

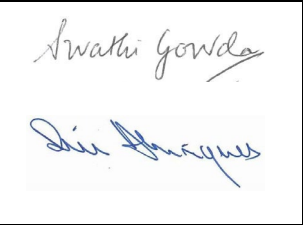
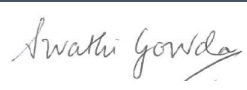
OPERATIONAL INDEPENDENT AUDIT NO. 1 (IA1) AUDIT REPORT

Narrabri to North Star

SSI 7474

November 2024

Authorisation

Author names	Swathi Gowda Rui Henriques	Reviewer / approver name	Swathi Gowda
Author positions	Lead Auditor Auditor/Audit Team Member	Review position	Lead Auditor
Author signatures		Reviewer / approver signature	
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Prepared for:

ARTC

Level 3/1 Richmond Road
Keswick Terminal SA 5035

Prepared by:

Rui Henriques and Swathi Gowda

Healthy Buildings International Pty Ltd
Suite 2.06, Level 2, 29-31 Solent Circuit
Norwest NSW 2153

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Contents

EXECUTIVE SUMMARY 5

1. INTRODUCTION 6

 1.1 The Project 6

 1.1.1 Overview6

 1.1.2 Changes to the Project6

 1.1.3 Staging 8

 1.1.4 Works conducted during the audit period 8

 1.2 Audit team 10

 1.3 Audit objectives 10

 1.4 Audit scope 11

 1.5 Audit period 12

2. AUDIT METHODOLOGY 13

 2.1 Audit process 13

 2.2 Audit process detail 13

 2.2.1 Audit initiation and scope development13

 2.2.2 Preparing audit activities 15

 2.2.3 Personnel involvement 15

 2.2.4 Meetings 17

 2.2.5 Site inspection 17

 2.2.6 Document review and interviews 17

 2.2.7 Generating audit findings 18

 2.2.8 Compliance evaluation 18

 2.2.9 Evaluation of post audit approval documentation 19

 2.2.10 Completing the audit 19

3. AUDIT FINDINGS 20

 3.1 Approvals and documents audited, and evidence sighted 20

 3.2 Non-compliances and Observations 20

 3.3 Adequacy of OEMF and post approval documents 25

 3.4 Summary of notices from agencies 25

 3.5 Other matters considered relevant by the Auditor or DPHI 26

 3.6 Environmental Performance 29

 3.6.1 Actual vs Predicted Impacts 29

 3.6.2 Physical extent of the development 29



3.6.3	Incidents and non-compliance.....	29
3.6.4	Complaints	29
3.6.5	Compliance	29
3.6.6	Adequacy of Operational Environmental Management Framework.....	30
4.	CONCLUSION.....	31
5.	LIMITATIONS.....	32
APPENDIX A – SSI 7474 CONDITIONS OF APPROVAL AUDIT TABLE		33
APPENDIX B – AGREEMENT OF INDEPENDENT AUDITORS		34
APPENDIX C – AUDIT PLAN AND ATTENDANCE RECORDS		35
APPENDIX D – CONSULTATION RECORDS		36
APPENDIX E – SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS.....		37
APPENDIX F – DECLARATIONS.....		41



EXECUTIVE SUMMARY

This report presents the findings of the operational Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with audit site inspection on 12 November 2024 of the Inland Rail, Narrabri to North Star Phase 1 project (“the Project”), State Significant Infrastructure (SSI) 7474.

This audit is the first operational Independent Audit (IA1) conducted for the Project; the temporal period covered by the audit is from the date of commencement of operations (i.e. 27 October 2023) to the date of the audit site inspection on 12 November 2024 and as described within this report.

The purpose of this audit was to undertake the necessary assessment and review of compliance with SSI 7474 Conditions of Approval, and the implementation and effectiveness of environmental management and mitigation measures in the Operational Environmental Management Framework (OEMF) and associated Procedures. Specifically, this audit was required to satisfy Condition A36 of SSI 7474 which requires Independent Audits of the development to be carried out in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

In summary, a total of **166 conditions** were assessed, four (4) non-compliances were identified, and four (4) observations were identified during this Audit.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to operations that formed a part of the Audit Scope. The level of implementation of these requirements was also observed as high.

The Auditors would like to thank the Auditees from ARTC for their organisation, cooperation and support during the conduct of the audit.



1. INTRODUCTION

This report presents the findings of the operational Independent Audit conducted by Healthy Buildings International Pty Ltd (HBI) commencing with site inspections on 12 November 2024 of the Inland Rail, Narrabri to North Star Phase 1 project, State Significant Infrastructure (SSI) 7474.

This audit is the first operational Independent Audit conducted for the Project and has been conducted in accordance with the Independent Audit Post Approval Requirements (IAPARs) dated May 2020 (DPIE, 2020).

1.1 The Project

1.1.1 Overview

Australian Rail Track Corporation (ARTC) submitted a State Significant Infrastructure (SSI) development application to construct and operate the Narrabri to North Star Phase 1 section of the Inland Rail project under Part 5, Division 5.2 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). Minister's Conditions of Approval (MCoA's) were issued for the Critical State Significant Infrastructure (CSSI) Project No 7474 Narrabri to North Star, Phase 1 on 13 August 2020 (N2NS SP1 Planning Approval).

The Narrabri to North Star Phase 1 (N2NS SP1) stage of the project (the Project) runs between Narrabri to Moree and Camurra to North Star and includes upgrading approximately 171 km of track along the existing corridor. Refer Figure 1 for Project location and context.

The key features of the Project include:

- Upgrade of the track, track formation, underbridges and culverts within the existing rail corridor in two sections: - between Narrabri and Moree; and between Camurra and North Star;
- Five new crossing loops within the existing rail corridor, at Bobbiwaa, Waterloo Creek, Tycannah Creek, Coolleearlee, and Murgo;
- Realigning approximately 1.5 kilometres of the Newell Highway near Bellata;
- A replacement rail bridge at Croppa Creek;
- A replacement road bridge on the Newell Highway over the rail corridor; and
- A new road bridge over the existing rail corridor in Moree.

1.1.2 Changes to the Project

Project Approval SSI 7474 for the N2NS Phase 1 Project was issued on 13 August 2020 to ARTC.



Modifications

The Project Approval has been modified outside of this audit period, so is not considered further in this audit, but is summarised below for completeness:

Modification 1 (SSI 7474 Mod 1) determined on 24 August 2022: The modification included amendments to incorrect condition references - A18, C5, C6, E10, E11, E38, E42, E67, E72 correcting the referencing of condition C0 to condition C4.

Consistency Assessments

There were no Consistency Assessments determined or approved by ARTC within this audit period:

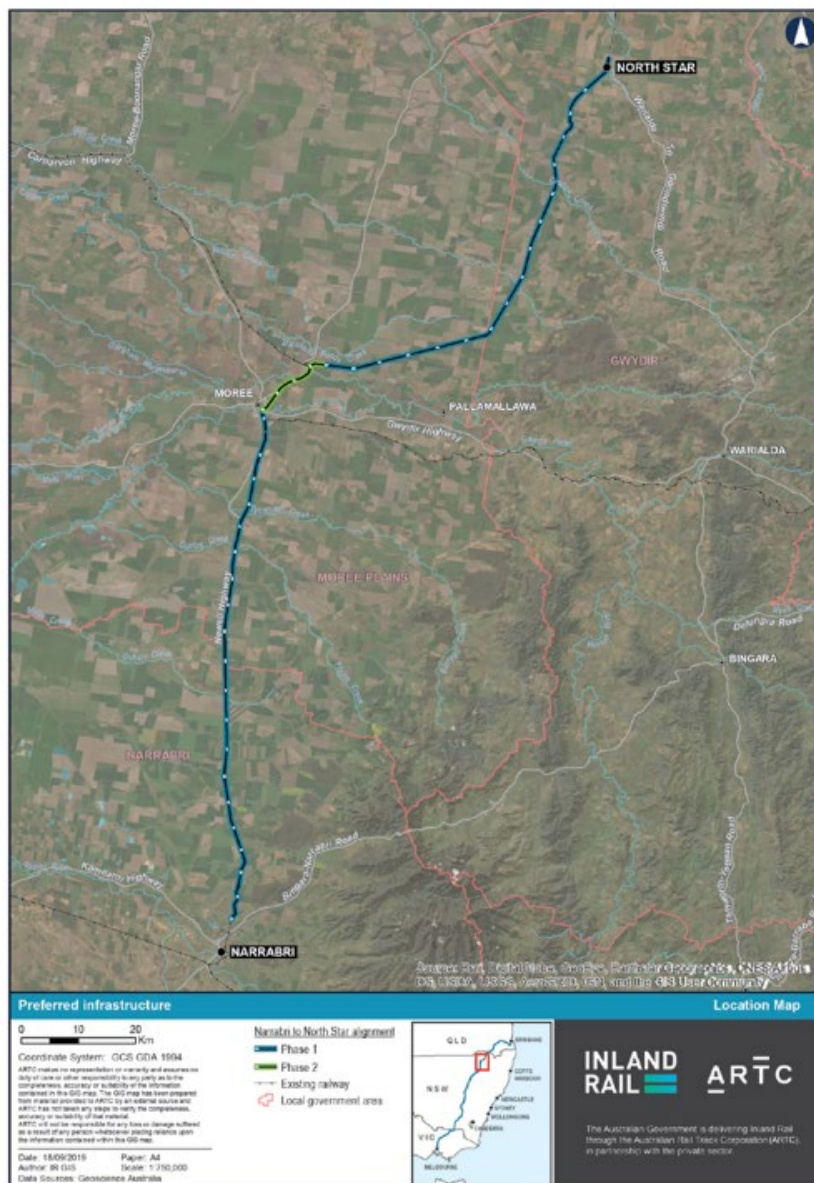


Figure 1: Project Location and Context (Source: SPIR)



1.1.3 *Staging*

The Project's Operational Staging Report (5-0000-260-EEC-00-RP-0010, dated October 2023) was prepared to address the requirements of Conditions of Approval (CoA) A11 to A15 of the SSI 7474 Planning Approval and submitted to DPPI on 12 October 2023, outside of this audit period.

1.1.4 *Works conducted during the audit period*

The Auditees indicated that the Project commenced operation on 27 October 2023. Operations related activities completed during the audit period are summarised below as detailed in the Environmental Representative's Monthly Reports:

- October/November 2023
 - Continued with Temporary Land Occupation (Part A / Part B process) signoff (including remediation works) for third party land occupied by the Project.
 - Landscape rectification works (i.e. drill seed and hydromulch) across areas displaying minimal groundcover.
 - EPL Relinquishment Inspections with the NSW EPA.
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- December 2023
 - Continued with Temporary Land Occupation (Part A / Part B process) signoff (including remediation works) for third party land occupied by the Project.
 - Landscape rectification works (i.e. drill seed and hydromulch) across areas displaying minimal groundcover.
 - EPL Relinquishment Inspections with the NSW EPA.
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- January 2024
 - Completed Temporary Land Occupation (Part A / Part B process) signoff (including remediation works) for third party land occupied by the Project.
 - Adjust the EPL Premise Boundary to remove Stage 1 from the Project EPL.
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- February 2024
 - Completed EPL Relinquishment Inspections with the NSW EPA.
 - Completed remaining signalling and civil defects.
 - Some enhancement work for Five Clawed Worm Skink (FCWS) monitoring sites.



- Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- March 2024
 - Submitted the EPL Relinquishment Application.
 - Completed remaining signalling and civil defects.
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- April 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- May 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- June 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- July 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- August 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- September 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.
- October 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.



- November 2024
 - Operations comprising a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains, rather than Inland Rail operation and associated track capacity increases.

1.2 Audit team

In accordance with Condition of Approval (CoA) A35 of SSI 7474, and Section 3.1 of the Independent Audit Post Approval Requirements (IAPAR), independent audits must only be undertaken by a suitably qualified, experienced and independent auditor; with the appointment of the auditor agreed in writing by the Planning Secretary before each audit is commissioned.

Endorsement of the audit team was provided by the NSW Department of Planning, Housing and Infrastructure (DPHI) on 5 September 2024. The endorsement is presented in **Appendix B**. Declarations from the Auditors are presented in **Appendix F**. Table below presents the audit team for this first operational Independent Audit on the Project.

Table 1.1 Audit Team

Name & Position	Company	Audit Role	Certification
Swathi Gowda	Healthy Buildings International Pty Ltd (HBI)	Lead Auditor	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-442234)
Rui Henriques	Healthy Buildings International Pty Ltd (HBI)	Auditor / Audit Team Member	Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor (Certificate No. C-486435)

1.3 Audit objectives

This first operational Independent Audit is to satisfy CoA A36 (refer below) of the State Significant Infrastructure (SSI) 7474 planning approval for the Project, which states:

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

This first operational Independent Audit (IA1) aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs), which sets out the audit methodology and reporting requirements for the Independent Audit.

The audits would be conducted at least as frequently as specified in Table below:



Table 1.2 Operational Audit Frequency (IAPARS, May 2020)

Phase	Initial Independent Audit	Ongoing Independent Audit Intervals
Operation	Within 26 weeks of the commencement of operation	At intervals, no greater than 3 years or as otherwise agreed by the Secretary.

The first operational independent audit has not occurred as per CoA A36 and above IAPARS requirements. This non-compliance has been self-reported by ARTC and is detailed in Table 6.

1.4 Audit scope

The first operational Independent Audit comprises of four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance and Reporting. The scope of the first operational Independent Audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARS:

- an assessment of compliance with SSI 7474 (as modified; the Approval), in particular those conditions and requirements which are applicable to the operational phase of the Project (i.e. since operation commencement on 27 October 2023);
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans established in relation to Operation, namely the Operational Environmental Management Framework (OEMF);
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment.
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans established in relation to Operation, namely the OEMF is adequate; and



- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

1.5 Audit period

The temporal period covered by the audit is from the date of commencement of operations (i.e. 27 October 2023) to the date of the audit site inspection on 12 November 2024. HBI understands from the Client (ARTC) that 27 October 2023 is the date of commencement of operations, as per email correspondence from ARTC on 18 October 2024.



2. AUDIT METHODOLOGY

2.1 Audit process

The first operational Independent Audit was conducted in a manner consistent with the below reference documents and evidence submitted for review during the audit:

- Independent Audit Post Approval Requirements (DPIE, 2020)
- ISO 14001: 2015 Environmental Management Systems
- AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems

2.2 Audit process detail

2.2.1 *Audit initiation and scope development*

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

- ARTC
- Inland Rail (subsidiary of ARTC); and
- Local Operations Team

Personnel representing the Auditees are identified in Section 2.2.3 of this first operational Independent Audit Report. Prior to the commencement of the audit the following tasks were completed:

- Confirmation of the DPHI approved audit team;
- Consultation with DPHI on the audit scope; and
- Development of an Audit Plan detailing the audit objectives, scope, audit period and indicative audit program.

The Lead Auditor consulted with DPHI on 25 September 2024 to obtain inputs to the scope of this first operational Independent Audit in accordance with Section 3.2 of the IAPARs.

DPHI responded on 09 October 2024 with no further requirements for consultation with other parties or agencies. A summary of the key issues and areas of focus raised by DPHI is presented in Table 2. Consultation records are presented in **Appendix D**.



Table 2: Key issues and areas of focus raised during stakeholder consultation

Stakeholder Consulted	Key Issues and Areas of Focus	How Addressed including Reference
<p>Department of Planning, Housing and Infrastructure (DPHI)</p>	<p>Scope consultation correspondence sent to DPHI on 25 September 2024. DPHI responded on 09 October 2024 requesting:</p> <p><i>“...the IEA is conducted in accordance with Condition A36 of the Approval, which requires the audit to be carried out in accordance with the Independent Audit Post Approval Requirements (May, 2020). In addition, careful consideration and commentary should be provided for the following matters:</i></p> <p><i>a) The status of flood mitigation measures following the April 2024 weather event in the Croppa Creek region of the Project.</i></p> <p><i>b) The current status of rectification work to Bulldog Creek, Pan Creek and Boggy Creek. The assessment to include, but not be limited to:</i></p> <ul style="list-style-type: none"> - <i>the status of the decision-making process for planning pathways for each creek to facilitate the completion of remediation works;</i> - <i>the status of landholder negotiations and/or property owner agreements for each creek with consideration to property access and easement agreements;</i> - <i>the status of the design development phase, including the extent of each erosion impacts to each impact;</i> - <i>the proposed schedule for completion of all rectification works for each creek; and</i> - <i>a summary of the procurement status of contractors responsible for conducting the rectification work.</i> <p><i>The above matters must be clearly addressed in the body of the IEA report and must be separate to the compliance status for related conditions of Approval.</i></p>	<p>This audit was conducted in accordance with CoA A36 and the IAPARs.</p> <p>Assessment of compliance with SSI 7474 Conditions, as applicable to the operational phase of the Project (as noted in Section 1.4). Refer Audit Table within Appendix A.</p> <p>Environmental performance assessment (including but not limited to actual versus predicted impacts) is included in Section 3.6.</p> <p>A high-level assessment of the environmental management plans and sub-plans as related to Operation is included in Sections 3.3 and 3.6</p> <p>DPHI scope is summarised in Section 3.5, with a detailed review of Conditions for e.g. A4, B9, D3, E27, E28, E29, E32, E33, E35, E60, and E61 to address DPHI’s request and is included in the Audit Table against these specific conditions, as relevant (refer Appendix A). Where these specific conditions may have interactions with other CoAs, an assessment of those requirements have been included as audit evidence and findings in the Audit Table (refer Appendix A).</p> <p>Consideration and commentary for DPHI matters a) and b) are provided separately in Section 3.5 and Table 7 of this Audit Report.</p>
<p>Independent Environmental Representative (ER)</p>	<p>ER Audit Interview/scope discussion conducted on 4 November 2024 (Teams Meeting) in relation to:</p> <ul style="list-style-type: none"> • Scope consultation received from DPHI; and • Any key issues or areas of concerns to be included in this Audit – no additions to the scope were requested. 	<p>Not Applicable</p>



2.2.2 *Preparing audit activities*

The Lead Auditor performed a document review, prepared an Audit Plan with an indicative program and prepared an Audit Table (refer **Appendix A**) for this operational Independent Audit. The proposed audit plan was provided to ARTC on 4 November 2024 (refer **Appendix C**), in preparation for the Audit.

