Inland Rail – Illabo to Stockinbingal

Assessment of Inland Rail & John Holland Group's Environmental System Compliance in accordance with SSI-9406 Conditions of Approval

Audit Reference:	A01535-04
Audit Organisation:	Inland Rail (Proponent) John Holland Group (Contractor)
Auditors:	Sanan Qasim – Lead Auditor Barbara Pater – Alternate Lead Auditor
Date of Audit:	22-24 April 2026
Draft Report Submitted:	5 June 2026
Final Report Submitted:	19 June 2026

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Distribution and Authorisation Record

Revision No.	Date	Issued to	Comments
Draft V1	5 June 2026	Patrick Thollar, IRPL	Initial draft for review
Final V0	19 June 2026	Patrick Thollar, IRPL	Final Report

This report has been prepared and reviewed in accordance with our quality control system.

This report has been prepared by:

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Date: 26 May 2026

Reviewed by:

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Date: 29 May 2026

Finalised and issued by:

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Date: 19 June 2026

Contents

Abbreviations and Definitions

Abbreviation	Definition
A2I	Albury to Illabo (adjacent Inland Rail project)
A2P	Albury to Parkes
ACVP	Aboriginal Cultural Values Plan
AHIMS	Aboriginal Heritage Information Management System
ALCAM	Australian Level Crossing Assessment Model
APZ	Asset Protection Zone
ARTC	Australian Rail Track Corporation
BMP	Biodiversity Management Sub-plan
BSA	Biodiversity Stewardship Agreement
BSMP	Biosecurity Management Sub-plan
BVBI	Bureau Veritas Buildings & Infrastructure
CA	Consistency Assessment
CCS	Community Communication Strategy
CEMF	Construction Environmental Management Framework
CEMP	Construction Environmental Management Plan
CMP	Construction Monitoring Program
CPESC	Certified Professional in Erosion and Sediment Control
CPHR	Centre for Planning, Heritage and Regulation (DCCEEW)
CRN	Country Rail Network
CSSI	Critical State Significant Infrastructure
CTTAMP	Construction Traffic, Transport and Access Management Sub-plan

Abbreviation	Definition
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPHI	Department of Planning, Housing and Infrastructure
DPI	Department of Primary Industries
DSI	Detailed Site Investigation
EIS	Environmental Impact Statement
EPA	Environment Protection Authority
EPL	Environment Protection Licence
FCS	Fauna Connectivity Strategy
FDVR	Flood Design Verification Report
HMP	Heritage Management Sub-plan
I2S	Illabo to Stockinbingal
IAPAR	Independent Audit Post Approval Requirements (DPIE, 2020)
IEA	Independent Environmental Audit
IPMP	Individual Property Management Plan
IRPL	Inland Rail Pty Ltd
JHG	John Holland Group
LALC	Local Aboriginal Land Council
MAF	Minor Ancillary Facility
NC	Non-Compliance
NVMP	Noise and Vibration Management Plan / Sub-plan
OBS	Observation
OFI	Opportunity for Improvement

Abbreviation	Definition
OOHW	Out-of-Hours Work
PCT	Plant Community Type
PESCP	Progressive Erosion and Sediment Control Plan
RAPs	Registered Aboriginal Parties
RFI	Request for Information
RFS	Rural Fire Service
ROL	Road Occupancy Licence
RtS	Response to Submissions
SAQP	Sampling and Analysis Quality Plan
SEMP	Site Establishment Management Plan
SIMP	Social Impact Management Plan
SSI	State Significant Infrastructure
SWMP	Soil and Water Management Plan / Sub-plan
TAFMP	Temporary Accommodation Facility Management Plan
TEC	Threatened Ecological Community
TfNSW	Transport for NSW
WAD	Works Authorisation Deed

1. Executive Summary

This Independent Environmental Audit (IEA) report presents the outcomes of the assessment of environmental controls established by Inland Rail (IRPL) and John Holland Group (JHG) against the requirements of the State Significant Infrastructure conditions SSI-9406 for the Inland Rail – Illabo to Stockinbingal project. The audit was conducted by Bureau Veritas Buildings and Infrastructure (formerly The APP Group) on 22-24 April 2026, covering the relevant conditions of Schedule 2 Parts A, B, C, D, E and Appendix A of SSI-9406.

This is the second IEA on the project, covering the review of environmental documentation, records, and a site inspection for the Inland Rail – Illabo to Stockinbingal project within 26-weeks of the initial construction audit, 26-27 November 2025. This report is based on the result of sampling and supplied documentation/records, as well as the site activities during the audit on 22-24 April 2026 and additional documentation as provided up to 21 May 2026.

