Gurley Bridge temporary stockpile



Plate 35 – PAD 2 Gurley Bridge weeds noted during inspection



Plate 36 – PAD 2 Gurley Bridge



Plate 37 – PAD 2 Gurley Bridge causeway with indications of sediment migration and erosion downstream



Plate 38 – Yallaroi laydown stockpile contaminated with foreign materials



Plate 39 – Yallaroi laydown poor house keeping observed



Plate 40 – Yallaroi laydown poor house keeping observed



Plate 41 – Croppa Creek Bridge



Plate 42 – Croppa Creek Bridge



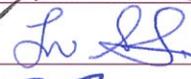
Appendix F **Opening and Closing** **Meeting Records**

MEETING ATTENDANCE RECORD

Project:

Meeting Purpose: CLOSING MEETING. Date: 3-8-22

Location: ARTC OFFICE Time: 1500

Name	Role	Signature
Sam Mclell	Auditor	
Justin Bate	HSE Superintendent	
GRANT BROWN	SENIOR ENV. ADVISOR	
Tina Stewart	Environment Manager - Delivery	
PETER BORELLE	PROJECT DIRECTOR	
IAN RICHARDSON	LEAD AUDITOR	

From: [Belinda Jones](#)
To: [Ian Richardson](#); [Sam Mitchell](#)
Subject: IEA 3 Attendees Close Out
Date: Wednesday, 3 August 2022 3:07:40 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

CAUTION: This email originated from outside of RPS.

PB Peter Borrelli
No response

TS Tina Stewart
Accepted

JB Justin Bate
No response

GB Grant Brown
Accepted

PD Pippa Donaldson-N2N

AP Adam Playne-N2N

Belinda Jones
Organizer

CD Catriona Dowdin... (External)
External

GK Ganesh Kumar-... (External)
External

GB Georgia Butler-... (External)
External

GM Geraint Matthew... (External)
External

IR Ian Richardson (External)
External

SM Sam Mitchell (External)
External

TL Tim Lennon

0456957280 | BJones2@ARTC.com.au

Level 16, 180 Ann Street, Brisbane QLD 4000

inlandrail.com.au | [f](#) [@](#) [in](#) [t](#) [v](#)

--

The information in this email and any attachments to it is confidential to the intended recipient and may be privileged. Receipt by a person other than the intended recipient does not waive confidentiality or privilege. Unless you are the intended recipient, you are not authorised to disseminate, copy, retain or rely on the whole or any part of this communication. If you have received this communication in error please notify ARTC on +61 8 8217 4366. While we have taken various steps to alert us to the presence of computer viruses we do not guarantee that this communication is virus free.

 **Please consider the environment before printing this email**