2.2.3 *Personnel involvement*

Table 3 presents the involvement of key personnel representing the Auditees in this first operational Independent Audit.

Opening and closing meeting attendance is presented separately in **Appendix C**.



Table 3: Key personnel involved

Organisation	Project Stage	Position Title	Name	Involvement
ARTC	Stage 3 – Operations	Operational Readiness – Environment Advisor ARTC Interstate Network	Tyler Warren	Opening/closing meetings (refer Appendix C Attendance), audit interview, site inspection and document review
ARTC	Stage 3 – Operations	Lead – Environment Systems Safety & Environment	Brodie McDougall	Opening/closing meetings (refer Appendix C Attendance), audit interview, site inspection and document review
ARTC	Stage 3 – Operations	Senior Manager Environment Systems	Stuart Ross	Closing meeting (refer Appendix C Attendance)
Inland Rail	Stages 1 and 2	Project Director N2NS	Peter Borrelli	Closing meeting (refer Appendix C Attendance), audit interview.
Inland Rail	Stages 1 and 2	HSE Manager	Justin Bate	Closing meeting (refer Appendix C Attendance), audit interview.



2.2.4 Meetings

Opening and closing audit meetings were held, as follows:

- Opening meeting: 12 November 2024
- Closing meeting (Teams): 27 November 2024

Opening and closing meeting attendance is presented in **Appendix C**.

2.2.5 Site inspection

An audit site inspection was conducted on 12 November 2024 as part of this first operational Independent Audit by the Lead Auditor and Auditor. During the site inspection the weather conditions were generally warm and sunny, with the daytime temperature ranging from approx. 24°C to 33°C. No rainfall was recorded in the week prior to the site inspection, with all areas inspected demonstrated significant dry conditions from limited rainfall in the prior four months. The following sites were visited during the site inspection:

- Bulldog Creek
- Pan Creek
- Boggy Creek
- Croppa Creek
- Areas of rail alignment affected by April rain event - North of Boonery Park Rd, North Star, to Tikitere Quarry
- Five Claw Worm Skink Monitoring Sites North of Boonery Park Rd, North Star

Site inspection observations and photographs are presented in **Appendix E – Table E**.

2.2.6 Document review and interviews

The first operational Independent Audit included investigation and review of documents, reports and records to evaluate compliance. Interviews with key Project personnel were conducted and further documentary evidence was also sought to verify responses provided by Auditees during the course of the audit.

Refer to Section 2.2.3 for details on the personnel interviewed. Audit interviews and document review sessions were conducted with the Auditees as follows:

- Environmental Representative 4 November 2024 (via Teams)
- Auditees: 14 November 2024 (via Teams)

In addition to the above, the Auditors requested further information to obtain evidence that was not accessible or available during the audit interviews and document reviews. These requests were provided promptly by the Auditees within required timeframes.



2.2.7 *Generating audit findings*

Independent Audit findings were based on verifiable evidence collected and reviewed. The evidence included:

- Relevant correspondence from DPHI and any other stakeholders;
- Review of relevant records, documents and specialist reports;
- Interviews with relevant personnel;
- Figures, plans and photographs;
- Site inspections of relevant locations, activities and processes;
- Monitoring data and/or analysis;
- Other applicable approvals, permits, records or Project-specific environmental requirements (as documented within the Audit Table in Appendix A).

2.2.8 *Compliance evaluation*

Evaluation of compliance has been carried out in accordance with Section 3.7 of the IAPARs and documented in an Audit Table, which includes the conditions of SSI 7474. The compliance status of each compliance requirement in the Audit Table has been determined using the relevant descriptors in Section 3.8, Table 2 of the IAPARs, as listed in Table, below:

Table 4: Compliance descriptors from Table 2 of the IAPAR

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

As part of this first operational Independent Audit evaluation, the Auditors have made observations and notes to provide context, identify any opportunities for improvement (OFI) in relation to any compliance requirement or any other aspect of the Project. This includes any positive observations where the project has applied initiatives beyond compliance requirements.

The compliance status has been attained by assessing a representative sample of documents, records and data for each requirement in the audit period prescribed. Observations on-site during the audit site inspections are based on current activities and assumed to be representative of ARTC's performance across the Project.



2.2.9 *Evaluation of post audit approval documentation*

The Auditors reviewed and assessed whether post approval documents relevant to the operational Stage:

- have been developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate;
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents was determined on the basis of whether:

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

2.2.10 *Completing the audit*

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



3. AUDIT FINDINGS

3.1 Approvals and documents audited, and evidence sighted

Key documentation reviewed as part of the audit are listed below. This list is not exhaustive. The full set of documents and relevant evidence sighted against each requirement is detailed within the Audit Table (refer **Appendix A**).

- Inland Rail Programme Narrabri to North Star Project - Environmental Impact Statement (EIS), (dated 3 November 2017)
- Inland Rail – Narrabri to North Star Project (SSI – 7474) Response to submissions on the SPIR (26 May 2020)
- Narrabri to North Star Phase 1: Operational Staging Report (October 2023)
- Consolidated Minister’s Conditions of Approval (SSI 7474) (as modified, the Approval)
- SSI 7474 MOD 1 Instrument of Modification (dated 24 August 2022)
- "Narrabri to North Star 100% Detailed Design Report", March 2019 RevA, dated 15/03/2022.
- Narrabri To North Star Phase 1: Operational Staging Report October 2023
- Operations Compliance Report - October 2024 SSI 7474 – Inland Rail Narrabri to North Star SP1 Project, Revision D, dated 24/10/2024
- Narrabri to North Star Phase 1 Communication Strategy 50000-260-PCS-00-ST-0001_D (Revision 2), dated 20/01/2021.
- EHS-PR-001 – Operational Environmental Management Framework (OEMF), Version 1.4, dated February 2024.
- Community Communication Strategy (Rev 2, dated 20 January 2021)
- Complaints Register - 13 October 2023 to 25 October 2024
- "Narrabri to North Star Operational Noise and Vibration Review for Phase 1", March 2022 Rev H, dated 18/03/2022.
- Incident and Non-Compliance Register – Horizon 360
- Narrabri to North Star Flood Design Verification Report for Phase 1 Issued For Construction", July 2022 Rev 0, dated 5/07/2022
- April 2024 Event Flood Review Report Inland Rail Narrabri to North Star Phase 1", July 2024 Rev D, dated 9/07/2024

3.2 Non-compliances and Observations

This Section presents findings from the first operational Independent Audit. A summary of conditions assessed and compliance status from the first operational Independent Audit is presented in Table 5. Detailed audit findings and evidence against each requirement is presented in the Audit Table (refer **Appendix A**).



Table 5: Summary of conditions assessed and compliance status from the first operational Independent Audit

Part of the Project Approval	No. of conditions assessed	Compliance status		
		Compliant	Non-compliant	Not triggered
Part A	41	18	2	21
Part B	11	5	0	6
Part C	20	0	0	20
Part D	4	3	0	1
Part E	90	21	1	68
Total	166	47	3	116

Note: Table reflects three (3) non-compliant conditions; however, two (2) NCs were identified against CoA A28, one self-reported by ARTC and one raised as part of this Audit. There were also two (2) other NCs identified, one against each CoA A36 (self-reported) and CoA E32.

With respect to this first operational Independent Audit:

- 166 conditions were assessed.
- 4 non-compliances were identified, 2 of which had been self-reported by ARTC during the audit period.
- 47 conditions were considered to be compliant.
- 116 conditions were considered not triggered.

In addition to the above, four (4) observations were identified. These are detailed in **Table 6**.

Nil additional non-compliances or observations were identified with the OEMF and during the Site Inspection on 12 November 2024.



Table 6: First Operational Independent Audit Findings

Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
IA01 – NC01	CoA A28 (j)	Non-compliance	<ul style="list-style-type: none"> CoA A28 (j) states <i>“For the duration of the works until 12 months after the completion of construction, the approved ER must:</i> <ul style="list-style-type: none"> <i>(j) 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.”</i> 	<p>Self-reported Non compliance</p> <p>The ER monthly report for September 2024 was submitted on 9 October 2024 rather than on the 7 October 2024, with no extension sought from the Planning Secretary. This non-compliance was also reported in the ER Monthly Report for October 2024 (Section 3.5), where the ER indicated that <i>“as the 7 October was a Monday public holiday in NSW this only allowed only 4 working days to prepare the report, which would then have to have been submitted on the previous Friday, the 4 October”</i>.</p>	<p>Recommend that the ER seek an extension under Condition A6 of submission of future ER monthly reports when a minimum of 5 business days are not available following the end of each month to prepare the respective ER monthly report.</p>	OPEN
IA01 – NC02	CoA A28 (d) i)	Non-compliance	<ul style="list-style-type: none"> CoA A28 (d) i) states <i>“For the duration of the works until 12 months after the completion of construction, the approved ER must:</i> <ul style="list-style-type: none"> <i>(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:</i> <ul style="list-style-type: none"> <i>(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).”</i> 	<p>The Narrabri to North Star Phase 1: Operational Staging Report, October 2023 was submitted to the Planning Secretary for approval in accordance with CoA A11, however, evidence of ER endorsement of the document was not available to the Auditor.</p>	<p>Recommend that Inland Rail / ARTC seek ER endorsement of any future Staging Reports prepared under Condition A11.</p>	OPEN
IA01 – NC03	CoA A36	Non-compliance	<ul style="list-style-type: none"> CoA A36 states <i>“Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020)”</i> 	<p>Self-reported Non compliance</p> <p>The initial Operational Independent Audit (this Audit) was not conducted within 26 weeks of commencement of operation as required by the Independent Audit Post Approval Requirements (2020).</p>	<p>Auditors note this Condition has been addressed with the conduct of this first operational independent audit.</p> <p>Recommend that next operational audit is carried out as per this Condition and IAPARs.</p>	OPEN



Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
IA01 – NC04	CoA E32(c) ii)	Non-compliance	<ul style="list-style-type: none"> CoA E32(c) ii) states “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: <ul style="list-style-type: none"> (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: 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. 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. 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. 	Identification of specific 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 were not provided in the Flood Review Report for the April 2024 flood event. The Flood Review Report simply states that rectification measures would be determined in consultation with the landowner in accordance with the procedures within the Communications and Engagement Plan for Narrabri to North Star Phase 1 Interim Operations (Inland Rail, December 2023), which consists of a general framework only.	Given the inherent complexities associated with the investigative aspects of the Flood Review Report and formulation of feasible and reasonable rectification measures in consultation with the affected third parties, it is recommended that for future Flood Review Reports the Project seek an extension under Condition A6 for submission in a staged manner, with identification of specific rectification measures and responsibilities for implementation addressed in an addendum to the report submitted within a timeframe agreed with the Secretary for the particular event.	OPEN
IA01 – OFIO1	CoA D2	Observation	<ul style="list-style-type: none"> CoA D2 states “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: <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 approval can be achieved; (b) issues identified through ongoing risk analysis can be managed; and (c) procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.” 	While the correspondence provided appear to provide evidence of ongoing acknowledgment by the Secretary of the OEMF without requirement for alteration and, therefore, appears to provide evidence of tacit written satisfaction of the Secretary, it does not ultimately provide evidence “of the written satisfaction of the Secretary, that through the” OEMF (a) (b) and (c) of CoA D2 are met.	Recommended that ARTC seek the written satisfaction of the Secretary that (a) (b) and (c) of CoA D2 are met through the OEMF as required by the Condition.	OPEN



Item	Ref	Type	Requirement (relevant excerpts)	Audit Finding – also refer Audit Table (Appendix A) for further detail	Recommended or completed action, by Whom and When (including Auditees Response, where applicable)	Status
IA01 – OFI02	CoA E35 (g)	Observation	<ul style="list-style-type: none"> CoA E35 (g) states <i>“The CSSI must be designed, constructed and operated so as to: (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;”</i> 	While various measures have been implemented in an attempt to ensure all discharges from new or modified surface drainage adjacent to the new and upgraded track are released at a controlled rate, significant scour was observed at chainage 745.879 km where surface water drains towards a culvert. The scour appears to be due to the poor design of local erosion and sediment control measures and has resulted in significant damage to a track access road rendering it unusable/inaccessible.	Recommended that an appropriate design be developed for the area by a suitably qualified designer and implemented.	OPEN
IA01 – OFI03	CoA E60 (b)	Observation	<ul style="list-style-type: none"> CoA E60 (b) states <i>“Permanent spoil mounds are to be located: (b) at least 50 metres from any watercourse or culvert or where the rail formation is predicted to be overtopped during a flood event;”</i> 	Small (less than 1 m high) mound located adjacent culvert at chainage 745.430 as outlined in the 4 to 6 April flood event Flood Report and observed during the Audit inspection. This small mound is partially blocking the predominant north to south flow path along the western side of the rail corridor and diverting more flow locally through culvert, causing soil erosion across the adjacent cropping paddock during the April 2024 event.	It is recommended that ARTC remove the small mound as a matter of priority to prevent further soil erosion within the adjacent cropping paddock.	OPEN
IA01 – OFI04	CoA E80 (g)	Observation	<ul style="list-style-type: none"> CoA E80 states <i>“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.”</i> 	While various erosion and sediment controls were attempted to minimise any water pollution at the particular location, significant scour was observed at chainage 745.879 km. where surface water drains towards a culvert. The scour appears to be due to the poor design of local erosion and sediment control measures and has resulted in significant damage to a track access road, rendering it unusable/inaccessible.	It is recommended that erosion and sediment controls in accordance with guidance in the Managing Urban Stormwater series be designed for the area by a suitably qualified designer and implemented.	OPEN



3.3 Adequacy of OEMF and post approval documents

As part of the Audit, the Auditors reviewed the Operational Environmental Management Framework (refer Section 3.1 for references) and conducted a high-level assessment of whether the above documents:

- have been developed in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate; and
- have been implemented in accordance with the conditions and all other environmental licences and approvals applicable to the Project (if any).

The Auditors also assessed the adequacy of post approval documents (on the basis of whether):

- there are any non-compliances resulting from the implementation of the document; or
- whether there are any opportunities for improvement.

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

3.4 Summary of notices from agencies

During the conduct of the first operational Independent Audit and interviews, the Auditees have confirmed that the only notice from agencies during the Audit Period was the following Warning Letter Received from the Australian Government Department of Climate Change, Energy, the Environment and Water:

- *Warning Letter - Contravention of Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) approval for Narrabri to North Star Section of Inland Rail, (EPBC 2016/7729), dated 11 October 2024. The Warning Letter relates to failures to adequately report incidents relating to Five Claw Worm Skink monitoring.*



3.5 Other matters considered relevant by the Auditor or DPHI

The Auditors are not aware of any other matters considered relevant by DPHI other than inputs from DPHI during consultation on the scope of this first operational Independent Audit (refer Table 2 and where addressed).