As per the *Independent Audit Post Approval Requirements* (IAPAR 2020), the audit period is defined as 28 November 2025 to 23 April 2026.

Review of Compliance

A review of the responsibilities applicable to both IRPL and JHG was undertaken. The Project demonstrated good implementation of controls during the audit period to address environmental impacts. The following key strengths were noted:

- Strong implementation of erosion and sediment control measures, particularly around creek areas
- Multiple water carts operating along the alignment to manage dust observed during the site inspection
- Personnel assigned for polymer binder application to stabilise exposed surfaces
- Clear and consistent communication of environmental controls to staff through daily bulletins.

Findings

The independent environmental audit as carried out on 22-24 April 2026 comprised of a review of documents and records, interviews with key personnel from IRPL and JHG, and a site inspection. Seven (7) non-compliances were identified including those self-reported during the scope of the audit.

A summary of the findings identified during the audit are as follows:

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
NON-COMPLIANCES			
I2S-02_NC-01 (Self-Reported)	**C20:** The Biodiversity Management Sub-plan must be endorsed by a suitably qualified and experienced ecologist.	The non-compliance was self-reported by IRPL to DPHI via a non-compliance notification dated 2 April 2026, relating to flagging installation in accordance with the Biodiversity Management Plan (BMP) and the identification of reuse opportunities for woody debris.	Corrective actions implemented by IRPL and JHG include: • Review and reinstatement of vegetation flagging and exclusion fencing across the project

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
		During DPHI's site inspection on 19 March 2026, flagging was not installed at all locations, and where flagging was installed, it was not consistent with the requirements as per Section 8.3 of the Biodiversity Management Plan (BMP). Additionally, during DPHI's site inspection on 18 February 2026, opportunities for reuse of woody debris had not been clearly communicated to the contractor prior to mulching activities as per Section 8.7 of the BMP.	area in accordance with BMP Section 8.3, observed during the audit site inspection on 23 April 2026. • Update of the Biodiversity Management Plan currently under review by IRPL, to be subsequently endorsed by the ER prior to submission to DPHI for approval. • Confirmation of suitable locations for the reuse of timber and hollows within the Biodiversity Stewardship Agreement (BSA) boundary, supported by ongoing consultation with DPI Fisheries (correspondence dated 26 March 2026 and 2 April 2026) and CPHR (correspondence dated 11 March 2026). • Workforce communication reinforced through toolbox talks dated 23 April 2026 covering environmental controls and timber/hollow installation methodologies.

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
			This non-compliance remains **OPEN** pending finalisation and DPHI approval of the updated BMP. Close-out will be verified at the next Independent Environmental Audit.
I2S-02_NC-02 (Self-Reported)	**C21:** The Construction Traffic, Transport and Access Management Sub-plan (CTTAMP) must be consistent with any agreements with the relevant roads authority about the use and management of local roads.	The non-compliance was self-reported by IRPL to DPHI via a non-compliance notification dated 9 April 2026, relating to the use of access point not included in the Construction Traffic, Transport and Access Management Plan (CTTAMP). During project activities from January 2026, an ARTC access/egress point on the Olympic Highway (south of Billabong Creek) was utilised under a Road Occupation Licence (ROL) to support construction works. However, this access point was not included in the approved CTTAMP, as required under MCoA C21 and C26. The omission was identified following discussions with DPHI during the 25 March 2026 follow-up meeting and the 31 March 2026 Post Approvals meeting, and was subsequently confirmed in consultation with the Environmental Representative (ER) on 2 April 2026.	Corrective actions implemented by IRPL and JHG include: • Cessation of the use of the Olympic Highway access/egress point pending CTTAMP update and approval. • Update of the CTTAMP to Rev. 0.1 to incorporate the Olympic Highway access/egress point, submitted to Junee Shire Council (Aconex ref. IR2200-TRANSMIT-002509) and TfNSW (Aconex ref. IR2200-TRANSMIT-002507) on 13 April 2026 for review. This non-compliance remains **OPEN** pending Council/TfNSW review, ER endorsement and DPHI approval of CTTAMP Rev. 0.1. Close-out will be verified at the

