

9 February 2026

IRPL REF# 6-0000-220-EEC-00-LT-0063

Alexander Scott
Director – Freight Assessments
Department of Planning, House and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

Email: alexander.scott@planning.nsw.gov.au, Katrina.oreilly@planning.nsw.gov.au

Dear Alexander

**CSSI 9406 Illabo to Stockinbingal (I2S) Project
Independent Environmental Audit No 1 – Audit Report Submission and Responses
to Findings.
Minister’s Condition of Approval A31**

I refer to the Ministers Conditions of Approval (**MCoA’s**) issued for the Critical State Significant Infrastructure (**CSSI**) Project No 9406 Albury to Illabo 4 September 2024 (**I2S Planning Approval**), and specifically the requirement to submit Independent Audit Reports and the Proponents response to the audit findings to the Planning Secretary within 2 months of undertaking the audit in accordance with MCoA A31.

Following the first Independent Environmental Audit site inspection on 26 and 27 November 2025, and required to be submitted by 27 January 2026. The department granted an extension for submission under MCoA A9 to the 9 January 2026 (ref: SSI-9406-PA-70).

I am now pleased to be able to submit to you the first Independent Environmental Audit report for the I2S project.

Please also refer to Attachment 1 – Response to Audit Findings which outlines the proposed actions and / or current compliance status against the auditor’s findings for the audit period.

If you wish to discuss any of the above further, have any comments or concerns, please either contact Rachael Labruyere, Environment Manager on rlabruyere@inlandrail.com.au or 0419 699 761 or myself on hmercerc@inlandrail.com.au or 0498 049 020.

Yours sincerely



Harry Mercer
IRPL Project Director I2S (Acting)

Inland Rail

Inland Rail Pty Ltd

ACN 094 819 520

ABN 73 094 819 520

Inland Rail is a subsidiary of
Australian Rail Track
Corporation

Suite 2, Level 19, 60 Margaret Street,
Sydney, NSW 2000

Inland Rail, Suite 2, Level 19, 60
Margaret Street, Sydney, NSW 2000

1800 732 761

inlandrailenquiries@inlandrail.com.au

inlandrail.com.au

Attachment 1 - Response to I2S IEA 1 Audit Findings

OFI Reference	Condition Reference	Context	Audit Finding Details	Action / Status
I2S-01_NC-01	A34 and A35	<p>A34. The Planning Secretary must be notified via the Major Projects website 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) and set out the location and nature of the incident.</p> <p>A35. Subsequent notification must be given, and reports submitted in accordance with the requirements set out in APPENDIX A. The requirement to notify the Department under this condition excludes incidents which are solely required to be notified to the Office of the National Rail Safety Regulator.</p> <p>Appendix A1 to A4.</p>	<p>Upon review of the project <i>Incident Register_20251125</i>, it was noted that incident INC-0109909 on 31/10/2025 relates to fencing works along the alignment exceeding the construction impact zone (CIZ) at Chainages 440, 439, 429, 426 and 425. As fencing works exceeded the CIZ, there is potential to impact vegetation outside of approved project disturbance footprint. This incident should have been notified to the Planning Secretary.</p> <p>Notification of the incident referred to in Condition A34 would have triggered Condition A35 had it been reported. As such, this is also non-compliant.</p>	<p>The incident was determined not to be a notifiable incident under A34 following discussions with the ER. John Holland reported the incident on the internal systems including all mitigation measures implemented to close the incident. The incident and associated documentation was not reviewed during the audit nor was the incident included in the audit RFI. The ER has subsequently summarised the incident status and reporting process in email dated 20 January 2026.</p>

Inland Rail

Inland Rail Pty Ltd

ACN 094 819 520

ABN 73 094 819 520

Inland Rail is a subsidiary of Australian Rail Track Corporation

Suite 2, Level 19, 60 Margaret Street,
Sydney, NSW 2000

Inland Rail, Suite 2, Level 19, 60
Margaret Street, Sydney, NSW 2000

1800 732 761

inlandrailenquiries@inlandrail.com.au

inlandrail.com.au

I2S-01_NC-02	E80	<p>In addition to the requirements of Condition E79, prior to construction, the Proponent must prepare a register (the Register) of all farm dams within 100m upstream and 500m downstream of the rail alignment.</p> <p>The components of the Register must be compiled in consultation with the landowner. Copies of parts of the register and supporting documentation that relate to a landowners' property must be provided to the landowner prior to construction. A copy of the Register must be provided to the Planning Secretary at the same time as submission of the Flood Design Verification Report.</p>	<p>No evidence has been provided to determine whether copies of parts of the register and supporting documentation that relate to a landowners' property has been provided to the landowner prior to construction.</p> <p>Furthermore, no evidence has been provided to determine whether a copy of the Register has been provided to the Planning Secretary.</p>	<p>The register was included in Appendix B7 of Revision A (FDVR) submitted to DPHI and agencies for consultation on 5 November 2025. Subsequent revisions of the FDVR include this Appendix. Note this document is not Final and submissions to date are advanced copies prior to completion of agency and stakeholder consultation.</p>
I2S-01_NC-03	E101	<p>Road Safety</p> <p>Before any local road is used by a heavy vehicle for the purposes of construction of the CSSI, a Road Dilapidation Report must be prepared for subject roads and bridges, and interfaces with regional roads.</p> <p>A copy of the Road Dilapidation Report must be provided to the relevant road authority(ies) within one (1) month of completion of the road dilapidation survey and at least two weeks before the road is used by heavy vehicles associated with the construction of the CSSI for endorsement by the roads authority.</p>	<p>No evidence has been provided to determine whether a copy of the Road Dilapidation Report has been provided to the relevant road authority(ies) within the required timeframes stipulated.</p>	<p>The Dilapidation Reports were provided to the Road Authorities (Cootamundra-Gundagai, Junee and TfNSW) via Aconex on 08 August 2025.</p>
I2S-01_NC-04	E135 and E140	<p>E135. Prior to the commencement of any ground disturbance work within areas identified as requiring archaeological investigation or salvage identified in documents listed in Condition A1, the Proponent must prepare and implement an Additional Aboriginal Archaeological Survey Methodology and an Aboriginal</p>	<p>A self-determined non-compliance was identified due to installation of three survey markers within indigenous survey zones 1, 9 and 11.</p> <p>The non-compliance in relation to disturbance of Indigenous Zone 9 on 16 April 2025 was notified to DPHI on 29 April 2025.</p>	<p>This non-compliance has been addressed and is now considered Closed.</p>