As requested by DPHI, theta below presents a review of key DPHI scope consultation issues and areas of concerns reviewed as part of this first operational Independent Audit and summarised below:

Table 7: Key issues and areas of focus raised by DPHI

Key Issues and Areas of Focus	Assessment and commentary
<p>a) <i>The status of flood mitigation measures following the April 2024 weather event in the Croppa Creek region of the Project.</i></p>	<p>Based on audit interviews and the evidence provided by Inland Rail it is understood that the status of rectification works and improvements to measures following the April 2024 weather event in the Croppa Creek region of the Project is as follows:</p> <ul style="list-style-type: none"> • Morton Property – Redesign of drainage / flood mitigation measures is now complete. Agreement reached with property owner for associated works to be completed by the property owner under a compensation release arrangement. Formal agreement yet to be drawn-up and executed. No timing provided for formal agreement execution. According to consultation manager, last contact was on 22/11/24, confirming a meeting on 29 November 2024 “to go through the design and discuss the process of the deed and release in further detail.” • Public School and Principal’s Residence – Meeting held with Homes NSW - Teacher Housing (Homes NSW) on 25/10/24. Based on minutes of meeting, Inland Rail discussed the issues around the incorrect predictions in initial modelling, due to deficient anecdotal data, resulting in compliant impacts from raising Buckie Road not being predicted – including impacts to the garage that require attention. Homes NSW and inland rail reached in principle agreement to start process of exploring options to raise garage floor above the 1 – 100 year flood event. A program for the resolution process to completion of rectification was not available at the time of this audit. • Pearlman Property – It is unclear whether there has been a design prepared for rectification works, however, Consultation Manager records indicate that Inland Rail have requested and received a cost estimate from the property owner to conduct rectification works the property owner deems required, under a compensation release arrangement. A recent Consultation Manager record (14/10/24) indicates the property owner is waiting



Key Issues and Areas of Focus	Assessment and commentary
	<p>on a decision from Inland Rail on the next steps. A program for the decision making / resolution process was not available at the time of this audit.</p>
<p><i>b) The current status of rectification work to Bulldog Creek, Pan Creek and Boggy Creek. The assessment to include, but not be limited to:</i></p> <ul style="list-style-type: none"> - <i>the status of the decision-making process for planning pathways for each creek to facilitate the completion of remediation works;</i> - <i>the status of landholder negotiations and/or property owner agreements for each creek with consideration to property access and easement agreements;</i> - <i>the status of the design development phase, including the extent of each erosion impacts to each impact;</i> - <i>the proposed schedule for completion of all rectification works for each creek; and</i> - <i>a summary of the procurement status of contractors responsible for conducting the rectification work.</i> 	<p>Based on audit interviews and the evidence provided by Inland Rail, it is understood that the rectification works process to Bulldog, Pan and Boggy Creeks will be running concurrently to completion for all creeks, with the current status as follows:</p> <ul style="list-style-type: none"> • Boggy Creek <ul style="list-style-type: none"> ○ Rectification works will be conducted by Inland Rail under CSSI 7474 as a new Construction stage to be added to the current staging report. Revised Staging Report to be provided to the ER for endorsement, and DPHI for approval. ○ Based on Consultation Manager Records provided, consultation/negotiation with property owners in relation to access for construction of design had not commenced. The rectification works program (Gant chart) provided suggests "Owner Negotiation and Approvals" taking place from early/ mid December 2024 to late February 2025. ○ Design of rectification works is now at 100% design and was peer reviewed, with various options provided to Inland Rail for consideration. ○ Procurement has not commenced but will require 12 to 16 weeks, and Inland rail estimates that the rectification process will be completed in Q3 2025. The rectification works program provided forecasts a rectification works completion date in mid to late November 2025. • Pan Creek <ul style="list-style-type: none"> ○ Rectification works will be conducted by Inland Rail under CSSI 7474 as a new Construction stage to be added to the current staging report. Revised Staging Report to be provided to the ER for endorsement, and DPHI for approval. ○ Consultation Manager Records were not provided, however, based on interview sourced information, consultation/negotiations with property owners in relation to access for design construction had not commenced. The rectification works program (Gant chart) provided, suggests "Owner Negotiation and Approvals" taking place from early/ mid December 2024 to late February 2025. ○ Design of rectification works is now at 100% design and was peer reviewed, with various options provided to Inland Rail for consideration. ○ Procurement has not commenced but will require 12 to 16 weeks, and Inland rail estimates that the rectification



Key Issues and Areas of Focus	Assessment and commentary
	<p>process will be completed in Q3 2025. The rectification works program provided forecasts a rectification works completion date in mid to late November 2025.</p> <ul style="list-style-type: none"> • Bulldog Creek <ul style="list-style-type: none"> ○ Rectification works will be conducted by Inland Rail under CSSI 7474 as a new Construction stage to be added to the current staging report. Revised Staging Report to be provided to the ER for endorsement, and DPHI for approval. ○ Consultation Manager Records were not provided, however, based on interview sourced information, consultation/negotiations with property owners in relation to access for design construction had not commenced. The rectification works program (Gant chart) provided, suggests "Owner Negotiation and Approvals" taking place from early/mid December 2024 to late February 2025. ○ Design of rectification works is now at 100% design and was peer reviewed, with various options provided to Inland Rail for consideration. ○ Procurement has not commenced but will require 12 to 16 weeks, and Inland rail estimates that the rectification process will be completed in Q3 2025. The rectification works program provided forecasts a rectification works completion date in mid to late November 2025.

Refer Table 6 of this Audit Report for non-compliances and observations raised.



3.6 Environmental Performance

3.6.1 *Actual vs Predicted Impacts*

Actual Vs Predicted Impacts

A qualitative assessment of actual impacts compared to predicted impacts documented in the Environmental Impact Statement (prepared by GHD Pty Ltd, dated 3 November 2017) for the Project, was conducted as part of this Audit. The EIS provides for an additional 10 trains per day travelling north of Moree (between North Star and Moree) and 12 trains per day travelling south of Moree (between Moree and Narrabri) in 2025 above existing use, with trains configurations including double stacked container trains up to 1800 m long. Operations during the audit period were limited to existing (pre-construction) use consisting of local and regional rail traffic, including grain trains and passenger trains.

As operations during the audit period were limited to existing use, overall predicted impacts were higher than the actual impacts relevant to the development during the audit period.

3.6.2 *Physical extent of the development*

With all construction areas demobilised an assessment of the physical extent of the development in comparison with the approved boundary was not considered to be relevant to the operational performance of the development.

3.6.3 *Incidents and non-compliance*

There were 2 self-reported non-compliances during the audit period (Refer to Table 6 for details), and nil incidents reported under the Approval.

3.6.4 *Complaints*

The complaints register was reviewed and recorded six (6) complaints within the audit period generally related to flooding, with the only exception being a complaint relating to damage to agricultural equipment by a survey marker (Ref: Complaints Register, as of 2 November 2024).

3.6.5 *Compliance*

One (1) Operation Compliance tracking report (OCTR) was prepared during the Audit Period:

- Operation Compliance Report October 2024 CSSI 7474 Narrabri to North Star SP1 Section of Inland Rail, NSW, dated 24 October 2024 – Prepared for the 27 October 2023 to 25 October 2024 period

One (1) non-compliance with CoA A36 was identified within the OCTR, which is also identified in this Audit report.



3.6.6 Adequacy of Operational Environmental Management Framework

Refer Section 3.3 for a high -level assessment of the adequacy and implementation of the OEMF.

Overall Environmental Performance

The environmental performance of the Project during the audit period is considered to be high, noting below:

- The Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to operations that formed a part of this first Operational Independent Audit's Scope.
- The implementation of the OEMF was further assessed on-site - with no non-compliances or observations raised during the site inspections (refer Section 2.2.5 and Appendix E).
- The Auditees were organised and responded promptly to additional information requests during this audit.



4. CONCLUSION

This Audit Report presents the findings from the first Operational Independent Audit of the Inland Rail Narrabri to North Star Project. The temporal period covered by the audit is from the date of commencement of operations (i.e. 27 October 2023) to the date of the audit site inspection on 12 November 2024.

With respect to this first operational Independent Audit Independent Audit:

- **166 conditions** were assessed.
- **Four (4) non-compliances** were identified, two of which had been self-reported by ARTC during the audit period.
- **47 conditions** were considered to be **compliant**.
- **116 conditions** were considered **not triggered**.

In addition to the above, **four (4) observations** were identified.

Overall, the Auditees demonstrated a high level of compliance with the Project Approval and associated post-approval documents relevant to operations that formed a part of this first Operational Audit's Scope. The implementation of these requirements on site was also observed as high.

The Auditors would like to thank the Auditees from ARTC and Inland Rail, for their organisation, cooperation and support during the conduct of this first Operational Independent Audit.



5. LIMITATIONS

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

The matters raised in this report are only those which came to our attention during the course of performing our assessment and are not necessarily a comprehensive statement of all the weaknesses that may exist or improvements that might be made. Our work is performed on a sample basis; we cannot, in practice, examine every activity and procedure, nor can we be a substitute for management's responsibility to maintain adequate controls over all levels of construction/operation and their responsibility to prevent and detect irregularities.

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

This Report does not purport to give legal advice; legal advice can only be given by qualified legal practitioners. To the extent permitted by law, HBI expressly disclaims and excludes liability for any loss, damage, cost or expenses suffered by any fourth party relating to or resulting from the use of, or reliance on, any information contained in this report (including without limitation matters arising from any negligent act or omission of HBI). HBI does not admit that any action, liability or claim may exist or be available to any fourth party. The scope of this audit does not cover a detailed verification of compliance with the conditions of the Deed, nor does it extend to the verification of items assessed by the Independent Certifier prior to issuing of a certificate for any stage.





HBI

Healthy Buildings International

APPENDIX A – SSI 7474 CONDITIONS OF APPROVAL AUDIT TABLE



Item
Project Name: N2NS SP1 Independent Environmental Audit SSI 7474
Auditee/ Client: Australian Rail Track Corporation Limited (ARTC)
Lead Auditor: Swathi Gowda, Healthy Buildings International
Auditor/Audit Team Member: Rui Henriques, Healthy Buildings International
Audit Details: First Operational Independent Audit (IA1)
HBI Project No. 240808 Narrabri to North Star SP1

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
PART A ADMINISTRATIVE CONDITIONS				
GENERAL				
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).	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Site inspection, 12/11/2024 Evidence referred to elsewhere within this Audit Table 	C	As per the findings from this Audit, including any Non-Compliances and Observations raised throughout.
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.	<ul style="list-style-type: none"> Refer evidence throughout this audit table 	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.
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.	<ul style="list-style-type: none"> Interview with ARTC & Inland Rail, 14/11/2024 	NT	Interview with ARTC and Inland Rail confirmed no inconsistencies were identified during the audit period.
A4	The Proponent must comply with the written requirements or directions of the Planning Secretary, including in relation to: (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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 DPHI Compliance informal request for information dated 15/8/24 in relation to "April 2024 Event Flood Review Report, Inland Rail Narrabri to North Star Phase 1", dated July 2024 (RFI-74797716), and ARTC response titled "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval E32 – Flood Review Report Croppa Creek - RFI-74797716", dated 30/8/2024. DPHI Compliance direction dated 30/4/24 in relation to "April 2024 Flood Review Report Croppa Creek" requiring improvements in accordance with Part A, Condition A4 of the Approval to Future Flood Review Reports. DPHI Freight Assessments direction, dated 30/4/24 and titled "Direction made under condition A4 of Inland Rail Narrabri to North Star Phase 1 project (SSI-7474) for management and monitoring of the Five Clawed Worm Skink", and ARTC progress updates/responses titled "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) - Direction made under condition A4 of Inland Rail Narrabri to North Star Phase 1 project (SSI-7474) for management and monitoring of the Five Clawed Worm Skink", dated: 28 May 2024; 1 July 2024; and 1 August 2024 . Site inspection, 12/11/2024 	C	Where applicable during the audit period the proponent complied with the written requirements or directions of the Planning Secretary. Noting that no Flood Review Reports have been prepared since the DPHI Compliance direction dated 30/8/24.
A5	Where the terms of this approval require a document or monitoring program to be prepared or a review to be undertaken in consultation with identified parties, evidence of the consultation undertaken must be submitted to the Planning Secretary with the document. The evidence must include: (a) documentation of the engagement with the party identified in the condition of approval that has occurred before submitting the document for approval; (b) a log of the dates of engagement or attempted engagement with the identified party; (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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 LEWIS Ecological document dated 6 August 2024, and titled "INLAND RAIL – NARRABRI TO NORTH STAR PHASE 1: FIVE-CLAWED WORM SKINK (Anomalopus mackayi) CONSTRUCTION SPECIES MANAGEMENT PLAN (Rev 6)" . 	C	During the audit period The Five-Clawed Worm Skink (<i>Anomalopus Mackayi</i>) Construction Species Management Plan was updated in consultation with the NSW Department of Planning and Environment - Biodiversity, Conservation and Science Directorate.
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. 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. 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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Refer evidence throughout this audit table 	C	As per the findings from this audit, including any Non-Compliances and Observations raised throughout.

Item
Project Name: N2NS SP1 Independent Environmental Audit SSI 7474
Auditee/ Client: Australian Rail Track Corporation Limited (ARTC)
Lead Auditor: Swathi Gowda, Healthy Buildings International
Auditor/Audit Team Member: Rui Henriques, Healthy Buildings International
Audit Details: First Operational Independent Audit (IA1)
HBI Project No. 240808 Narrabri to North Star SP1

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
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.	<ul style="list-style-type: none"> SSI-7474 Approval, dated 13/8/2020 	C	Noted.
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.	Works for the purpose of the CSSI physically commenced on 10 April 2021	NT	Audit relates to Operation of the CSSI.
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).	<ul style="list-style-type: none"> DPHI Letter, "Narrabri to North Star - Operational Audit Auditor Nominations", Ref: SSI-7474-PA-274, dated 5 September 2024, approving the independent audit team. Interview with ER, 4/11/2024 DPIE Independent ER & Alternate ER Appointment Letter, dated 13/10/2020 DPIE Independent Alternate ER Appointment Letter, dated 22/04/2022 	C	DPHI has approved the independent appointment of the ER and the Operational Independent Audit Team.
A10	The Planning Secretary may at any time commission an audit of how an Independent Appointment has exercised their functions. The Proponent must: (a) facilitate and assist the Planning Secretary in any such audit; and (b) make it a term of their engagement of an Independent Appointment that the Independent Appointment facilitate and assist the Planning Secretary in any such audit. The Planning Secretary may dismiss an Independent Appointment should they consider the Independent Appointment has not exercised their functions in accordance with this approval.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Interview with ER, 4/11/2024 	NT	Interview with ARTC and Inland Rail confirmed a DPHI audit of an Independent Appointment is not known to have occurred during the audit period.
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).	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Inland Rail Letter of submission, "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Project Operational Staging Report – Minister's Condition of Approval A11", Ref: 6-0000-260-EEC-DE-LT-0010, dated 12/10/2023, . NARRABRI TO NORTH STAR PHASE 1: OPERATIONAL STAGING REPORT October 2023 DPE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Condition A11", Ref: SSI-7474-24, dated 19/10/2023, approving the above Operational staging Report. 	C	The Operational Staging Report was submitted to DPE (now DPHI) for approval and was approved in a letter dated 19/10/2023. Commencement of operations occurred on 27/10/2023. Operations comprise a return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains rather than Inland Rail operation and associated track capacity increases,
A12	The Staging Report must: (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 (d) set out mechanisms for managing any cumulative impacts arising from the proposed staging.	<ul style="list-style-type: none"> NARRABRI TO NORTH STAR PHASE 1: OPERATIONAL STAGING REPORT October 2023 DPE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Condition A11", Ref: SSI-7474-24, dated 19/10/2023, approving the above Operational staging Report. 	C	DPE (now DPHI) approved the Operational Staging Report in a letter dated 19/10/2023 albeit not agreeing with the characterisation of some conditions with respect to the Operational stage.
A13	The CSSI must be staged in accordance with the Staging Report, as approved by the Secretary.	<ul style="list-style-type: none"> NARRABRI TO NORTH STAR PHASE 1: OPERATIONAL STAGING REPORT, October 2023 	C	The Narrabri to North Star Phase 1 project Operations appears to be staged in accordance with the Operational Staging Report Stage 3 - Operations.
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.	<ul style="list-style-type: none"> NARRABRI TO NORTH STAR PHASE 1: OPERATIONAL STAGING REPORT, October 2023 	C	The Narrabri to North Star Phase 1 Project Operations appears to be staged in accordance with the Operational Staging Report Stage 3 - Operations. Appendix A allocates the applicability of each CoA to each stage of the Project.
A15	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	The Operational Staging Report has not been revised during the Audit Period.

Item
Project Name: N2NS SP1 Independent Environmental Audit SSI 7474
Auditee/ Client: Australian Rail Track Corporation Limited (ARTC)
Lead Auditor: Swathi Gowda, Healthy Buildings International
Auditor/Audit Team Member: Rui Henriques, Healthy Buildings International
Audit Details: First Operational Independent Audit (IA1)
HBI Project No. 240808 Narrabri to North Star SP1

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
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: (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 (c) they have no impacts on heritage items (including areas of archaeological sensitivity), threatened species, populations or ecological communities beyond the impacts approved under the terms of this approval; and (d) the establishment and use of the facility can be carried out and managed within the performance outcomes set out in the terms of this approval, including in relation to environmental impacts.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
SITE ESTABLISHMENT WORKS				
Site Establishment Management Plan				
A17	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 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: (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: (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; and (e) a program for monitoring the performance outcomes, including a program for noise monitoring of site establishment activities. 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. 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Operation of Ancillary Facilities				
A18	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 C4 and relevant Construction Monitoring Programs required by Condition C14 have been approved by the Planning Secretary. This condition does not apply to Condition A21.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Access to Ancillary Facilities				
A19	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
A20	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.

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Minor Ancillary Facilities				
A21	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: (a) are located within the construction boundary; and (b) have been assessed by the ER to have - (i) low amenity impacts to surrounding residences and businesses, after consideration of matters such as compliance with the Interim Construction Noise Guideline (DECC, 2009), traffic and access impacts, dust and odour impacts, and visual (including light spill) impacts, and (ii) low environmental impact with respect to waste management and flooding, and (iii) no impacts on biodiversity, soil and water, and heritage items beyond those already approved under other terms of this approval.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Boundary Screening				
A22	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
A23	Boundary screening required under Condition A22 of this approval must minimise visual, noise and air quality impacts on adjacent sensitive receivers.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
ENVIRONMENT REPRESENTATIVE				
A24	Works must not commence until an ER has been approved by the Planning Secretary and engaged by the Proponent.	<ul style="list-style-type: none"> Interview with ER, 4/11/2024 DPIE Independent ER & Alternate ER Appointment Letter, dated 13/10/2020 DPIE Independent Alternate ER Appointment Letter, dated 22/04/2022 	C	DPIE (Now DPHI) Independent ER & Alternate ER Appointment Letter, dated 13/10/2020 approved Mr Steve Fermio, the current Environmental representative.
A25	The Planning Secretary's approval of an ER must be sought no later than one (1) month before the commencement of works.	<ul style="list-style-type: none"> Interview with ER, 4/11/2024 Interview with Auditees, 14/11/2024 	NT	Interview with ARTC and Inland Rail confirmed during the Audit period Inland Rail / ARTC did not seek the Planning Secretary's approval of an ER.
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).	<ul style="list-style-type: none"> Interview with ER, 4/11/2024 Interview with Auditees, 14/11/2024 DPIE Independent ER & Alternate ER Appointment Letter, dated 13/10/2020 DPIE Independent Alternate ER Appointment Letter, dated 22/04/2022 	NT	Interview with ARTC and Inland Rail confirmed during the Audit period Inland Rail / ARTC did not seek the Planning Secretary's approval of an additional ER.
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.	<ul style="list-style-type: none"> Interview with ER, 4/11/2024 Interview with Auditees, 14/11/2024 DPIE Independent ER & Alternate ER Appointment Letter, dated 13/10/2020 DPIE Independent Alternate ER Appointment Letter, dated 22/04/2022 ER Monthly report to DPHI for the Audit Period (Refer Condition A28 below) 	C	DPIE (Now DPHI) Independent ER & Alternate ER Appointment Letter, dated 13/10/2020 approved Mr Steve Fermio and Mr Derek Low as ERs for the Project, who continued to be engaged by the Proponent, and exercised the ER functions, throughout the Audit Period.