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
			next Independent Environmental Audit.
I2S-02_NC-03 (Self-Reported)	**C26:** Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (as applicable and as identified in the CEMF approved under Condition C1). The CEMP and CEMP Sub-plans, as approved by the Planning 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 Planning Secretary or ER.	The non-compliance was self-reported by IRPL to DPHI via non-compliance notification dated 25 March 2026, relating to the gate 1 access not included in the Construction Traffic, Transport and Access Management Plan (CTTAMP). During the DPHI and CPHR site inspection on 19 March 2026, the use of Gate 1 (Warrens Lane) and the associated access track was identified as an unapproved access point in the approved CTTAMP. JHG confirmed use of the gate had commenced during the set-up for the February 2026 possession and was included in a Consistency Assessment (CA) on the Inland Rail website; however, the CTTAMP was not updated prior to the use of the gate and access track.	Corrective actions implemented by IRPL and JHG include: • Cessation of the use of Gate 1 (Warrens Lane), as confirmed in the project daily bulletin dated 23 April 2026 and verified during the audit site inspection on 23 April 2026. • Update of the CTTAMP to Rev. 0.1 to incorporate Gate 1 (Warrens Lane), submitted to Junee Shire Council (Aconex ref. IR2200-TRANSMIT-002509) and TfNSW (Aconex ref. IR2200-TRANSMIT-002507) on 13 April 2026 for review. This non-compliance remains **OPEN** pending Council/TfNSW review, ER endorsement and DPHI approval of CTTAMP Rev. 0.1. Close-out will be verified at the next Independent Environmental Audit.

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
I2S-02_NC-04	**E35:** A Box Gum Woodland Restoration Plan must be prepared by an ecologist with appropriate qualifications and experience in Box Gum Woodland restoration determined in consultation with BCS for the management of the restoration site identified in Condition A1(e) and A1(f) to ensure: a) in perpetuity management of existing Box Gum Woodland b) increase in the extent of Box Gum Woodland and c) improve connectivity within and across the site identified in Condition E34. The Box Gum Woodland Restoration Plan must be submitted to and approved by the Planning Secretary prior to the commencement of construction. The Box Gum Woodland Restoration Plan must be implemented and made publicly accessible	The Box Gum Woodland Restoration Plan was not uploaded to the project website as required by Condition E35, therefore triggering a non-compliance.	It is recommended that upload occur without delay to be fully compliant with Condition E35. This was rectified promptly, with the Box Gum Woodland Restoration Plan subsequently uploaded to the website as evidenced during closing meeting. This non-compliance is now considered **CLOSED**.
I2S-02_NC-05 (Self-Reported)	**E44: Connectivity Strategy** The draft Connectivity Strategy listed in Condition A1 must be finalised by a suitably qualified and experienced ecologist(s) with experience in fauna connectivity, fauna crossings and experimental design. The final Connectivity Strategy must be prepared in consultation with BCS and DPI Fisheries and submitted to the	The non-compliance was self-reported by IRPL to DPHI via non-compliance notification dated 7 April 2026, relating to the timely submission of Fauna Connectivity Strategy. The submission timeframe for the final Fauna Connectivity Strategy (FCS) was extended by DPHI to 9 December 2025 (ref. SSI-9406-PA-47) and subsequently to 28 February 2026 (ref. SSI-9406-PA-64). A third extension request	Corrective actions implemented by IRPL and JHG include: - Issuance of an amended Condition A9 Extension letter (IRPL ref. 6-0000-210-EEC-00-LT-0075) to DPHI on 7 April 2026, with justification, progress to date, and

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	Planning Secretary for approval prior to construction commencing.	submitted on 26 February 2026 was refused by DPHI on 2 April 2026. The final FCS was not submitted by the 28 February 2026 deadline as required by MCoA E44, and the further extension request was not accepted by DPHI.	future milestones for the FCS. - A revised submission timeframe of 2 September 2026 has been proposed in the amended A9 letter, supported by a program of progressive submissions of FCS components addressing the matters raised by DPHI and CPHR during the 19 March 2026 site visit and 25 March 2026 follow-up meeting. This non-compliance remains **OPEN** pending DPHI acceptance of the amended A9 letter and subsequent submission and approval of the final Fauna Connectivity Strategy. Close-out will be verified at the next Independent Environmental Audit.
I2S-02_NC-06	**E110:** The SIMP must include specific details of the commitments, programs and timing to secure and enhance positive social outcomes, and measures to minimise negative social and cumulative impacts associated with the CSSI. Reporting on the social impact performance of the CSSI, including	The SIMP Quarterly Report Q4 2025 was not uploaded to the project website as required by Condition E110, therefore triggering a non-compliance.	It is recommended that upload occur without delay to be fully compliant with Condition E110. This has been rectified, with the SIMP Quarterly Reports for Q4 2025 and Q1 2026 uploaded to the website as evidenced