		<p>Archaeological Test Excavation Methodology. The methodology must include procedures for additional archaeological survey of Zones 5, 6, 9 and 10, and management protocols including consultation with the Registered Aboriginal Parties, for any Aboriginal objects and sites identified during the survey.</p> <p>E140. Ground disturbance works and construction work may not commence in those areas where archaeological excavation and surface collection of Aboriginal objects is required (including areas identified as requiring further assessment) until the archaeological works described in the Aboriginal Cultural Heritage Assessment reports listed in Condition A1 have been completed.</p>	<p>DPHI requested on 4 June 2025 to submit the heritage survey of the Indigenous Zone 9. Sighted Zone 9 and Zone 10 Clearance Certificate from APEX Archaeology, dated 22 June 2025. The survey was submitted to DPHI on 9 July 2025. Sighted the post approval receipt SSI-9406-PA-29, dated 9 July 2025.</p> <p>Sighted DPHI letter, 2 September 2025, which noted that the project failed to comply with Schedule 2, Conditions E135 and E140 by installing a survey mark in Zone 9 on 16 April 2025 and also noted that the disturbance of the Indigenous Zone 9 did not impact on any Aboriginal sites or places and did not result in harm to Aboriginal cultural values; therefore DPHI advised that no further enforcement actions are proposed.</p> <p>This non-compliance has been addressed and is now considered Closed.</p>	
I2S-01_NC-05	E145	<p>Condition Surveys and Rectification</p> <p>Before commencement of any work, a structural engineer must undertake condition surveys of all buildings, structures, utilities and the like identified in the documents listed in Condition A1 as being at risk of damage. The results of the surveys must be documented in a Condition Survey Report for each item surveyed.</p> <p>Copies of Condition Survey Reports must be provided to the owners of the items surveyed, and no later than one month before the commencement of construction.</p>	<p>Following conditions reports were provided:</p> <ul style="list-style-type: none"> • Illabo to Stockinbingal Road Condition Report Rev. B, dated 29 July 2025. • Pre-Construction Condition Survey for Billabing Creek, dated 3 July 2025. • Pre-Construction Condition Survey for Goldenfields Water Reservoir, dated 2 July 2025. • Pre-Construction Condition Survey for NBN Tower, dated 2 July 2025. • Pre-Construction Condition Survey for 2 West Street, dated 25 June 2025. 	<p>The Condition Surveys were provided to the property owners via Aconex by John Holland.</p> <p>A register of Condition Reports distribution is maintained in a spreadsheet managed by the IRPL Property Team.</p>

			<ul style="list-style-type: none"> • Pre-Construction Condition Survey for Access via 3A Cambria Street, dated 24 June 2025. <p>Evidence has not been provided to determine whether copies of these Condition Survey Reports have been provided to the owners of the items surveyed.</p>	
I2S-01_NC-06	E161(c)	<p>Unexpected Finds An Unexpected Finds Procedure for Contamination must:</p> <p>(c) be reviewed by the Site Auditor and interim audit advice or a Section B Site Audit Statement provided certifying that the Unexpected Finds Procedure is appropriate;</p>	Evidence has not been provided to determine whether the Unexpected Finds Procedure for Contamination has been reviewed and endorsed by Site Auditor.	The Contamination Auditor review of the Unexpected Finds Procedure is included within the document in Appendix D (dated 3 December 2024). This document has been uploaded to the DPHI Project Website and is dated 16 December 2024 (Rev 0).
I2S-01_OFI-01	B8	A Complaints Register must be maintained recording information on all complaints received about the CSSI during the carrying out of any Work and for a minimum of 12 months following the completion of construction.	<p>Complaint #8474 has missing information in the Complaint Register such as date received, method received, and was not marked as closed, even though the information is available in the consultation manager system and it is marked as closed in the system.</p> <p>It is recommended to ensure that the Complaint Register is updated promptly and consistently with all required details, including closure status, to maintain alignment with the system and compliance requirements.</p>	Complaint #8474 has been updated in the John Holland complaints register for the Week Concluding 15 August 2025. The register is provided weekly to the ER.
I2S-01_OFI-02	E83	The construction of the CSSI must protect the integrity of riparian corridors in accordance with the <i>Guidelines for controlled activities on waterfront land: Riparian Corridors</i> (Department of Industry 2018) when carrying out Work within 40 meters of a watercourse.	During September possession works within 40 metres of a watercourse, the Project Daily Bulletin did not provide guidance/reminder for compliance.	Daily Bulletin content to require inclusion of riparian corridor protection details (as required) vs referencing the associated Site Environmental Plan.

			<p>It is recommended to include a specific note or compliance reminder in the Project Daily Bulletin whenever works occur within 40 metres of a watercourse to ensure awareness and adherence to riparian corridor protection requirements.</p>	
--	--	--	---	--