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NC	Non compliant
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Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
A28	For the duration of the works until 12 months after the completion of construction, the approved ER must: (a) receive and respond to communication from the Planning Secretary in relation to the environmental performance of the CSSI; (b) consider and inform the Planning Secretary on matters specified in the terms of this approval; (c) consider and recommend to the Proponent any improvements that may be made to work practices to avoid or minimise adverse impact to the environment and to the community; (d) review documents identified in Conditions 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: (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 amendment. This does not include any modifications to the terms of this approval; and (j) 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.	<ul style="list-style-type: none"> Interview with ER, 4/11/2024 Interview with Auditees, 14/11/2024 <p>ER Inspection Reports - samples:</p> <ul style="list-style-type: none"> Environmental Representative's Inspection Report 30 April 2024 Environmental Representative's Inspection Report 27 August 2024 <p>ER Monthly Reports to DPHI:</p> <ul style="list-style-type: none"> Inland Rail N2NS – SSI 7474 – ER Monthly Report – November 2023 (WolfPeak Pty Ltd, 7/12/2023) Inland Rail N2NS – SSI 7474 – ER Monthly Report – December 2023 (WolfPeak Pty Ltd, 12/01/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – January 2024 (WolfPeak Pty Ltd, 7/02/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – February 2024 (WolfPeak Pty Ltd, 7/03/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – March 2024 (WolfPeak Pty Ltd, 5/04/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – April 2024 (WolfPeak Pty Ltd, 3/05/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – May 2024 (WolfPeak Pty Ltd, 7/06/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – June 2024 (WolfPeak Pty Ltd, 5/07/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – July 2024 (WolfPeak Pty Ltd, 7/08/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – August 2024 (WolfPeak Pty Ltd, 6/09/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report –September 2024 (WolfPeak Pty Ltd, 9/10/2024) Inland Rail N2NS – SSI 7474 – ER Monthly Report – October 2024 (WolfPeak Pty Ltd, 7/11/2024) <p>ER review of documents identified in Conditions A10, A17, C1, C4 and C11: - Nil</p>	NC	<p>Interview with ER (4/11 2024) with evidence reviewed and summarised as follows, for the audit period:</p> <ul style="list-style-type: none"> ER has received no communication to respond to or requests from DPHI under A28 a), f) or g); ER Inspections undertaken typically on 30 April 2024 and 27 August 2024 with issues and Opportunities for Improvement (OFIs) raised by the ER. Close out by Inland Rail was documented/tracked within the inspection reports. Issues/OFIs raised by the ER were predominantly in relation to significant channel erosion downstream of culverts in private property at Boggy Creek, Pan Creek and Bulldog Creek, with some OFIs raised in relation to Five Clawed Worm Skink monitoring sites. <p>During the audit period, the following self-reported non-compliance was notified to DPHI:</p> <ul style="list-style-type: none"> IOA1 – NC01 recorded against CoA A28(j) on 6 November 2024: The ER monthly report for September 2024 was submitted on 9 October rather than on the 7 October, with no extension sought from the Planning Secretary. this non-compliance was also reported in the ER Monthly Report for October 2024 (Section 3.5), where the ER indicated that "as the 7 October was a Monday public holiday in NSW this only allowed only 4 working days to prepare the report, which would then have to have been submitted on the previous Friday, the 4 October". It is recommended that the ER seek an extension under Condition A6 of submission of future ER monthly reports when a minimum of 5 business days are not available following the end of each month to prepare the respective ER monthly report. <p>This Audit identified the following non-compliance:</p> <ul style="list-style-type: none"> IOA1 – NC02 recorded against CoA A28(d) i) - CoA A28(d) requires that the approved ER must review documents identified in Condition A11 (Staging Report) to ensure they are consistent with requirements in or under the Approval and if so: (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). The Narrabri To North Star Phase 1: Operational Staging Report, October 2023 was submitted to the Planning Secretary for approval in accordance with Coa A11, however, evidence of ER endorsement of the document was not available to the Audit. It is recommended that Inland Rail / ARTC seek ER endorsement of any future Staging Reports.
A29	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: (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).	<ul style="list-style-type: none"> Interview with ER, 4/11/2024 Interview with Auditees, 14/11/2024 <ul style="list-style-type: none"> ER (Wolfpeak Pty Ltd) letter titled "Inland Rail: Narrabri to North Star Project (SSI-7474), CoA A29 - change to monthly complaints reports", dated 9/11/2023. ER (Wolfpeak Pty Ltd) emails requesting information inputs for the ER Monthly Report dated: 2/5/2024, 3/6/2024, 2/7/2024, 30/7/2024, 2/9/2024 and 30/10/2024, "Inland Rail: Narrabri to North Star Project (SSI-7474), CoA A29 - change to monthly complaints reports", dated 9/11/2024. ER Monthly Reports to DPHI listed in CoA 28 above. 	C	<p>The ER advised all required information has been provided to them by the Proponent in order for them to undertake their duties during the audit period, as applicable.</p> <p>In relation to this CoA:</p> <p>a) Inland Rail provides the ER a copy of the Complaints Register monthly as varied by the ER letter request of 9/11/2023 and as per the ER monthly request for input information for the ER monthly Reports</p> <p>b) No Consistency Assessments prepared/provided during this Audit Period (also nil noted within ER Monthly Reports sighted as evidence during this Audit).</p>
A30	The Planning Secretary may at any time commission an audit of an ER's exercise of its functions under Condition A28. The Proponent must: (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. Note: The Planning Secretary may dismiss the ER should they consider the ER has not exercised their functions in accordance with this approval.	<ul style="list-style-type: none"> Interview with ER, 4/11/2024 Interview with Auditees, 14/11/2024 	NT	<p>Interview with ARTC and Inland Rail confirmed the Planning Secretary did not commission an audit of an ER's exercise of its functions under Condition A28.</p>

Item
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Result	Comment
NC	Non compliant
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
COMPLIANCE REPORTING REQUIREMENTS				
A31	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).	<ul style="list-style-type: none"> Operations Compliance Report - October 2024 SSI 7474 – Inland Rail Narrabri to North Star SP1 Project, Revision D, dated 24/10/2024 ARTC letter titled "October 2024 Operation Compliance Report for SSI 7474 – Inland Rail Narrabri to North Star SP1 Project", dated 24/10/2024. 	C	An Operation Compliance Report was carried out for the initial 52 weeks of Operation in accordance with the Compliance Reporting Requirements outlined in the Compliance Reporting Post Approval Requirements (2020).
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.	<ul style="list-style-type: none"> Major Projects Portal Post Approval Form 20241024220550 - Narrabri to North Star - SSI-7474-PA-279 Major Projects Portal email dated 25/10/2024, titled "Inland Rail - Narrabri to North Star Phase 1 - Post Approval Document Received - (SSI-7474-PA-279)" 	C	The Operation Compliance Report for the initial 52 weeks of Operation (27/10/2023 to 24/10/2024) was submitted to the Department via the Major Projects portal no later than 52 weeks from the date of commencement of operation as set out in the Compliance Reporting Post Approval Requirements (2020).
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Project Website - https://inlandrail.com.au/narrabri-to-north-star-phase-1-operational-compliance-report-2024/ 	C	The Compliance Report was made publicly available less on the Project website less than 60 days after submission to the Planning Secretary
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Interview with ARTC and Inland Rail confirmed there was no request to the Planning Secretary during the Audit Period for ongoing annual operational compliance reports to be ceased.
AUDITING				
A35	Proposed independent auditors must be agreed to in writing by the Planning Secretary prior to the commencement of an Independent Audit.	<ul style="list-style-type: none"> DPHI Letter, "Narrabri to North Star - Operational Audit Auditor Nominations", Ref: SSI-7474-PA-274, dated 5 September 2024, approving the Operational Independent Audit Team. Email and Letter, HBI Lead Auditor to DPHI (25 September 2024) Email, DPHI to HBI lead Auditor (9 October 2024) 	C	<p>DPHI endorsed the independent appointment of the following Operational Independent Audit Team on 5 September 2024:</p> <ul style="list-style-type: none"> Swathi Gowda as Lead Auditor; and Rui Henriques as Auditor / Audit Team Member <p>DPHI's correspondence noted that the Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the Independent Audit Post Approval Requirements (2020).</p> <p>Scope consultation correspondence was sent to DPHI by the Lead Auditor on 25 September 2024 and DPHI responded on 9 October 2024.</p> <p>To meet the Audit Schedule and Delivery timeframes:</p> <ul style="list-style-type: none"> The site inspection of Narrabri to North Star Stage and this initial Operational Independent Audit commenced on 12 November 2024.
A36	Independent Audits of the development must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (2020).	This initial Operational Independent Audit [Report Name: Operational Independent Audit No.1 (IA1) Audit Report Narrabri to North Star -SSI 7474)	NC	<p>The Independent Audit Post Approval Requirements (2020) require that the initial Operation Audits be conducted within 26 weeks of commencement of operation, which in the case of this audit would be prior to 26 April 2024 and submitted within 2 (two) months of the audit occurring.</p> <p>During the audit period, the following self-reported non-compliance was notified to DPHI:</p> <ul style="list-style-type: none"> IOA1 – NC03 recorded against CoA A36 on 8 August 2024: The initial Operational Independent Audit (this Audit) was not conducted within 26 weeks of commencement of operation.
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	<p>Interview with ARTC and Inland Rail confirmed no such requests have been received from DPHI within this audit period.</p> <p>Requirements of this CoA have not been triggered yet.</p>
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	<p>Interview with ARTC and Inland Rail confirmed no Independent Audits were conducted within this audit period.</p> <p>Requirements of this CoA have not been triggered this Audit Period.</p>

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NC	Non compliant
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	<p>Interview with ARTC and Inland Rail confirmed no Independent Audits were conducted within this audit period.</p> <p>Requirements of this CoA have not been triggered tis Audit Period.</p>
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	<p>Interview with ARTC and Inland Rail confirmed there was no request to the Planning Secretary during the Audit Period for ongoing independent operational audits to be ceased.</p> <p>Requirements of this CoA have not been triggered yet.</p>
INCIDENT NOTIFICATION AND REPORTING				
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.</p> <p>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>	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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).	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Narrabri to North Star Phase 1 Communication Strategy 50000-260-PCS-00-ST-0001_D (Revision 2), dated 20/01/2021. DPIE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Conditions B1-B5 – Approval of Communication Strategy", Ref: SSI-7474, undated (received 23/12/20 based on interviews with Auditees) 	NT	Interview with ARTC and Inland Rail confirmed there were no changes to the approved document during the audit period.
B2	<p>The Communication Strategy must:</p> <p>(a) identify people, organisations and government authorities to be consulted during works;</p> <p>(b) set out procedures and mechanisms for the regular distribution of accessible information about or relevant to the CSSI;</p> <p>(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;</p> <p>(d) consider opportunities for the community to visit construction sites (taking into consideration workplace, health and safety requirements);</p> <p>(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;</p> <p>(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;</p> <p>(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;</p> <p>(h) set out procedures and mechanisms:</p> <p>(i) through which the community can discuss or provide feedback to the Proponent;</p> <p>(ii) through which the Proponent will respond to enquiries or feedback from the community; and</p> <p>(iii) 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>	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Narrabri to North Star Phase 1 Communication Strategy 50000-260-PCS-00-ST-0001_D (Revision 2), dated 20/01/2021. DPIE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Conditions B1-B5 – Approval of Communication Strategy", Ref: SSI-7474, undated (received 23/12/20 based on interviews with Auditees) 	NT	<p>The approved Communications Strategy continued to be implemented throughout the Audit Period with no amendments.</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>Section 8.3 (Table 8) Outlines how 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>Sections 8 and 9 outline 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>
B3	The Communication Strategy must be submitted to the Secretary for approval no later than one (1) month before the commencement of any work.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 DPIE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Conditions B1-B5 – Approval of Communication Strategy", Ref: SSI-7474, undated (received 23/12/20 based on interviews with Auditees) 	NT	The Communication Strategy was submitted to the Planning Secretary on 2 November 2020. Works for the purpose of the CSSI physically commenced on 10 April 2021

Item
Project Name: N2NS SP1 Independent Environmental Audit SSI 7474
Auditee/ Client: Australian Rail Track Corporation Limited (ARTC)
Lead Auditor: Swathi Gowda, Healthy Buildings International
Auditor/Audit Team Member: Rui Henriques, Healthy Buildings International
Audit Details: First Operational Independent Audit (IA1)
HBI Project No. 240808 Narrabri to North Star SP1

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B4	Work for the purposes of the CSSI must not commence until the Communication Strategy has been approved by the Secretary.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 DPIE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Conditions B1-B5 – Approval of Communication Strategy", Ref: SSI-7474, undated (received 23/12/20 based on interviews with Auditees) 	NT	The Communication Strategy was approved by Planning Secretary on 23 December 2020. Works for the purpose of the CSSI physically commenced on 10 April 2021
B5	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.	Inland Rail N2ns Independent Environmental Audit 5 -Construction, 22 September 2023	C	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023. However, the condition has been deemed applicable given the six months following Construction fall within the Audit Period. The Communication Strategy (revision 2, dated 20 January 2021) was approved by DPIE (now DPHI). Implementation was assessed through interviews with ARTC/ Inland rail staff and review of the Complaints Register.
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Section 8 of Operational Environmental Management Framework (OEMF) Complaints Register - 13 October 2023 to 25 October 2024 	C	A complaints register is maintained by the project consistent with Section 8 of the OEMF.
B7	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: (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. This information must be accessible to all in the community regardless of age, ethnicity, disability or literacy level.	<ul style="list-style-type: none"> Project website https://inlandrail.com.au/n2ns-p1-understanding-operations-fact-sheet/ Interview with Auditees, 14/11/2024 Narrabri to North Star Phase 1 Communication Strategy 50000-260-PCS-00-ST-0001_D (Revision 2), dated 20/01/2021. 	C	Project website provides: <ul style="list-style-type: none"> 24Hr telephone number - Inland Rail 1800 732 761 24Hr telephone number - ARTC Enviroline 1300 550 402 (operational rail corridor) Physical address : 64 -68 Balo Street Moree NSW 2400 Email address: inlandrailnsw@artc.com.au Email address: enviroline@artc.com.au A mediation system for complaints is outlined in Section 9.9 of the Narrabri to North Star Phase 1 Communication Strategy
B8	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 N2NS Phase 1 Rail Safety Campaign Strategy - End of major construction & stage 3 reopening, 2023 Revision V5, dated 9 August 2023 Narrabri to North Star Phase 1 Understanding Operations - Website factsheet Last Project Update : Narrabri to North Star Phase 1 (December 2023) - Newsletter Penultimate Project Update : Narrabri to North Star Phase 1 Trains now running to North Star; major construction done! (October 2023) - Newsletter Rural Press Pty Ltd (Moree Champion newspaper) Invoice No 7368106, dated 7/12/23 The North Western Courier Pty Ltd (The Courier newspaper) receipt, dated 9/1/24 and email dated 9/1/2024 	C	The N2NS Phase 1 Rail Safety Campaign Strategy was prepared with objectives to: <ul style="list-style-type: none"> Inform the community that the rail line from Moree to North Star would become operational from late August / early September 2023 Educate the community on safety around level crossings Outline what the community can expect once the rail line is operational Ensure impacted stakeholders (e.g., schools, local businesses and workers, stage 3 alignment residents and regional road users) are aware of the track being operational and provide information on level crossing safety. Ensure the campaign is activated in time for the start of the busy 2023 grain harvest season. The above objectives were to be achieved through a variety of media and other community engagement/information activities including: <ul style="list-style-type: none"> Local printed / digital mastheads and radio Geotargeted social media Webpage update Newsletters Hosting an experience on the rail line (hi rail bus tour) for local schools The details required were circulated as part of an insert in the Moree Champion and North Western Courier (The Courier) local newspapers.

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Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
B9	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: (a) number of complaints received; (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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Complaints Register - 13 October 2023 to 25 October 2024 	C	<p>A complaints register is maintained by the project consistent with Section 8 of the OEMF and this Condition of approval.</p> <p>The complaints register includes the number of complaints received, the number of people affected, and the response in relation to each complaint. A total of 6 complaints were received during the audit period. Three (3) complaints remain open.</p>
B10	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Interview with ARTC and Inland Rail confirmed there were no requests from the Planning Secretary during the audit period.
PROVISION OF ELECTRONIC INFORMATION				
B11	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: (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 (f) 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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 website: https://inlandrail.com.au/where-we-go/projects/narrabri-to-north-star/ 	C	The up-to-date information required to be published and maintained on the website or dedicated pages was viewed on the website.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.