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	monitoring results, must be reported quarterly with the results made publicly accessible in accordance with Condition B18.		during closing meeting. This non-compliance is now considered **CLOSED**.
I2S-02_NC-07	**E119:** The Employee Code of Conduct must be reviewed 12 months after approval and annually thereafter for the duration of construction. Updates to the Code of Conduct must be approved by the ER. The updated Code of Conduct must be made publicly available within one month of approval.	The Workforce Code of Conduct Rev. 0, dated 16 December 2024 was not reviewed within the annual timeframe as required by Condition E119.	It is recommended that JHG implement a process to ensure timeframes are continually met. Following the audit, JHG provided evidence that a review has now been undertaken. Sighted Workforce Code of Conduct Rev. 0.1, dated 27 April 2026, issued to IRPL for review via Aconex ref. JH-TRANSMIT-002759, dated 4 May 2026, with the ER still to approve the Code of Conduct. This non-compliance is now considered **CLOSED**.
OPPORTUNITIES FOR IMPROVEMENT			
I2S-02-OFI-01	**B18:** A website or webpage providing information in relation to the CSSI must be established before commencement of work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction.	The project website did not contain up to date documentation e.g., Temporary Accommodation Facility Management Plan – unsigned copy uploaded; unsigned copy of the Minor Ancillary Facility for Ironbong Road CH9380. In addition, the SIMP Quarterly Report (Q4 2025) was not uploaded within the required timeframe. This matter has been addressed as a non-	It is recommended that the project website is to be updated and continually maintained with current information and documentation.

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
		compliance under Condition E110 (refer to I2S-02_NC-06).	
I2S-02-OFI-02	**C26:** Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (as applicable and as identified in the CEMF approved under Condition C1). The CEMP and CEMP Sub-plans, as approved by the Planning 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 Planning Secretary or ER.	Actions raised in Soteria did not always have a photo showing what was required for close out. It is recommended that a photo of the required action be included for traceability purposes. Additionally, for both IRPL and JHG, actions were assigned against personnel that were on leave or offsite.	It is recommended to assign actions in Soteria appropriately. It is also recommended to investigate options to potentially assign to a group as opposed to individuals, or to re-assign actions to other available personnel to ensure timely close out.
I2S-02-OFI-03	**C36:** The results of the CMP(s) must be made publicly available in the form of a Construction Monitoring Report at the frequency identified in the relevant CMP.	Noise and vibration monitoring results are being reported quarterly; this misaligns to the frequency defined within the Construction Monitoring Program (6-monthly).	It is recommended that JHG review and confirm reporting requirements.
I2S-02-OFI-04	**E3:** Despite Conditions E1 and E2 work may be undertaken outside the hours specified in the following circumstances: (a) By approval or agreement, including: i. where different construction hours are permitted or required under an EPL in force in respect of the CSSI;	The Out-Of-Hours-Work (OOHW) Permit sample showed ER approval as marked which is not a project requirement, with the permit unsigned by JHG and the Conditions of Approval section left blank.	It is recommended to ensure all OOHW permits are completed accurately and in full.

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
I2S-02-OFI-05	**E25:** Impacts to plant community types and species credit species must not exceed those identified in the documents listed in Tables in SCHEDULE 1 and SCHEDULE 2 of APPENDIX C and the corresponding number and class of ecosystem and species credits as set out in the BAM Biodiversity Credit Report which forms part of Condition A1(c).	The register for vegetation clearing which included the % proportion tracked was showing incorrect calculations. Additionally, the Fauna Capture Register stated NOT RELEASED under the date released column.	It is recommended that the register be reviewed and updated to reflect accurate information and for traceability purposes.
I2S-02-OFI-06	**E145: Condition Surveys and Rectification** 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. 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.	During the review of Condition Survey Register, it was identified that some cells were marked as red and some entries left blank. Although evidence was presented demonstrating surveys were submitted prior to commencement of construction, the register itself does not record the date of submission of condition surveys to landowners and agencies.	It is recommended that the register be reviewed and updated to ensure all fields are completed accurately, submission statuses are clearly defined, and relevant submission dates are captured.
I2S-02-OFI-07	**E163:** 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;	The current waste tracking register does not distinguish between recycled and landfilled waste streams, limiting the ability to demonstrate waste diversion performance. While waste segregation bins were observed onsite during site inspection.	It is recommended that a monthly waste report be obtained from the contractor, clearly outlining the proportion of waste recycled versus landfilled, to effectively demonstrate waste performance and support sustainability

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	(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 in accordance with Condition E165.		reporting requirements, including ISC outcomes.
I2S-02-OFI-08	**E165:** 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 site meeting applicable legislation and regulations, or to any other place that can lawfully accept such waste.	No waste was exported or transported offsite under a Resource Recovery Order in relation to vegetation clearing activities. Instead, cleared vegetation (e.g. logs and mulch) is being reused onsite, indicating positive resource recovery practices. However, the project did not capture or maintain quantitative records relating to the volumes of logs and mulch reused onsite.	It is recommended that, for future vegetation clearing activities, processes are implemented to record the data of logs and mulch for reuse opportunities.

Table 1- Audit Findings

Further detail can be found under Appendix E (Audit Checklist).

Site Observations

Six (6) site observations were made as follows:

Ref	Observation
OBS-01	A concrete pour was in progress at the time of inspection; however, a spill kit was not initially available at the work area. Immediate corrective action was taken, and a spill kit was relocated nearby. Spill kits should be maintained at each active work area and relocated as activities progress to ensure immediate availability at all times.
OBS-02	Erosion and sediment control measures were implemented at Powder Horn Creek, with exposed areas covered using geofabric. Due to high winds, pins were removed from one section, resulting in temporary exposure of the area; this was immediately rectified. Ongoing inspection and maintenance of erosion and sediment control measures are recommended especially during the weather events.
OBS-03	One section of the sediment fence had been removed at the corner of the Gate 7B low sump area. Reinstatement is recommended to ensure adequate controls are in place.
OBS-04	SDS were not available at the chemical storage area in the Dirnaseer Compound. It is recommended that SDS be provided and kept accessible at the storage area.
OBS-05	A spill was identified from a generator located near the washdown area during the inspection. It was recommended that the internal spill incident management process be followed and that the area be cleaned immediately. Close-out evidence was presented at the closing meeting, confirming that incident INC-0112040 was raised in Soteria on 24 April 2026. Corrective actions included relocating an unused spill tray beneath the generator refuelling nozzle and completing the clean-up of the affected area, with photographic evidence sighted.
OBS-06	The concrete washout area for piling works was located adjacent to the BSA boundary and mulch stockpile. It is recommended that additional controls be implemented when washout areas are situated near sensitive areas to minimise environmental risk.

Table 2- Site Observations

Refer to the site photos included in Appendix G.

2. Introduction

2.1 Background

Inland Rail is a freight rail network spanning approximately 1,600 kilometres (km), connecting Melbourne and Brisbane through regional Victoria, New South Wales (NSW), and Queensland. The route consists of approximately 1,000 km of existing track, which will be enhanced and upgraded where necessary, along with 600 km of new track. Passing through 30 local government areas, Inland Rail is designed to accommodate double-stacked freight trains up to 1,800 metres in length and 6.5 m in height. The Illabo to Stockinbingal section of Inland Rail includes enhancements along approximately 185km of existing rail corridor from the Victoria-NSW border to Illabo in regional New South Wales.

The Inland Rail – Illabo to Stockinbingal project was classified as a State Significant Infrastructure (SSI) project by the NSW Department of Planning, Housing and Infrastructure (formerly the Department of Planning and Environment), requiring compliance with Schedule 2 of SSI-9406 Approval Conditions, approved October 2024. Inland Rail (IRPL) is the Proponent for the project with John Holland Group (JHG) appointed as principal contractor of works, commencing construction on 27 November 2025.

Independent Environmental Audit

IRPL engaged Bureau Veritas Buildings and Infrastructure (BVBI) to undertake this independent environmental audit on the Inland Rail – Illabo to Stockinbingal works. This was the second Independent Environmental Audit on the project and was undertaken in compliance with SSI-9406:

- **Condition A28** whereby: *"Proposed independent auditors must be agreed to in writing by the Planning Secretary before the commencement of an Independent Audit. This condition does not apply to the engagement of auditors required under Condition E106."*; and
- **Condition A29**: *"Independent Audits of the SSI must be conducted and carried out in accordance with the Independent Audit Post Approval Requirements (DPIE, 2020)."*

2.2 Project Details

Project Details	
Project Name	Inland Rail – Illabo to Stockinbingal
Project Application No.:	SSI-9406
Project Address:	Wallendoon Street, Cootamundra, NSW 2590
Project Phase:	Construction
Project Activity Summary:	The following is a summary of the works that were in progress at the time of audit: ▶ Clearing nearing completion ▶ Utility relocation works in progress ▶ General Earthworks in progress ▶ Water relocation works at 2 of 4 locations completed ▶ Piling at Run Boundary Creek underway