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Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations																					
C2	<p>The CEMP must provide:</p> <p>(a) a description of activities to be undertaken during construction (including the scheduling of construction);</p> <p>(b) details of environmental policies, guidelines and principles to be followed in the construction of the SSI;</p> <p>(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;</p> <p>(d) details of how the activities described in subsection (a) of this condition will be carried out to:</p> <p>(i) meet the performance outcomes stated in the documents listed in Condition A1; and</p> <p>(ii) manage the risks identified in the risk analysis undertaken in subsection (d) of this condition;</p> <p>(e) an inspection program detailing the activities to be inspected and frequency of inspections;</p> <p>(f) a protocol for managing and reporting any:</p> <p>(i) incidents; and</p> <p>(ii) non-compliances with this approval or statutory requirements;</p> <p>(g) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction;</p> <p>(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;</p> <p>(i) a description of the roles and environmental responsibilities for relevant employees and their relationship with the ER;</p> <p>(j) for training and induction for employees, including contractors and sub-contractors, in relation to 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>	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.																					
C3	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.																					
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="252 1276 1157 1528"> <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>TfNSW 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	TfNSW 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	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
	Required CEMP Sub-plan	Relevant government authorities to be consulted for each CEMP Sub-plan																							
(a)	Traffic, transport and access	TfNSW 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																							
C5	<p>The CEMP Sub-plans listed in Condition C4 must state how:</p> <p>(a) the environmental performance outcomes identified in the documents listed in Condition A1, as modified by these conditions, will be achieved;</p> <p>(b) the mitigation measures identified in the documents listed in Condition A1, as modified by these conditions will be implemented;</p> <p>(c) the relevant terms of this approval will be complied with; and</p> <p>(d) 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>	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.																					

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Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
C6	The CEMP Sub-plans must be developed in consultation with relevant parties identified in Condition C4. 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
C7	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
C8	The Traffic and Transport Management Sub-plan must be consistent with agreements with Councils about the use of local roads and include: (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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
C9	The Biodiversity Management Sub-plan must include: (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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
C10	The Soil and Water Management Sub-plan must include: (a) a draft water balance for the project; (b) information demonstrating that the required construction water resources are legally and physically available; and (c) mitigation measures to address construction water resource shortages that arise.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
C11	The Heritage Management Sub-plan must include: (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; (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 (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. The Proponent must consult with the Registered Aboriginal Parties in the development of the Sub-plan with respect to Aboriginal objects. 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.

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NC	Non compliant
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations															
C12	The Flood Emergency Management Sub-plan must include measures for managing flood risks during construction and address flood recovery.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															
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"> <thead> <tr> <th></th> <th>Required Construction Monitoring Programs</th> <th>Relevant government authorities to be consulted for each Construction Monitoring Program</th> </tr> </thead> <tbody> <tr> <td>(a)</td> <td>Noise and vibration</td> <td>Nil</td> </tr> <tr> <td>(b)</td> <td>Water usage</td> <td>Water Group</td> </tr> <tr> <td>(c)</td> <td>Air Quality</td> <td>Nil</td> </tr> <tr> <td>(d)</td> <td>Physical condition of local roads</td> <td>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	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
	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	Each Construction Monitoring Program must provide: (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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															
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 applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															
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 applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															
C20	<p>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.</p> <p>Note: Where a relevant CEMP Sub-plan exists, the relevant Construction Monitoring Program may be incorporated into that CEMP Sub-plan.</p>	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.															

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Auditor/Audit Team Member: Rui Henriques, Healthy Buildings International
Audit Details: First Operational Independent Audit (IA1)
HBI Project No. 240808 Narrabri to North Star SP1

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
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.	<ul style="list-style-type: none"> EHS-PR-001 – Operational Environmental Management Framework (OEMF), Version 1.4, dated February 2024. ARTC letter titled "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval", dated 3/05/2024. DPE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Condition A11", Ref: SSI-7474-194, dated 19/10/2022 Inland Rail and DPE email trail, "N2NSP1 Staging Report Update", Ref: SSI-7474-194, dated 1/11/2022 to 22/11/2022 Interview with Auditees, 14/11/2024 	NT	Condition D2 Applies
D2	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: (a) the performance outcomes, commitments and mitigation measures, made and identified in the documents listed in Condition A1, and terms of this approval can be achieved; (b) issues identified through ongoing risk analysis can be managed; and (c) procedures are in place for rectifying any non-compliance with this approval identified during compliance auditing, incident management or any other time during operation.	<ul style="list-style-type: none"> EHS-PR-001 – Operational Environmental Management Framework (OEMF), Version 1.4, dated February 2024. ARTC letter titled "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval", dated 3/05/2024. DPE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Condition A11", Ref: SSI-7474-194, dated 19/10/2022 Inland Rail and DPE email trail, "N2NSP1 Staging Report Update", Ref: SSI-7474-194, dated 1/11/2022 to 22/11/2022 Interview with Auditees, 14/11/2024 	C	The ARTC Interstate Environmental Management Framework (IEMF) was initially provided to the Secretary on 21/11/22 while it was updated to address the inclusion Narrabri to North Star, Phase 1 operation and attendant requirements of the Approval (SSI-7474). EHS-PR-001 – Operational Environmental Management Framework (OEMF), Version 1.4, dated February 2024 was submitted to the Secretary on 3 May 2024. • IOA1 – OFI01 While the correspondence provided appear to provide evidence of ongoing acknowledgment by the Secretary of the OEMF without requirement for alteration and, therefore, appears to provide evidence of tacit written satisfaction of the Secretary, it does not ultimately provide evidence "of the written satisfaction of the Secretary, that through the" OEMF (a) (b) and (c) of this CoA are met. It is recommended that ARTC seek the written satisfaction of the Secretary that (a) (b) and (c) of this CoA are met through the OEMF as required by the Condition.
D3	The performance measures and mitigation measures detailed in the OEMP must address the maintenance of culverts with respect to blockages, siltation and scouring.	EHS-PR-001 – Operational Environmental Management Framework (OEMF), Version 1.4, dated February 2024.	C	Appendix A - Structures Inspections (ETE-09-01) and Appendix B - Structures Inspections Procedure (ETE-09-02) address the maintenance of various water crossing / drainage structures with respect to blockages, siltation and scouring.
D4	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.	<ul style="list-style-type: none"> EHS-PR-001 – Operational Environmental Management Framework (OEMF), Version 1.4, dated February 2024. ARTC letter titled "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval", dated 3/05/2024. DPE Letter, "Narrabri to North Star Phase 1 (SSI-7474) Condition A11", Ref: SSI-7474-194, dated 19/10/2022 Inland Rail and DPE email trail, "N2NSP1 Staging Report Update", Ref: SSI-7474-194, dated 1/11/2022 to 22/11/2022 Interview with Auditees, 14/11/2024 	C	The ARTC Interstate Environmental Management Framework (IEMF), the precursor to the OEMF, was initially provided to the Secretary on 21/11/22 . Commencement of operations comprising return to pre-existing use by local and regional rail traffic, including grain trains and passenger trains rather than Inland Rail operation and associated track capacity increases, occurred on 27/10/2023

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Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
PART E KEY ISSUE CONDITIONS				
NOISE AND VIBRATION				
Work Hours				
E1	Works must be undertaken during the following hours: (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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E2	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Variation to Work Hours				
E3	Notwithstanding Conditions E1 and E2, works associated with the CSSI may be undertaken outside the hours specified under those conditions in the following circumstances: (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 (c) where different construction hours are permitted under an EPL in force in respect of the CSSI; or (d) work approved under an Out-of-Hours Work Protocol for work not subject to an EPL as required by Condition E8; or (e) where a negotiated agreement is in force, in accordance with Condition E4 and E5; or (f) construction that causes LAeq(15 minute) noise levels: 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 iv) 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).	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E5	All negotiated agreements must be in writing and finalised before the commencement of works.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E6	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Highly Noise Intensive Work				
E7	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: (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. 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.

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NC	Non compliant
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Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
Out-of-Hours Work Protocol – Work not subject to an EPL				
E8	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: (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: (i) low risk activities can be approved by the ER, and (ii) high risk activities that are approved by the Planning Secretary; and (e) identify Department, EPA and community notification arrangements for approved out-of- hours works, which maybe detailed in the Communication Strategy.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E9	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Noise and Vibration Mitigation				
E10	Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria: (a) construction 'Noise affected' noise management levels established using the Interim Construction Noise Guideline (DECC, 2009); (b) 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). 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 C4. 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E11	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 C4.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E12	This approval does not permit blasting.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.

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Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
Noise Mitigation – Operational Noise Mitigation Measures				
E13	<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 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>	<ul style="list-style-type: none"> • "Narrabri to North Star Operational Noise and Vibration Review for Phase 1", March 2022 Rev H, dated 18/03/2022. • ARTC "Complaints and Enquiries Management Procedure", Version 1.0 dated May 2024. • DPE Letter, "Narrabri to North Star (SSI 7474) Conditions E13 – Operational Noise and Vibration Review", Ref: SSI-7474-194, dated 19/10/2022 • Interview with Auditees, 14/11/2024 	C	<p>DPE (now DPHI) approved the Operational Noise and Vibration Review in a letter dated 19/10/2022.</p> <p>Operational noise and vibration complaints are to be managed in accordance with the ARTC Complaints and Enquiries Management Procedure.</p>
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> <p>(a) within six (6) months of the commencement of construction affecting the impacted receiver/s;</p> <p>(b) in the case of at-property treatments, as agreed with the landowner; or</p> <p>(c) as agreed by the Planning Secretary.</p>	<ul style="list-style-type: none"> • Inland Rail letter titled "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Project Operational Noise Mitigation Measures – At Property Architectural Treatments, Progress Update Minister's Conditions of Approval E14 and E15", ARTC REF# 6-0000-260-EEC-00-LT-0315, dated 29/08/2024. • Interview with Auditees, 14/11/2024 <p><u>Signed agreements with eligible receivers - samples:</u></p> <ul style="list-style-type: none"> • Small Works Agreement (NSW Residential) Noise Attenuation Works for RX0835 62 Railway Parade, Bellata NSW 2397, executed 24 October 2024 • Small Works Agreement (NSW Residential) Noise Attenuation Works for RX2356 15 Edward Street, North Star NSW 2408, executed 20 November 2024 • Small Works Agreement (NSW Residential) Noise Attenuation Works for RX2300 Tooramanda, 195 Buckie Road Croppa Creek NSW 2411, executed 5 November 2024 	C	<p>Operational noise mitigation measures identified in the approved ONVR (Condition E13) consist exclusively of at-property architectural treatments at 39 eligible receivers</p> <p>The Inland Rail letter dated 29/8/2024 to Planning Secretary provides an update of at-property architectural treatments implementation progress as follows:</p> <ul style="list-style-type: none"> • Signed agreement has been reached with all eligible receivers (39 in total); • A suitably experienced and competent building contractor - PKN Constructions Pty Ltd (PKN) has now been engaged by IRPL to deliver the agreed building scopes; and • Subject to access and owner agreement, building works are expected to be complete by 30 June 2025. <p>Signed agreements between Inland Rail, PKN Constructions and property owners were viewed, which confirm the implementation progress information provided in the Inland Rail letter dated 29/8/2024.</p>

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NC	Non compliant
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
E15	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	<ul style="list-style-type: none"> Inland Rail letter titled "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Project Operational Noise Mitigation Measures – At Property Architectural Treatments, Progress Update Minister's Conditions of Approval E14 and E15", ARTC REF# 6-0000-260-EEC-00-LT-0315, dated 29/08/2024. Interview with Auditees, 14/11/2024 <p>Signed agreements with eligible receivers - samples:</p> <ul style="list-style-type: none"> Small Works Agreement (NSW Residential) Noise Attenuation Works for RX0835 62 Railway Parade, Bellata NSW 2397, executed 24 October 2024 Small Works Agreement (NSW Residential) Noise Attenuation Works for RX2356 15 Edward Street, North Star NSW 2408, executed 20 November 2024 Small Works Agreement (NSW Residential) Noise Attenuation Works for RX2300 Tooramanda, 195 Buckie Road Croppa Creek NSW 2411, executed 5 November 2024 	NT	Implementation of operational noise mitigation measures proposed are in accordance with Conditions E13 and E14
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> <p>(a) noise monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under Condition E13;</p> <p>(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;</p> <p>(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;</p> <p>(d) any required recalibrations of the noise model taking into consideration factors such as noise monitoring and actual train movements;</p> <p>(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</p> <p>(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> <p>The ONCR is to be verified by a suitably qualified and experienced noise and vibration expert. The ONCR must be submitted to the Secretary and the EPA for information within 90 days of completing the operational noise monitoring.</p> <p>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.</p>	<ul style="list-style-type: none"> DPHI Letter, "Narrabri to North Star, Phase 1 (CSSI-7474) Time Extension Request Level Crossing Performance Report (E46) and Operational Noise Compliance Report (E16)", Ref: SSI-7474-265, dated 20/08/2024 Interview with Auditees, 14/11/2024 	NT	DPHI Letter Ref: SSI-7474-265, dated 20/08/2024, grants a 2 year extension under Condition A6 for the submission of the Operational Noise Compliance Report required by condition E16.

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BIODIVERSITY

E17	<p>The Proponent must minimise impacts to plant community types and not exceed the total areas impacted as identified in Table E1.</p> <p>Table E1: Native Vegetation Impacted</p> <table border="1"> <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 gilgaled clay from Pilliga Scrub to Goondiwindi, Brigalow Belt South Bioregion</td> <td>Brigalow (Acacia harpophylla dominant and codominant) – 16.13</td> <td>17.31</td> </tr> <tr> <td>Zone 3 - PCT39 (BR130, NA129) Coolabah – River Coolabah - 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 – 1.74</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>Natural Grasslands on Basalt and Fine-textured Alluvial Plains of Northern NSW and Southern Qld – 432.07</td> <td>432.07</td> </tr> <tr> <td>Zone 5 - PCT56 (BR186, NA182) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW</td> <td>Not listed</td> <td>143.95</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>249.85</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>0.51</td> </tr> <tr> <td>Zone 8 - 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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> <p>(a) acquiring and retiring "biodiversity credits" within the meaning of the Biodiversity Conservation Act 2016; and/or</p> <p>(b) making a payment into the Biodiversity Conservation Fund; and/or</p> <p>(c) outlining in a Biodiversity Offset Strategy the provision of supplementary measures. The Strategy must be prepared in consultation with EES and DAWE.</p> <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"> <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 gilgaled clay from Pilliga Scrub to Goondiwindi, Brigalow Belt South Bioregion</td> <td>Brigalow (Acacia harpophylla dominant and codominant)</td> <td>1223</td> </tr> <tr> <td>Zone 3 - 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DPHI Letter, "Narrabri to North Star, Phase 1 (CSSI-7474) Condition E18: Biodiversity Offset Retirement Time Extension", Ref: SSI-7474-277, dated 10/10/2024 Interview with Auditees, 14/11/2024 	NT	DPHI Letter Ref: SSI-7474-277, dated 10/10/2024, grants an extension under Condition A6 to 13 February 2025 to meet the requirements of Condition E18.
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Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations														
	<p>Notes:</p> <p>1. Credits have been calculated using the Framework for Biodiversity Assessment.</p> <p>2. 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 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"> <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			
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E19	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.	<ul style="list-style-type: none"> DPHI Letter, "Narrabri to North Star, Phase 1 (CSSI-7474) Condition E19: Biodiversity Assessment Report update", Ref: SSI-7474-277, dated 2/10/2024 Interview with Auditees, 14/11/2024 	C	The previously approved Biodiversity Assessment Report (BDAR) contained an error in the credit amounts for PCT 135 and PCT 413. The approved revised BDAR (DPHI Letter dated 2/10/2024) updates the ecosystem and species credit requirements accordingly.														
E20	The review and update of credit requirements must be undertaken by: <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. 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>	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.														
E21	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.														
Re-use of Timber																		
E22	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.														

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Koala Habitat																				
E23	<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 gilgaied clay from Pilliga Scrub to Goondiwindi, 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) Poplar 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) Poplar 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 gilgaied clay from Pilliga Scrub to Goondiwindi, 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) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	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)	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	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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Zone 2 - PCT35 (BR120, NA117) Brigalow – Belah open forest / woodland on alluvial often gilgaied clay from Pilliga Scrub to Goondiwindi, 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) Poplar Box - Belah woodland on clay-loam soils on alluvial plains of north-central NSW	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)	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	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.																
E25	The Proponent must provide a minimum of 4556 species credits to offset impacts to the koala.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.																
E26	The offset credits required by Condition E25 must be sourced where practicable, from: (a) The same IBRA subregion as the impacted site, or (b) The adjoining IBRA subregions within the same IBRA region as identified in (a).	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.																

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Audit Details: First Operational Independent Audit (IA1)
HBI Project No. 240808 Narrabri to North Star SP1

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
FLOODING				
Quantitative Design Limits (QDLs)				
E27	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. 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: (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: i) the non-compliance; or ii) establish an alternative level of mitigation of impacts for that location through alternative design measures; (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;	<ul style="list-style-type: none"> "Narrabri to North Star Flood Design Verification Report for Phase 1 Issued For Construction", July 2022 Rev 0, dated 5/07/2022. DPE Letter, "Flood Design Verification Report for Narrabri to North Star (Condition E28 of SSI 7474)", Ref: SSI-7474-176, dated 3/08/2022 Interview with Auditees, 14/11/2024 	C	The Flood Design Verification Report demonstrating compliance with the QDLs as required by Condition E28 was approved by DPE (now DPHI) on 3/08/2022. Compliance with the Quantitative Design Limits is outlined in Section 5.3 of the Flood Design Verification Report
Flood Design Verification Report				
E28	Compliance with the QDLs as required by Condition E27 must be demonstrated in a Flood Design Verification Report that details flood behaviour under existing conditions and with the final detailed design of the approved CSSI. The flood modelling informing the report must be developed in consultation with EES, relevant councils and Transport for NSW, and completed to the specifications in Appendix A – FLOODING QUANTITATIVE DESIGN LIMITS AND MODELLING REQUIREMENTS. The Flood Design Verification Report must include: (a) details of the flood modelling that informs the report; (b) details of how the project's flood planning level (FPL) was decided, with reference to relevant considerations of the NSW Floodplain Development Manual; (c) an assessment of the infrastructure's compliance with the Quantitative Design Limits (QDLs) for flooding, hydrology and geomorphology listed in Appendix A – FLOODING QUANTITATIVE DESIGN LIMITS AND MODELLING REQUIREMENTS; (d) floor level surveys of potentially affected buildings to accurately confirm compliance with afflux limits. Where a floor level has not been surveyed, the Report shall adopt the existing ground level as the floor level, with appropriate annotation; (e) an assessment of the impacts of the CSSI on erosion, scouring, bank stability, stream stability and geomorphology; (f) mitigation and management measures that will be undertaken if the QDLs are exceeded, as specified in Condition E27; (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; (h) an assessment of risk to life caused by formation failure in extreme flood events, including management measures to mitigate this risk; and (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. 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. 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	<ul style="list-style-type: none"> "Narrabri to North Star Flood Design Verification Report for Phase 1 Issued For Construction", July 2022 Rev 0, dated 5/07/2022. DPE Letter, "Flood Design Verification Report for Narrabri to North Star (Condition E28 of SSI 7474)", Ref: SSI-7474-176, dated 3/08/2022 Interview with Auditees, 14/11/2024 	C	The Flood Design Verification Report required by Condition E28 was submitted to DPE (now DPHI) on 6/07/2022.

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Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
Independent Peer Review				
E29	<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).</p> <p>The review must:</p> <p>(a) review the flood model files and the description of the model provided within SPIR and any adjustments to this as per the Flood Design Verification Report;</p> <p>(b) assess the establishment, calibration, validation and operation of the flood model items as per (a);</p> <p>(c) identify and document existing and future purposes for which the model can and cannot be used, including adaptation of this model by others, and any limitations on this;</p> <p>(d) document the review findings including specifically responding to Condition E28(a) to E28(i) and, after any recommended model and/or reporting improvements have been undertaken to the peer reviewer's satisfaction, provide written certification within the review report that the Flood Design Verification Report, modelling and mitigation measures:</p> <p>i) have been prepared consistent with current and appropriate methodologies and standards; and</p> <p>ii) accurately depict and resolve design impacts of the CSSI.</p> <p>The peer reviewer's endorsement must be appended to the Flood Design Verification Report.</p> <p>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.</p>	<ul style="list-style-type: none"> • "Narrabri to North Star Flood Design Verification Report for Phase 1 Issued For Construction", July 2022 Rev 0, dated 5/07/2022. • "Peer Review of Flood Modelling undertaken for Narrabri to North Star - Phase 1", Version 00.03, dated 20/04/2022. • DPE Letter, "Flood Design Verification Report for Narrabri to North Star (Condition E28 of SSI 7474)", Ref: SSI-7474-176, dated 3/08/2022 • Interview with Auditees, 14/11/2024 	C	The Flood Design Verification Report required by Condition E28, including the Independent Peer Review required by Condition E29 was submitted to DPE (now DPHI) on 6/07/2022.
Flood Emergency Response Plan (FERP) for Flood Risks within the Rail Corridor				
E30	<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> <p>(a) The FERP must be prepared by an experienced flood emergency response specialist who has extensive experience in preparation of these plans.</p> <p>(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.</p> <p>(c) The FERP must be appended to the Flood Design Verification Report.</p> <p>Note: Nothing in this condition prevents the adaptation of an existing flood management or emergency plan to satisfy this condition.</p>	<ul style="list-style-type: none"> • "Narrabri to North Star Flood Design Verification Report for Phase 1 Issued For Construction", July 2022 Rev 0, dated 5/07/2022. • DPE Letter, "Flood Design Verification Report for Narrabri to North Star (Condition E28 of SSI 7474)", Ref: SSI-7474-176, dated 3/08/2022 • Interview with Auditees, 14/11/2024 	C	The Flood Design Verification Report required by Condition E28, including the Flood Emergency Response Plan required by Condition E30 as submitted to DPE (now DPHI) on 6/07/2022.
Information to Facilitate Management of Flood Emergency Risks beyond the Rail Corridor				
E31	<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> <p>(a) documentation of the changes to flood behaviour including levels, depths, velocities, etc, that may result in adverse impacts to life and property beyond the rail corridor, in any future flood events including events up to the PMF;</p> <p>(b) consideration of changes to flood behaviour that may result from CSSI infrastructure failures or embankment collapses where these may occur during floods;</p> <p>(c) provision of sufficient detail and scope to enable the relevant personnel or agency (including the NSW SES, the local council, affected property or infrastructure owners) to prepare for management of flood emergencies;</p> <p>(d) respond to requests for information about the CSSI from those personnel or agencies in</p> <p>(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>	<ul style="list-style-type: none"> • "Narrabri to North Star Flood Design Verification Report for Phase 1 Issued For Construction", July 2022 Rev 0, dated 5/07/2022. • DPE Letter, "Flood Design Verification Report for Narrabri to North Star (Condition E28 of SSI 7474)", Ref: SSI-7474-176, dated 3/08/2022 • Interview with Auditees, 14/11/2024 	C	The Flood Design Verification Report (FDVR) required by Condition E28, including the Information to Facilitate Management of Flood Emergency Risks beyond the Rail Corridor (Section 5 of the FDVR) required by Condition E31 was submitted to DPE (now DPHI) on 6/07/2022.

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Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
Flood Review after Construction				
E32	<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> <p>(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;</p> <p>(b) identification of the properties and infrastructure affected by flooding during the reportable event; and</p> <p>(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:</p> <p>i) determine if the exceedance is attributable to the CSSI, and</p> <p>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> <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>	<ul style="list-style-type: none"> • "April 2024 Event Flood Review Report Inland Rail Narrabri to North Star Phase 1", July 2024 Rev D, dated 9/07/2024. • ARTC letter "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval E32 – Flood Review after Construction", dated 9/07/2024 submitting the above Flood Review Report. • ARTC email "Flood Review Report", dated 10/07/2024 submitting the above Flood Review Report to the Secretary. • ARTC email "Flood Review Report - Croppa Creek CSSI 7474", dated 10/07/2024 submitting the above Flood Review Report to the NSW Department of Climate Change, Energy, the Environment and Water. • ARTC email "Flood Review Report - Croppa Creek CSSI 7474", dated 10/07/2024 submitting the above Flood Review Report to the Gwydir Shire Council. • DPHI Compliance email "SSI-7474-PA-263 CSSI 7474 - Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval E32 – Flood Review Report Croppa Creek - RFI-74797716", dated 15/07/2024 • Major Projects Portal Post Approval Form 20240830021039 - Narrabri to North Star - SSI-7474-PA-273 - Response to RFI74797716 • Major Projects Portal email dated 18/08/2023, titled "Inland Rail - Narrabri to North Star Phase 1 - Post Approval Document Received - (SSI-7474-PA-273)". ARTC response to RFI74797716 • DPHI Compliance letter "Narrabri to North Star (SSI-7474) - April 2024 Flood Review Report Croppa Creek", dated 19/09/2024 general accepting the document and requesting inclusion of certain information in future Flood Review Reports in accordance with Condition E32(c)(i) and (ii). • Audit Inspection, 12/11/24 • Interview with Auditees, 14/11/2024 	NC	<p>The first defined flood event with a flood magnitude range of 10-20% AEP occurred from 4 April 2024 to 6 April 2024.</p> <p>A Flood Review Report was prepared for the for the event by a by a suitably qualified and experienced hydrologist(s), which was submitted to the Secretary, the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) and to Gwydir Shire Council on 10 July 2024.</p> <p>The report included a comparison of the observed extent, level, and duration of the flooding event against those predicted in the Flood Design Verification Report (FDVR) and identified refinements needed due localised spatial assumptions made in the FDVR for Buckie road Croppa Creek, as a result of insufficient anecdotal data at the time of preparation of the FDVR. These refinements were made to the model and the model validated with observed data. The deficiencies did not impact compliance of the as-built project with the QDLs. The report identified five (5) properties affected by flooding during the reportable event, with the observed extent and level of flood or erosion impacts exceeding those predicted due to the CSSI at 3 of the five properties. However, the QLDs specified in Conditions E27 and E28 were not exceeded. The flood review report does not identify specific rectification measures to be implemented to reduce future adverse impacts of flooding from similar events related to the CSSI works, nor the timing and responsibilities for implementation. It is noted that at the time of this Audit specific rectification measures to be implemented following the April 2024 reportable event, and timing and responsibilities for implementation have not been finalised with the affected third parties, with discussions/negotiations ongoing.</p> <p>This Audit identified the following non-compliance:</p> <ul style="list-style-type: none"> • IOA1 – NC04 recorded against CoA E32(c) ii) - identification of specific 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 where not provided in the Flood Review Report for the April flood event. The Flood Review Report simply states that rectification measures would be determined in consultation with the landowner in accordance with the procedures within the Communications and Engagement Plan for Narrabri to North Star Phase 1 Interim Operations (Inland Rail, December 2023) which provides a general framework only. Given the inherent complexities associated with the investigative aspects of the report, and formulation of feasible and reasonable rectification measures in consultation with the affected third parties, it is recommended that future Flood Review Reports the Project seek an extension under Condition A6 for submission in a staged manner, with identification of specific rectification measures and responsibilities for implementation addressed in an addendum to the report within a timeframe agreed with the Secretary for the particular event.

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Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
E33	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.	<ul style="list-style-type: none"> WSP Memo "Flood Monitoring Plan for N2NS Phase 1", Ref:3-0001-260-IHY-00-ME-0015_C , dated 5/07/2022. Major Projects Portal Post Approval Form 20230818003730 - Narrabri to North Star - SSI-7474-PA-237 Major Projects Portal email dated 18/08/2023, titled "Inland Rail - Narrabri to North Star Phase 1 - Post Approval Document Received - (SSI-7474-PA-237)" Audit Inspection, 12/11/24 Interview with Auditees, 14/11/2024. Review of Croppa Creek Monitoring station live telemetry and video stream with Auditees, 29/11/2024. 	C	<p>The Flood Monitoring Plan for N2NS Phase 1 prepared to address Condition E33 was submitted to the Planning Secretary for information on 18/8/23 - within six (6) months prior to the commencement of operation of the CSSI on 27 October 2023.</p> <p>It is noted the ARTC managed Water Level Logger at Croppa Creek Bridge had malfunctioned during the flood event that occurred from 4 April 2024 to 6 April 2024 - the malfunction occurred due to deficiencies with its installation, and the project had not been aware of the malfunction at the time. The following rectification measures were implemented to prevent recurrence of the malfunction and improve awareness of functionality:</p> <ul style="list-style-type: none"> Wiring harnesses have been protected within conduit to prevent damage by fauna. A 6 monthly service cycle is in place. An alarm and emails are generated to various ARTC personal when preset thresholds are triggered. Alarm events are investigated for reliability and extraneous readings. Manufacturer contacted to provide support and servicing if alarm event is found to be extraneous and/or the likely result of a malfunction. A flood trigger action response plan is currently being developed.
Information Sharing				
E34	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 NARRABRI TO NORTH STAR PHASE 1: OPERATIONAL STAGING REPORT October 2023 	NT	<p>Construction continues and is yet to be completed.</p> <p>Auditees indicate notifications will be distributed once construction is complete.</p>
WATER QUALITY AND DRAINAGE				
E35	<p>The CSSI must be designed, constructed and operated so as to:</p> <p>(a) maintain the NSW Water Quality Objectives where they are being achieved as at the date of this Approval;</p> <p>(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;</p> <p>(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;</p> <p>(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> <p>(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;</p> <p>(f) ensure that there is no permanent interception of, and/or connection with, groundwater;</p> <p>(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;</p> <p>(h) ensure works on waterfront land are undertaken in accordance with the NRAR guidelines for controlled activities on waterfront land;</p> <p>(i) 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>	<ul style="list-style-type: none"> "April 2024 Event Flood Review Report Inland Rail Narrabri to North Star Phase 1", July 2024 Rev D, dated 9/07/2024. Audit Inspection 12/11/24 Interview with Auditees, 14/11/2024 	C	<p>Appreciable erosion and scouring has been noted at some areas, including at culverts (e.g., Pan, Boggy and Bulldog Creeks), indicating that refinement of the scour and erosion protection and hydraulic design for those areas is required. However, the Project remains compliant across the alignment and the design refinement process is underway for those areas. However, an opportunity for improvement was observed during the Audit inspection as outlined below.</p> <p>• IOA1 – OFI02 E35 (g) While various measures have been implemented in an attempt to ensure all discharges from new or modified surface drainage adjacent to the new and upgraded track are released at a controlled rate, significant scour was observed at chainage 745.879 km where surface water drains towards a culvert. The scour appears to be due to the poor design of local erosion and sediment control measures . and has resulted in significant damage to a track access road rendering it unusable/inaccessible. It is recommended that an appropriate design be developed for the area by a suitably qualified designer, and implemented.</p>
E36	The Proponent must consult with TfNSW in relation to stormwater and drainage management to coordinate drainage infrastructure with the Newell Highway Upgrade.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Evidence of consultation with TfNSW on the subject aspect was noted to have been sighted in Independent Environmental Audit 5 of 22 September 2023.

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NC	Non compliant
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Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
E37	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	No new culverts were installed during the Audit Period.
TRAFFIC, TRANSPORT AND ACCESS				
E38	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 C4.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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): (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 (c) where other agreements are in place, leave, maintain or remunerate for damages to these roads in accordance with these agreements.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 <p><u>Documents Viewed:</u></p> <ul style="list-style-type: none"> Road Use And Degradation Costs restitution agreement between Inland Rail and Moree Plains Shire - Executed 10/01/2024 Road Use And Degradation Costs restitution agreement between Inland Rail and Narrabri Shire Council - Executed 30/11/2023 Email correspondence between Inland Rail and Gwydir Shire Council agreeing road use and degradation restitution costs - Dated 25/10/2023 Email correspondence between Inland Rail and Gwydir Shire Council agreeing road use and degradation restitution costs - Dated 25/10/2023 Temporary Land Occupation Agreements with Whibley family and Property Agreement Closeout Form dated 7/06/2024 	C	Evidence indicates compensation agreements were reached / entered into with landowners and relevant road authorities (local councils).
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E42	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 C4.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.

Item
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Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
Level Crossing Treatment Reports				
E43	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: (a) illustrate the location of all public level crossings which traverse the CSSI; (b) 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; (c) where no works are proposed at a public crossing, provide reason for the decision; (d) consider measures to avoid potential short-stacking at level crossings; and (e) provide justification for any proposed closures. 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. 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). 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E44	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: (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. 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/RISRB 7658:2012 Railway Infrastructure – Railway Level Crossing and relevant rail safety legislation. The Proponent must consult with relevant landowners on the design of the crossing and where consistent with relevant safety standards and legislation, incorporate landowner requirements into the design.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E45	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.	• Interview with Auditees, 14/11/2024	NT	No level crossings upgraded or closed during the Audit Period.
Level Crossing Performance Report				
E46	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: (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; (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 (f) mitigation measures to manage any actual or predicted road network performance impacts.	• DPHI Letter, "Narrabri to North Star, Phase 1 (CSSI-7474) Time Extension Request Level Crossing Performance Report (E46) and Operational Noise Compliance Report (E16)", Ref: SSI-7474-265, dated 20/08/2024 • Interview with Auditees, 14/11/2024	NT	DPHI Letter Ref: SSI-7474-265, dated 20/08/2024, grants a 2 year extension for the submission of the Level Crossing Performance Report required by condition E46.

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E47	Each Level Crossing Performance Report must also review the impact on level crossings interacting with local roads and include: (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.	<ul style="list-style-type: none"> DPHI Letter, "Narrabri to North Star, Phase 1 (CSSI-7474) Time Extension Request Level Crossing Performance Report (E46) and Operational Noise Compliance Report (E16)", Ref: SSI-7474-265, dated 20/08/2024 Interview with Auditees, 14/11/2024 	NT	DPHI Letter Ref: SSI-7474-265, dated 20/08/2024, grants a 2 year extension for the submission of the Level Crossing Performance Report required by condition E46.
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. 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.	<ul style="list-style-type: none"> DPHI Letter, "Narrabri to North Star, Phase 1 (CSSI-7474) Time Extension Request Level Crossing Performance Report (E46) and Operational Noise Compliance Report (E16)", Ref: SSI-7474-265, dated 20/08/2024 Interview with Auditees, 14/11/2024 	NT	DPHI Letter Ref: SSI-7474-265, dated 20/08/2024, grants a 2 year extension for the submission of the Level Crossing Performance Report required by condition E46.
Property Access				
E49	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E52	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Road safety				
E53	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	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E54	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. 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Pedestrian and Cyclist Access				
E55	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Transport Network and Connectivity Analysis (Jones Avenue Overbridge)				
E56	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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.

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NC	Non compliant
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NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
E57	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. 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. The analysis must consider: (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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E58	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: (a) potential community severance caused by the proposal; (b) pedestrian and cyclist movement patterns, existing as well as those associated with future infrastructure or strategic planning initiatives being undertaken in the locality; (c) measures to minimise informal rail corridor crossings; and (d) an assessment of potential crossings that considers: 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 vi) pedestrian access during extended severance events, including a train breakdown blocking level crossings.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
E59	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. 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. The approved crossings (including vehicular, cycle and pedestrian crossings) must be completed by 2025, unless otherwise approved by the Planning Secretary. 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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
SPOIL MOUNDS				
E60	Permanent spoil mounds are to be located: (a) within the existing rail corridor; (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. 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.	<ul style="list-style-type: none"> "April 2024 Event Flood Review Report Inland Rail Narrabri to North Star Phase 1", July 2024 Rev D, dated 9/07/2024. Audit Inspection 12/11/24 Interview with Auditees, 14/11/2024 	C	<ul style="list-style-type: none"> IOA1 – OFI03 Small mound (less than 1m high) located adjacent culvert at chainage 745.430 as outlined in the 4 to 6 April flood event Flood Report and observed during the Audit inspection. The small mound is partially blocking the predominant north to south flow path along the western side of the rail corridor and diverting more flow locally through culvert, causing soil erosion across the adjacent cropping paddock during the April 2024 event. It is recommended that ARTC remove this mound as matter of priority to prevent further soil erosion within the adjacent cropping paddock.