Project Details	
	▶ Piling completed at Dirnaseer Road

Table 3- Project Details

2.3 Audit Team

Details of BVBI (formerly The APP Group) independent environmental auditors as approved by the Department of Planning, Housing and Infrastructure (DPHI) for this audit are as follows:

Name	Company	Position	Certification
Sanan Qasim	BVBI	Lead Independent Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. 467153
Barbara Pater	BVBI	Lead Independent Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C424613

Table 4- Audit Team Qualifications

The auditor approval letter from DPHI for this audit is attached as Appendix C with the Independent Audit declaration forms included as Appendix D.

3. Audit Objectives and Scope

3.1 Audit Objectives

The objective of this audit was to undertake an independent environmental review of the project in compliance with SSI-9406 Approval Conditions A28 & A29, in accordance with the requirements for an independent audit methodology and independent audit report as defined in the *Independent Audit Post Approval Requirements* (IAPAR, 2020).

3.2 Audit Scope

The scope of this audit comprised a review of the project compliance with the applicable conditions of SSI-9406, including the following:

The scope of this audit comprised a review of the Project compliance with Schedule 2, SSI-9406 Conditions, Parts A, B, C, D, E and Appendix A, including the following:

- Review of implementation of management plans, including:
    - Construction Environmental Management Plan (CEMP),
    - Construction Noise and Vibration Management Sub-Plan (CNVMP), including the Construction Noise Monitoring Program,
    - Traffic, Transport and Access Management Sub-Plan (TTAMP), including Traffic Monitoring Program,
    - Biodiversity Management Plan (BMP),
    - Soil and Water Management Plan (SWMP), including Surface Water Monitoring Program,
    - Heritage Management Plan (HMP),

  - Flood Emergency Management Plan (FEMP),
  - Biosecurity Management Plan (BSMP),
- Community Communications Strategy (CCS),
- Documents as listed under Section 5 of this report,
- Site inspection as conducted on 23 April 2026,
- Review of the environmental performance on the project,
- Review of environmental records,
- Interviews with site personnel, and
- Consultation with stakeholders.

3.3 Audit Period

This is the second independent environmental audit on the project, covering the review of environmental documentation, records, and a site inspection for Inland Rail – Illabo to Stockinbingal project within 26-weeks of the initial construction audit, 26-27 November 2025. This report is based on the result of sampling and supplied documentation/records, as well as the site activities during the audit on 22-24 April 2026 and additional documentation as provided up to 21 May 2026.

In accordance with the IAPAR 2020, the audit period is defined as 28 November 2025 to 23 April 2026.

4. Audit Methodology

4.1 Approval of Auditors

Letter from the Planning Secretary agreeing to the auditors is included under Appendix C.

4.2 Audit Scope Development

BVBI developed the audit scope and checklists based on the infrastructure requirements set out in the SSI-9406 Approval Conditions. Refer to Appendix E of this report. As a requirement of the IAPAR 2020 guidelines, this audit was undertaken at an interval of no greater than 26-weeks from the previous construction audit. In accordance with Section 3.2 of the IAPAR 2020 guidelines, consultation for the scope of the audit was sought from the Department of Planning, Housing and Infrastructure (DPHI); there was a request from DPHI to focus on specific areas as well as consult with other stakeholders – refer to Section 4.6 and Appendix F of this report.

4.3 Audit Process

The following methodology was applied to this audit with the Audit Agenda included under Appendix A.

4.3.1 Opening Meeting

An opening meeting was held as follows:

Project	Date and time	Attendees
Inland Rail – Illabo to Stockinbingal	22 April 2026, 2:00pm	IRPL & JHG representatives

Table 5- Opening Meeting

Key items were discussed during the opening meeting:

- Confirmation of the purpose and scope of the audit,
- Overview of the Project and status of the works,
- Occurrence of environmental incidents and non-compliances, as applicable,
- Overview of the audit process in accordance with the SSI-9406 Schedule 2 Approval Conditions, Project Staging Report, the *Independent Audit Post Approval Requirements* (IAPAR 2020), and the methodology to be applied, and
- Confirmation of resources required to undertake the audit.

For a list of attendees to the opening meeting, refer to the Audit Attendance Sheet included as part of Appendix B.

4.3.2 Conduct of Audit

Audit activities included the following:

- Review of the project documentation (CEMP, Sub-Plans and monitoring programs) and records to verify compliance with the SSI-9406 Approval Conditions,
- Conduct of a site inspection to review implementation of mitigation measures and environmental controls,
- Conduct of the audit using the checklist based on the SSI-9406 Approval Conditions,
- Onsite interviews with Inland Rail and John Holland personnel to verify compliance with the SSI-9406 Approval Conditions. A list of personnel is included under Section 3.4,
- Review of records provided as evidence of compliance, and
- Discussion of any observations (both positive and negative), any identified findings, and observations/actions noted during site inspections.

4.3.3 Closing Meeting

A closing meeting was held as follows:

Project	Date and time	Attendees	Comments
Inland Rail – Illabo to Stockinbingal	28 April 2026, 12:00pm	IRPL, JHG	The auditor acknowledged the hospitality of all parties during the conduct of the audit.

Table 6- Closing Meeting

For a list of attendees to the closing meeting, refer to the Audit Attendance Sheet included as part of Appendix B.

4.4 Interviewed Persons

Name and position of persons interviewed:

Name	Organisation	Position
Patrick Thollar	IRPL	Facilitator
Rachael Labruyere	IRPL	Environmental & Sustainability Manager
Holly Gray	IRPL	Stakeholder Advisor
Harry Mercer	IRPL	Project Director
Aisling Twomey	IRPL	Level Crossing Manager
Susan Ray	IRPL	Principal Environmental Advisor
Justin McCarthy	JHG	Project Director
Daniel Lidbetter	JHG	Environmental Manager
Luke Ryalls	IRPL	Senior Environmental Manager
Daniel Lumby	IRPL	Senior Environmental Advisor
Awais Sharif	IRPL	Environmental Advisor
Tess Anastakis	JHG	HSC Coordinator - Environment
Scott Fryer	JHG	HSC Coordinator - Environment

Table 7- Personnel Interviewed

4.5 Site Inspection

A site inspection was carried out on the audit day as follows:

Project	Date and time	Attendees	Comments
Inland Rail – Illabo to Stockinbingal	23 April 2026, 7:30am	IRPL, JHG	6 x observations made

Table 8- Site Inspection details

Refer to details of the inspection under Section 6.4 of this report and site photos included under Appendix G.

4.6 Consultation

Consultation with the Department of Planning, Housing and Infrastructure (DPHI) was sent on 10 & 15 April 2026 in advance of the audit to request feedback on the project as per the *Independent Audit Post Approval Requirements* (IAPAR 2020) Section 3.2.

DPHI responded on 16 April 2026, requesting that the following aspects be addressed, including consultation with the listed stakeholders.

4.6.1 BVBI Response

BVBI have addressed consultation comments as follows:

Request	Response
Address all conditions required under the Approval and the IAPAR 2020	Compliance was reviewed in accordance with the SSI-9406 Schedule 2 Approval Conditions. Seven (7) non-compliances (including self-reported non-compliances) and eight (8) improvement opportunities were identified as detailed under Section 6.8. Details of compliance are contained within the audit checklist under Appendix E.
Address/review the following aspects: • Details of the works that have been undertaken so far at the Project. • Ensure you assess compliance with all conditions of approval applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of approval, including management plans. • Review the environmental performance of the development including actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary. • A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate and being implemented as required specifically in relation to biodiversity and biosecurity, ERSED, traffic, and restoration of the Gum Flat BSA site. • Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc and any	Works undertaken since the previous audit, environmental performance, incidents, non-compliances and complaints are detailed under Section 2.2 (Project Details), Section 6.1 (Assessment of Compliance) and Section 6.2 (Notices, Complaints, Incidents & Non-Compliances) of this report. Compliance with the SSI-9406 Schedule 2 Approval Conditions (Parts A, B, C, D, E and Appendix A) applicable to the construction phase has been reviewed under Appendix E (Audit Checklist), with results summarised in Section 6.8. The actual environmental impacts have been compared qualitatively against the predicted impacts of the EIS and RtS under Section 6.6, with the Project assessed to be generally consistent with the approved documents and within the approved construction boundary. The Construction Environmental Management Plan (CEMP, Rev. 2 dated 10 September 2025) and supporting CEMP Sub-Plans (Biodiversity, Biosecurity, Soil and Water, Noise and Vibration, Heritage, Traffic Transport and Access, and Flood Emergency Management) were reviewed and confirmed to be implemented during the audit period (Section 6.5). Implementation of the Box Gum Woodland Restoration Plan (Rev. 2 dated 13 October 2025) is being progressed, with the Biodiversity Stewardship Agreement (BSA) application submitted to DPHI on 29 January 2026 (ref. SSI-9406-PA-72). Cleared timber and hollows are being retained on site for reuse within the BSA boundary and as fauna furniture, with consultation undertaken with DPI Fisheries (correspondence dated 26 March 2026 and 2 April 2026 as sighted). Notification requirements under Conditions A34 and A35 have been actioned. One reportable incident occurred during the audit period - the felling of a Superb Parrot habitat tree at Dirnaseer Road on 2 December 2025. The incident was verbally notified to DPHI on 3 December 2025 and formally notified via Aconex ref. IR2200-