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E61	Spoil mounds are to comply with the following requirements: (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 (i) are to be stabilised prior to operation of the CSSI.	<ul style="list-style-type: none"> "April 2024 Event Flood Review Report Inland Rail Narrabri to North Star Phase 1", July 2024 Rev D, dated 9/07/2024. Audit Inspection 12/11/24 Interview with Auditees, 14/11/2024 	C	Compliant based on information gathered from documents attached and observations at the Audit Inspection
VISUAL AMENITY				
E62	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'.	<ul style="list-style-type: none"> "Narrabri to North Star 100% Detailed Design Report", March 2019 RevA, dated 15/03/2022. Complaints Register - 13 October 2023 to 25 October 2024 Interview with Auditees, 14/11/2024 	C	There were no complaints registered during the Audit Period in relation to lighting. The Detailed Design Report considers the requirements of the condition but does not propose changes to existing permanent lighting as part of the design report scope.
E63	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.	<ul style="list-style-type: none"> "Narrabri to North Star 100% Detailed Design Report", March 2019 RevA, dated 15/03/2022. Complaints Register - 13 October 2023 to 25 October 2024 Interview with Auditees, 14/11/2024 	C	There were no complaints recorded during the Audit Period in relation to lighting. The Detailed Design Report considers the requirements of the condition but does not propose changes to existing permanent lighting as part of the design report scope.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
HERITAGE				
E65	The Proponent must not destroy, modify or otherwise physically affect any heritage items, including Aboriginal objects, outside of the CSSI construction boundary.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No works likely to affect heritage items.
E66	The Proponent must not harm, modify, or otherwise impact human remains uncovered during the construction of the CSSI.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No works likely to affect human remains.
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 C4.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No works likely to affect heritage items.
Non-Aboriginal Heritage				
E68	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period.
E69	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period.
Aboriginal Heritage				
E70	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).	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No Investigation activities conducted within the expanded construction footprint identified in the SPIR.

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E71	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: (a) Undertake archaeological investigations; and (b) report on the results of the archaeological investigation, including, but not necessarily be limited to: 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 iv) demonstration of additional consultation with the Registered Aboriginal Parties about items i) to iii).	• Interview with Auditees, 14/11/2024	NT	Not triggered during the Audit Period. Construction and pre-construction requirement.
E72	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 C4.	• Interview with Auditees, 14/11/2024	NT	Not triggered during the Audit Period. No Investigation activities conducted within the expanded construction footprint identified in the SPIR.
LAND USE AND PROPERTY				
Dilapidation Surveys and Rectification				
E73	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).	• Interview with Auditees, 14/11/2024	NT	Not triggered during the Audit Period. No vibration generating activities undertaken.
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.	• Interview with Auditees, 14/11/2024	NT	Not triggered during the Audit Period. No vibration generating activities undertaken.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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.	Not applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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 applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
Rehabilitation				
E78	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 applicable	NT	Not applicable to Operational Staging Report Stage 3 - Operations as per Appendix A of the Narrabri To North Star Phase 1: Operational Staging Report, October 2023.
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.	<ul style="list-style-type: none"> Inland Rail letter to DPPI "CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Project Infrastructure Sustainability Council of Australia 'As built' Rating Minister's Conditions of Approval E79", dated 18/09/2024 submitting the above Flood Review Report. 2024-07-29 131 N2NS (IR) As Built R2 verification scorecard 	C	Evidence reviewed indicates the Project achieved an "excellent" rating for "As built"

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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.	<ul style="list-style-type: none"> "April 2024 Event Flood Review Report Inland Rail Narrabri to North Star Phase 1", July 2024 Rev D, dated 9/07/2024. Audit Inspection 12/11/24 Interview with Auditees, 14/11/2024 	C	An opportunity for improvement was observed during the Audit inspection as outlined below. <ul style="list-style-type: none"> IOA1 – OFI04 While various erosion and sediment controls were attempted to minimise any water pollution at the particular location, significant scour was observed at chainage 745.879 km. where surface water drains towards a culvert. The scour appears to be due to the poor design of local erosion and sediment control measures . and has resulted in significant damage to a track access road, rendering it unusable/inaccessible. It is recommended that erosion and sediment controls in accordance with guidance in the Managing Urban Stormwater series be designed for the area by a suitably qualified designer, and implemented.
Contaminated sites				
E81	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No unexpected contamination finds.
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	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No unexpected contamination finds.
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No unexpected contamination finds.
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No unexpected contamination finds.
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No unexpected contamination finds.
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.	<ul style="list-style-type: none"> Complaints Register - 13 October 2023 to 25 October 2024 Interview with Auditees, 14/11/202 Site Inspection, 12/11/202 	C	There were no complaints recorded in relation to dust or air pollution during the Audit Period No dust or other air pollutants noted during the Audit Inspection (12 November 2024) as a result of track operations.

Item
Project Name: N2NS SP1 Independent Environmental Audit SSI 7474
Auditee/ Client: Australian Rail Track Corporation Limited (ARTC)
Lead Auditor: Swathi Gowda, Healthy Buildings International
Auditor/Audit Team Member: Rui Henriques, Healthy Buildings International
Audit Details: First Operational Independent Audit (IA1)
HBI Project No. 240808 Narrabri to North Star SP1

Result	Comment
NC	Non compliant
C	Compliant
NT	Not Triggered

Condition	Requirement	Evidence	Compliance Status	Independent Audit Findings and Recommendations
WASTE				
E87	Waste generated during construction and operation is to be dealt with in accordance with the following priorities: (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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Tax invoice dated 16/10/2024 from Moree Plains Shire Council for disposal of bricks. 	C	Waste directly related to operations and maintenance generated during the audit period was limited to a load off of bricks removed from Gurley Railway Station and disposed at the Moree Plains Shire Council Waste facility pre classified as General Solid Waste
E88	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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 	NT	Not triggered during the Audit Period. No waste imported.
E89	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. 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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Tax invoice dated 16/10/2024 from Moree Plains Shire Council for disposal of bricks. 	C	Waste directly related to operations and maintenance generated during the audit period was limited to a load off of bricks pre classified as General Solid Waste removed from Gurley Railway Station and disposed at the Moree Plains Shire Council Waste facility which is licensed by the EPA to receive the type of waste.
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.	<ul style="list-style-type: none"> Interview with Auditees, 14/11/2024 Tax invoice dated 16/10/2024 from Moree Plains Shire Council for disposal of bricks. 	C	Waste directly related to operations and maintenance generated during the audit period was limited to a load off of bricks removed from Gurley Railway Station and disposed at the Moree Plains Shire Council Waste facility pre classified as General Solid Waste.



HBI

Healthy Buildings International

APPENDIX B – AGREEMENT OF INDEPENDENT AUDITORS



NSW Planning Ref: SSI-7474-PA-274

Stuart Ross
Senior Manager Environmental Systems
Australian Rail Track Corporation Limited
Locked Bag 1
Broadmeadow New South Wales 2292

5 September 2024

Sent via the Major Projects Portal only

Subject: Narrabri to North Star - Operational Independent Audit Auditor Nomination

Dear Mr Ross,

Reference is made to your post approval matter, SSI-7474-PA-274, requesting the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct the first operational Independent Audit of the Inland Rail, Narrabri to North Star Phase 1 project ('the Project'), submitted as required by Part A, Condition A35 of SSI-7474 ('the Approval'), as modified to NSW Department of Planning, Housing and Infrastructure ('NSW Planning') on 30 August 2024.

I have reviewed the independent auditor nominations and based on the information you have provided I am satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Part A, Condition A35 of the Approval and the NSW Planning, *Independent Audit Post Approval Requirements* (May, 2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Swathi Gowda as Lead Auditor; and
- Rui Henriques as Auditor / Audit Team Member.

Please provide a copy of Rui Henriques' Exemplar Global Lead Environmental Management Auditor Certification to me prior to commencement of the audit. Failure to do so will mean that Rui Henriques is not approved as an audit team member.

Please ensure this correspondence is appended to the independent audit report.

In accordance with Part A, Condition A4 of the Approval, and as a delegate of the Planning Secretary, I direct Australian Rail Track Corporation Limited to conduct the independent audit for the period from the commencement of operations to the date of the audit site inspection.

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

NSW Planning reserves the right to request an alternate lead auditor or audit team for future audits.

Department of Planning, Housing and Infrastructure



Notwithstanding the endorsement of the above independent audit team for the Project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning 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.

Should you wish to discuss the matter further, please contact me on 02 6670 8652 or email compliance@planning.nsw.gov.au

Yours sincerely

Nick Ballard

Nick Ballard
Team Leader – Far North Region
Planning Compliance | Development Assessment & Sustainability

As nominee of the Planning Secretary

From: [Nick Ballard](#)
To: [Brodie McDougall](#)
Subject: [EXT] RE: CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval A35 – Proposed Independent Auditor Agreement
Date: Wednesday, 18 September 2024 4:28:14 PM
Attachments: [image001.png](#)
[image002.png](#)

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If you believe this email is suspicious, please report it with the "Report Phishing" icon in Outlook, or forward to suspiciousemails@artc.com.au.

Hi Brodie,

Thanks for sending this through.

Just confirming that as per our letter dated 3 September 2024 Swathi will be the lead auditor and Rui will be the auditor with the expectation that the lead auditor lead the site inspection.

Thanks

Nick Ballard

Team Leader Compliance – Far North Region
Planning Compliance | Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure

M 0400 666 027 | T 02 6670 8652 | E nick.ballard@dpie.nsw.gov.au
dphi.nsw.gov.au

PO Box 72, Murwillumbah NSW 2484 | Level 1, 135 Murwillumbah Street, Murwillumbah NSW 2484

Working days Monday to Friday - Please note that I work flexibly. I'm sending this message now because it's a good time for me, but I don't expect that you will read, respond to or action it outside of your own regular hours.



If you are submitting a compliance document or request as required under the conditions of consent or approval, please note that the Department is no longer accepting lodgement via compliance@planning.nsw.gov.au. Please submit all post approval documents online, via the Major Projects website. To do this, please refer to the instructions available [here](#).

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

Please consider the environment before printing this email.

From: Brodie McDougall <BMcDougall@ARTC.com.au>
Sent: Wednesday, September 18, 2024 3:57 PM
To: Nick Ballard <Nick.Ballard@dpie.nsw.gov.au>
Cc: Tyler Warren <TWarren@ARTC.com.au>; Stuart Ross <SRoss@ARTC.com.au>
Subject: RE: CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval A35 – Proposed Independent Auditor Agreement

Good afternoon Nick,

Please refer attached updated Auditor certification for Rui Henriques as requested.

Kind regards,

Brodie McDougall

Lead – Environment Systems
Safety & Environment



M. 0438 790 544

E. BMcDougall@artc.com.au

Australian Rail Track Corporation

Level 3/1 Richmond Rd
Keswick SA 5035

artc.com.au

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From: Nick Ballard <Nick.Ballard@dpie.nsw.gov.au>

Sent: Thursday, 5 September 2024 2:20 PM

To: Brodie McDougall <BMcDougall@ARTC.com.au>; Stuart Ross <SRoss@ARTC.com.au>

Cc: Tyler Warren <TWarren@ARTC.com.au>

Subject: [EXT] RE: CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval A35 – Proposed Independent Auditor Agreement

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Hi Brodie and Stuart,

Further to our conversations yesterday and today concerning the initial operational independent auditor approval letter issued on 3 September 2024.

I have updated the original letter to confirm the audit period for the audit.

Please note that this letter supersedes the 3 September 2024 letter issued via the Major Projects Portal (SSI-7474-PA-274). Can you ensure this letter is appended to the Independent Audit Report.

A copy of this letter will be saved to the case SSI-7474-PA-274. Please also pass this letter onto the auditors for their information.

If you have any questions or comments don't hesitate to contact me.

Best Regards

Nick Ballard

Team Leader Compliance – Far North Region
Planning Compliance | Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure

M 0400 666 027 | **T** 02 6670 8652 | **E** nick.ballard@dpie.nsw.gov.au
dphi.nsw.gov.au

PO Box 72, Murwillumbah NSW 2484 | Level 1, 135 Murwillumbah Street, Murwillumbah NSW 2484

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

Please consider the environment before printing this email.

From: Tyler Warren <TWarren@ARTC.com.au>
Sent: Friday, August 30, 2024 12:49 PM
To: Nick Ballard <Nick.Ballard@dpie.nsw.gov.au>
Cc: Brodie McDougall <BMcDougall@ARTC.com.au>
Subject: CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Ministers Conditions of Approval A35 – Proposed Independent Auditor Agreement

Hi Nick

I have just now lodged ARTC's proposed independent auditor agreement notification via the NSW Major Projects Planning Portal. ARTC's proposed audit team are from Healthy Buildings International (HBI) and would be co-led by Swathi Gowda and Rui Henriques.

As a note, as of this coming Monday I will be off on primary carers leave for 10 weeks. Brodie McDougall (cc'd above) will be the most appropriate person to contact in relation to this matter and any other matters that may arise relating to N2NS SP1 in this time.

Thanks

Tyler Warren
Operational Readiness – Environment Advisor
ARTC Interstate Network

M. 0417 627 876

E. twarren@artc.com.au

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APPENDIX C – AUDIT PLAN AND ATTENDANCE RECORDS



1. Summary

Meeting title ARTC N2NS CSSI 7474 close out meeting
Attended participants 7
Start time 11/27/24, 9:29:27 AM
End time 11/27/24, 10:20:59 AM
Meeting duration 51m 31s
Average attendance time 48m 37s

2. Participants

Name	First Join	Last Leave
Tyler Warren	11/27/24, 9:30:21 AM	11/27/24, 10:20:53 AM
Brodie McDougall	11/27/24, 9:30:20 AM	11/27/24, 10:20:55 AM
Swathi Gowda (External)	11/27/24, 9:30:27 AM	11/27/24, 10:20:59 AM
Peter Borrelli	11/27/24, 9:30:32 AM	11/27/24, 10:20:57 AM
Stuart Ross	11/27/24, 9:30:42 AM	11/27/24, 10:18:42 AM
Sara Conway	11/27/24, 9:31:47 AM	11/27/24, 10:16:00 AM
Rui Henriques (External)	11/27/24, 9:34:51 AM	11/27/24, 10:20:57 AM

3. In-Meeting Activities

Name	Join Time	Leave Time
Tyler Warren	11/27/24, 9:30:21 AM	11/27/24, 10:20:53 AM
Brodie McDougall	11/27/24, 9:30:20 AM	11/27/24, 10:20:55 AM
Swathi Gowda (External)	11/27/24, 9:30:27 AM	11/27/24, 10:20:59 AM
Peter Borrelli	11/27/24, 9:30:32 AM	11/27/24, 10:20:57 AM
Stuart Ross	11/27/24, 9:30:42 AM	11/27/24, 10:18:42 AM
Sara Conway	11/27/24, 9:31:47 AM	11/27/24, 10:16:00 AM
Rui Henriques (External)	11/27/24, 9:34:51 AM	11/27/24, 10:20:57 AM

Audit Plan



HBI

Healthy Buildings International Pty Ltd

A.C.N. 03 270 693

A.B.N. 39 003 270 693

Audit Site/Project: Narrabri to North Star (N2NS) Phase 1 <u>Application Number:</u> SS1 7474 (as modified ; the Approval) <u>Proponent:</u> Australian Rail Track Corporation (ARTC) <u>Approval Authority:</u> Minister for Planning and Public Spaces <u>Determination Date:</u> 13 August 2020		Company Client: ARTC Auditee/s or Project Team: ARTC, Operations Readiness Team (ARTC) and Inland Rail
This Audit Plan provides a summary of the proposed first operational Independent Audit (IA1) scheduled to commence with a site inspection on 12 November 2024 .		
Key Auditee Representative/s and Contact Details: ARTC: Brodie McDougall Lead – Environment Systems, Safety & Environment 0438 790 544 bmcdougall@artc.com.au Tyler Warren Environment Advisor - Operational Readiness (ARTC) 0417 627 8761 twarren@artc.com.au		Audit Identification: First operational Independent Audit No. 1 Audit Dates and Indicative Program: <ul style="list-style-type: none"> Refer Appendix A - Indicative Audit Program
Proposed Audit Schedule		
Time	Audit Attendees	Scope (Conditions of Approval)
Day 1: Opening Meeting and Site Inspection – 12 November 2024	<ul style="list-style-type: none"> Lead – Environment Systems, Safety & Environment (ARTC) Environment Advisor - Operational Readiness (ARTC) Member of local ARTC team on-site 	<ul style="list-style-type: none"> Pan Creek Bulldog Creek Boggy Creek Various sites subject of April flood impact near Croppa Creek; and Other specific requirements in email correspondence between ARTC and HBI Auditors (Ref: 30 October 2024 email)
Day 2: Audit interviews and verification of evidence - 14 November 2024 (Teams Meetings)	<ul style="list-style-type: none"> Lead – Environment Systems, Safety & Environment (ARTC) Environment Advisor - Operational Readiness (ARTC) HSE Manager (Inland Rail) Project Director N2NS (Inland Rail) 	<ul style="list-style-type: none"> Consultation Scope Parts A – E of SS1 7474 , as applicable to the operational phase An assessment of incidents, non-compliances and complaints that occurred or were made during the audit period
Lunchbreak: 12:00 -12:30		
Day 2: Initial Closing Meeting - 14 November 2024	<ul style="list-style-type: none"> TBC 	<ul style="list-style-type: none"> Informal closing meeting to provide preliminary summary of the audit findings. A formal closing meeting will be held once all evidence has been reviewed - refer Appendix A.
Audit Team: <ul style="list-style-type: none"> Lead Auditor: Swathi Gowda (Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-442234) 		

- **Auditor/Audit Team Member:** Rui Henriques (Exemplar Global Certified, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-486435)

Audit Objective:

This Independent Audit has been prepared to satisfy Condition A36 of State Significant Infrastructure (SSI) 7474 of the Project planning approval and aims to meet the minimum requirements of the Independent Audit Post Approval Requirements (IAPARs).

Audit Reference Documents:

- *Independent Audit Post Approval Requirements (DPIE, 2020)*
- *ISO 14001: 2015 Environmental Management Systems*
- *AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems*
- Evidence submitted for review during the audit

Audit Period: The temporal period covered by the audit is from the date of commencement of operations (i.e. 27 October 2023) to the date of the audit site inspection on 12 November 2024.

NB: HBI understands from the Client that 27 October 2023 is the date of commencement of operations, as per email correspondence from the Client on 18 October 2024.

Audit Scope: The audit will comprise four main parts: Document Review, Verification of Compliance, Assessment of Environmental Performance, and Reporting.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 7474 (as modified; the Approval), in particular those conditions and requirements which are applicable to the operational phase of the Project (i.e. since operation commencement on 27 October 2023);
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans established in relation to Operation.
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment.
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the Project during the audit period;
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Environmental Management Plans and Sub-plans related to Operation are adequate; and
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

During the consultation period, the Department provided the following feedback in relation to the audit scope on 09 October 2024 requesting:

"the IEA is conducted in accordance with Condition A36 of the Approval, which requires the audit to be carried out in accordance with the Independent Audit Post Approval Requirements (May, 2020). In addition, careful consideration and commentary should be provided for the following matters:

a) The status of flood mitigation measures following the April 2024 weather event in the Croppa Creek region of the Project.

b) The current status of rectification work to Bulldog Creek, Pan Creek and Boggy Creek. The assessment to include, but not be limited to:

- *the status of the decision-making process for planning pathways for each creek*
- *to facilitate the completion of remediation works;*
- *the status of landholder negotiations and/or property owner agreements for each creek with consideration to property access and easement agreements;*
- *the status of the design development phase, including the extent of each erosion impacts to each impact;*
- *the proposed schedule for completion of all rectification works for each creek; and*
- *a summary of the procurement status of contractors responsible for conducting the rectification work.*
- *The above matters must be clearly addressed in the body of the IEA report and must be separate to the compliance status for related conditions of Approval."*

Evaluation of compliance will be carried out in accordance with Sec 3.7 of the IAPARs and documented in an Audit Table, which will include the conditions of SSI 7474. The compliance status of each compliance requirement in the Audit Table will be determined using the relevant descriptors in Sec 3.8, Table 2 of the IAPARs. 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. The Audit Table maybe updated to incorporate Project-specific requirements where necessary.

Documentation and Records: The following list provides a high-level indication of documentation and records that may be requested for review prior to and during the audit (but not limited to):

- Preliminary evidence list including documents and specialist reports, for example:
 - OEMF
 - Operation Compliance Reports
 - ONVR
 - Flood Design Verification Report and Peer Review Report
 - Flood Monitoring Plan
- Audit Reports
- ER Inspection Reports and Monthly Reports
- Complaints Register and complaint response records
- Incident and Non-Compliance Registers/Reports and evidence of action close-out
- Any other applicable approvals, permits or Project-specific environmental requirements
- Evidence of submission of documents and records to the Department and other agencies
- Relevant supporting correspondence from the Department, other agencies and stakeholders

Applicable Site Safety Rules/Inductions required: To be advised by the Auditees

PPE Requirements: To be advised by the Auditees

Any Special Conditions or Requirements: To be advised by the Auditees

Prepared By:

Swathi Gowda
Lead Auditor
Healthy Buildings International Pty Ltd
4 November 2024



Appendix A – Independent Audit Indicative Audit Program

Independent Audit - Task/Details	N2NS Phase 1
<u>Stakeholder Consultation</u>	
DPHI scope consultation commenced	25/09/2024
DPHI scope consultation received	9/10/2024
Other stakeholder scope consultation	N/A
Interview with ER (including scope consultation)	4/11/2024
<u>AUDIT PLANNING/PRELIMINARY DOCUMENT REVIEW (AVAILABLE INFORMATION)</u>	
Pre audit planning including preliminary request for audit evidence. Note: It is the responsibility of the auditee representatives to provide all information within timeframes requested by the Lead Auditor and Auditor	10/10/2024 to 08/11/2024
<u>SITE VISIT/INTERVIEWS</u>	
Opening Meeting and Site Inspection Note: ARTC to arrange Protection Officer for Site Inspection	12/11/2024
Audit interviews and verification of evidence (Parts A - E and Appendices, as applicable to the operational phase of the Project)	14/11/2024
<u>POST VISIT VERIFICATION</u>	
Follow up period for verification of evidence (desktop) - It is the responsibility of the auditee representatives to provide all information within timeframes requested by the Lead Auditor and Auditor	15/11/2024 to 26/11/2024
Closing Meeting - Final (TBC)	27/11/2024
<u>DRAFT REPORTING</u>	
Draft Consolidated Audit Report including Audit Table - N2NS Phase 1	27/11/2024
<u>REVIEW PERIOD</u>	
Auditee Review Period (ARTC): - Comments back within one week (One set of consolidated comments is requested from review of Draft Audit Report). - The Draft Audit Report may only be revised in instances where Auditors are satisfied that the additional information or evidence provided is sufficient to determine that an error of fact or misunderstanding has taken place.	4/12/2024
<u>FINAL REPORTING</u>	
Final Consolidated Audit Report - N2NS Phase 1 issued to ARTC Note: ARTC to issue to DPHI as per CoA/IAPARs	11/12/2024



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Healthy Buildings International

APPENDIX D – CONSULTATION RECORDS



Swathi Gowda
Principal Environmental Consultant
Healthy Buildings International Pty Ltd
Suite 2.06, Level 2,
29-31 Solent Circuit
Norwest NSW 2153

9 October 2024

Sent via email only: hbi@hbi.com.au

Subject: Narrabri to North Star Stage 1 SSI-7474 - Operational Independent Audit – Request for Consultation

Dear Ms Gowda,

Thank you for consulting with the Department of Planning, Housing and Infrastructure in your email dated 25 September 2024 concerning the scope of the first operational Independent Environment Audit ('IEA') for the Narrabri to North Starr Stage 1 project ('**the Project**') approved under CSSI-7474 ('**the Approval**'), as modified.

Please ensure the IEA is conducted in accordance with Condition A36 of the Approval, which requires the audit to be carried out in accordance with the *Independent Audit Post Approval Requirements* (May, 2020).

In addition, careful consideration and commentary should be provided for the following matters:

- a) The status of flood mitigation measures following the April 2024 weather event in the Croppa Creek region of the Project.
- b) The current status of rectification work to Bulldog Creek, Pan Creek and Boggy Creek. The assessment to include, but not be limited to:
 - the status of the decision-making process for planning pathways for each creek to facilitate the completion of remediation works;
 - the status of landholder negotiations and/or property owner agreements for each creek with consideration to property access and easement agreements;
 - the status of the design development phase, including the extent of each erosion impacts to each impact;
 - the proposed schedule for completion of all rectification works for each creek; and
 - a summary of the procurement status of contractors responsible for conducting the rectification work.

The above matters must be clearly addressed in the body of the IEA report and must be separate to the compliance status for related conditions of Approval.

Should you wish to discuss the matter further, please contact me on 02 6670 8652 or email compliance@planning.nsw.gov.au.

Yours sincerely

Nick Ballard

Nick Ballard
Team Leader – Far North Region
Planning Compliance | Development Assessment & Sustainability
Department of Planning, Housing and Infrastructure

As nominee of the Planning Secretary

From: [HBI Frontdesk](#)
To: nick.ballard@dpie.nsw.gov.au
Cc: [Swathi Gowda](#); [Rui Henriques](#); [Jo Robertson](#)
Subject: DPHI Consultation Narrabri to North Star SP1 Independent Audit (SSI 7474)
Date: Wednesday, 25 September 2024 2:12:28 PM
Attachments: [240808_ARTC_N2NS_SP1_DPHI_Consultation_250924.pdf](#)
[image003.png](#)
[2024_09_05_Updated_DPHI_Appointment_of_Experts.pdf](#)

Dear Nick

RE: DPHI Consultation Narrabri to North Star SP1 Independent Audit (SSI 7474)

As the independent auditor engaged by ARTC for the Narrabri to North Star SP1 Independent Audit (N2NS) project (SSI 7474- as modified; the Approval), I am consulting with Department of Planning, Housing and Infrastructure (DPHI) on the scope of the **initial** Independent Operational Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

Please refer to the details in the attached letter. Also included for information, is the DPHI Auditor Appointment with respect to the SSI 7474 Operational Audit.

We look forward to hearing from you no before **8 October 2024** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please respond to:

Attention: Swathi Gowda (Independent Lead Environmental Auditor, HBI)
Email: hbi@hbi.com.au

Yours sincerely

Swathi Gowda
Principal Environmental Consultant

Healthy Buildings International Pty Ltd
Suite 2.06, Level 2, 29-31 Solent Circuit, Norwest NSW 2153
P: 02 9659 5433 | W: www.hbi.com.au



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Nick Ballard
Team Leader Compliance – Far North Region
Department of Planning, Housing and Infrastructure
E nick.ballard@dpie.nsw.gov.au

23 September 2024

Ref: 240808

Dear Nick

RE: DPHI Consultation Narrabri to North Star SP1 Independent Audit (SSI 7474)

As the independent auditor engaged by ARTC for the Narrabri to North Star SP1 Independent Audit (N2NS) project (SSI 7474- as modified; the Approval), I am consulting with Department of Planning, Housing and Infrastructure (DPHI) on the scope of the **initial** Independent Operational Audit in accordance with Section 3.2 of the Department's Independent Audit Post Approval Requirements (or IAPAR).

The consent is available at the following link:

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSI-7474%2120200814T061727.837%20GMT>

The IAPAR is available at the following link:

[Independent Audit Post Approval Requirements - \(nsw.gov.au\)](https://www.dpie.nsw.gov.au/Independent-Audit-Post-Approval-Requirements)

The audit will commence with a site inspection scheduled the week of 11 November 2024 and pertains to post-approval requirements and compliance during Operation. The intention would be to deliver the final audit on or before the 20 December 2024.

The proposed scope of the audit is as follows and has been prepared in consideration of Section 3.3 of the IAPARs:

- an assessment of compliance with SSI 7474
- an assessment of compliance with post approval documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Plans and Sub-plans established in relation to Operation;
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
 - actual impacts compared to predicted impacts documented in the environmental impact assessment;
 - the physical extent of the development in comparison with the approved boundary;
 - incidents, non-compliances and complaints that occurred or were made during the audit period;
 - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit;
 - feedback received from the Department, and other agencies and stakeholders on the environmental performance of the project during the audit period;



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- the status of implementation of previous Independent Audit findings, recommendations and actions (if any);
- a high-level assessment of whether Operational Plans and Sub-plans are adequate.
- any other matters considered relevant by the auditor or the Department taking into account relevant regulatory requirements and legislation and knowledge of the development's past performance.

In providing input to the scope, we kindly request that DPHI confirm any key issues it would like examined, relating to post-approval requirements and compliance, including other agency consultation.

We look forward to hearing from you no before **8 October 2024** (or earlier, if possible) to enable meeting the audit schedule and requirements. Please respond to:

Attention: Swathi Gowda (Independent Lead Environmental Auditor, HBI)

Email: hbi@hbi.com.au




Also included for information, is the DPHI Auditor Appointment with respect to the SSI 7474 Operational Audit.

Yours sincerely

Swathi Gowda
Principal Environmental Consultant

Encl. Auditor agreement from DPHI

APPENDIX E – SITE INSPECTION OBSERVATIONS, NOTES AND PHOTOS

SITE INSPECTION NOTES AND PHOTOS	
	
<p>Pan Creek – View west with area overgrown and downstream scour in the background.</p>	<p>Pan Creek – View east to new culvert structure.</p>
	
<p>Bulldog Creek - View west showing downstream scour.</p>	<p>Bulldog Creek - View east to new culvert structure.</p>
	
<p>Boggy Creek - View southwest creek channel.</p>	<p>Boggy Creek - View south along new culvert structure.</p>





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Croppa Creek Public School Principal's house – note garage on right with floor slab on ground and on piers with suspended floor.



Croppa Creek Public School Principal's house driveway from Buckie Road – note difference in level from Buckie Road.



Buckie Road, Croppa Creek – View of raised road from Level crossing culvert structure to Principal's house.



Buckie Road, Croppa Creek – View west of level crossing culvert structure.



Croppa Creek bridge – View northwest across Croppa Creek with flood monitor visible on the right.



Croppa Creek bridge – View north across Croppa Creek showing area well vegetated.





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North of Boonery Park Rd, North Star – View north with new berms along alignment well vegetated.



North of Boonery Park Rd, North Star Five Claw Worm Skink Monitoring location 15A.



North of Boonery Park Rd -LX3165 area of scour within Pearlman Property.



North of Boonery Park Rd - LX3165 area of scour within Pearlman Property.



North of Boonery Park Rd – View north of 745.430 scour area within Pearlman Property with suspect mound blocking downstream flow on the left.



North of Boonery Park Rd – View northeast of 745.430 scour area within Pearlman Property with same suspect mound seen on the right diverting flow to culvert.





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North of Boonery Park Rd - 745.879 significant scour of track access road rendering it inaccessible / unusable.



North of Boonery Park Rd - 745.879 scour of track access road showing failed erosion controls on the right.



North of Boonery Park Rd – View north west at LX316 showing road culvert the discharge of which has resulted in erosion of rail maintenance access road materials to the Pearlman Property.



North of Boonery Park Rd – View north at LX316 showing erosion of the rail maintenance access road along Pearlman property, downstream of the road culvert, after some repairs.





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APPENDIX F – DECLARATIONS



Attachment: Declaration of Independence

Declaration of Independence - SWATHI GOWDA

Project Name	Inland Rail - Narrabri to North Star Phase 1
Consent Number	SSI 7474
Description of Project	<p>Development for the purposes of the Inland Rail - Narrabri to North Star proposal being the upgrade and replacement of the existing rail line between Narrabri and North Star, comprising:</p> <ul style="list-style-type: none"> • upgrade of the track, track formation, underbridges and culverts within the existing rail corridor in two sections: between Narrabri and Moree; and between Camurra and North Star • five new crossing loops within the existing rail corridor, at Bobbiwaa, Waterloo Creek, Tycannah Creek, Coolleearlee, and Murgu • realigning approximately 1.5 kilometres of the Newell Highway near Bellata • a replacement rail bridge at Croppa Creek • a replacement road bridge on the Newell Highway over the rail corridor; and • a new road bridge over the existing rail corridor in Moree.
Project Address	Land within the existing rail corridor between Narrabri and Moree; and Camurra and North Star, NSW
Proponent	Australian Rail Track Corporation (ARTC)
Date	22 August 2024

I declare that:

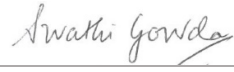
- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of that of a spouse, partner, sibling, parent, or child, or that of an employer/employee, a business partnership, sharing a common employer, or a contractual arrangement outside an Independent Audit, except as otherwise declared to the Department prior to the audit;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow 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 Proposed Auditor SWATHI GOWDA

Signature



Qualification

Exemplar Global Certification, Lead Auditor, Environmental Management Systems Auditor, Certificate No. C-442234.

Company

Healthy Buildings International Pty Ltd.

Attachment: Declaration of Independence

Declaration of Independence - RUI HENRIQUES

Project Name	Inland Rail - Narrabri to North Star Phase 1
Consent Number	SSI 7474
Description of Project	<p>Development for the purposes of the Inland Rail - Narrabri to North Star proposal being the upgrade and replacement of the existing rail line between Narrabri and North Star, comprising:</p> <ul style="list-style-type: none"> • upgrade of the track, track formation, underbridges and culverts within the existing rail corridor in two sections: between Narrabri and Moree; and between Camurra and North Star • five new crossing loops within the existing rail corridor, at Bobbiwaa, Waterloo Creek, Tycannah Creek, Coolleearlee, and Murgoo • realigning approximately 1.5 kilometres of the Newell Highway near Bellata • a replacement rail bridge at Croppa Creek • a replacement road bridge on the Newell Highway over the rail corridor; and • a new road bridge over the existing rail corridor in Moree.
Project Address	Land within the existing rail corridor between Narrabri and Moree; and Camurra and North Star, NSW
Proponent	Australian Rail Track Corporation (ARTC)
Date	22 August 2024

I declare that:


- i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of that of a spouse, partner, sibling, parent, or child, or that of an employer/employee, a business partnership, sharing a common employer, or a contractual arrangement outside an Independent Audit, except as otherwise declared to the Department prior to the audit;
- ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or spouse, partner, sibling, parent, or child;
- iii. I have not provided services (not including independent reviews or auditing) to the project, except as otherwise declared to the Department prior to the audit;
- iv. I am not an Environmental Representative for the project; and
- v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow 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 Proposed Auditor RUI HENRIQUES

Signature



Qualification

Exemplar Global Certification, Lead Auditor, Environmental Management
Systems Auditor, Certificate No. C-486435

Company

Healthy Buildings International Pty Ltd.