Request	Response
other notifications or reporting to other agencies or community. • Ensuring all environmental controls have been installed, maintained, and are being used in a fit and proper manner. • Erosion and sediment management and maintenance across the Project is being undertaken and adequate. Specifically, around sensitive environment such as water ways and whether surface water dirty/clean water is being managed appropriately. • Work Hours are being adhered to, specifically regarding noise and vibration impacts. • Pre-clearance works/measures and flagging sensitive areas, have been undertaken especially in relation to exclusions zones regarding biodiversity and heritage matters. • Review the status of the non-compliances identified in the previous audit report and whether they have been actioned and closed out • Traffic Management specifically the requirements regarding access routes/gates in and out of the project and whether they have approval and consistent with approved management plans. • Storage of chemicals, fuels and oils is appropriate.	RECCO-000078 on 5 December 2025 (post-approval receipt SSI-9406-PA-67). The three juvenile parrots were rescued uninjured and released on 11 December 2025. The Investigation Report was submitted to DPHI on 4 February 2026 in response to RFI ref. SSI-9406-PA-67. All four (4) previous audit non-compliances (I2S-01_NC-01 to I2S-01_NC-04) and one (1) previous audit opportunity for improvement (I2S-01_OFI-01) have been verified as CLOSED – refer to Section 6.3. Environmental controls were observed during the site inspection on 23 April 2026 (refer to Section 6.4 and Appendix G). Erosion and sediment controls including geofabric covering of batters, polymer binder stabilisation, rock filter dams, mulch bunds, sediment fences, rumble grids, turkey's nest sediment basins, and vehicle washdown areas were observed in place along the alignment and at Powder Horn Creek, Run Boundary Creek and the Dirnaseer Compound. Progressive Erosion and Sediment Control Plans have been prepared by a Certified Professional in Erosion and Sediment Control (CPESC) for Powder Horn Creek and Ironbong Road. Pre and post-rainfall inspections (e.g. INS-0126468 dated 29 March 2026 for a 35 mm rainfall event) confirmed controls remained effective with no surface water runoff observed. Construction work hours were reviewed under Conditions E1, E2 and E3. No emergency Out-Of-Hours Works (OOHW) occurred during the audit period. OOHW Permits sighted included PER/I2S/00327 (Temporary Water Supply night works 25–26 February 2026), PER/I2S/00335 (Ulandra Creek drilling 15 February 2026), PER/I2S/00338 (February possession works), and PER/I2S/00339 (haul road treatment). Attended noise monitoring on 1 November 2025 during the possession recorded no exceedances. Quarterly Monitoring Reports (ref. 6-0019-220-EEC-00-RP-0009 Rev. A) record no noise exceedances during the audit period. An Opportunity for Improvement (ref I2S-02_OFI-04) was raised regarding completeness of OOHW Permit documentation. Pre-clearance and flagging arrangements for biodiversity exclusion zones were reviewed under the Biodiversity Management Plan (BMP Rev. 0 dated 1 September 2025). Pre-clearance surveys were completed by the project Ecologist (OzArk), with habitat trees marked with blue paint and flagging installed around sensitive areas including creek lines, as observed during the site inspection. A self-reported non-compliance (recorded as part of this audit as I2S-02_NC-01) was raised in relation to flagging not being installed at all locations during the 19

Request	Response
	March 2026 site inspection by DPHI and inconsistencies with the requirements of BMP Section 8.3. Following the inspection, flagging was reinstated and reinforced through toolbox talks dated 23 April 2026. Heritage exclusion arrangements were reviewed under the Heritage Management Plan (Rev. 0 dated 6 August 2025); identified significant scar trees are located outside the project boundary and salvage excavations across Zones 1 and 2 have been completed by Apex Archaeology. Traffic management was reviewed under the Construction Traffic, Transport and Access Management Plan (CTTAMP, Rev. 1 dated 7 November 2025). Two non-compliances were self-reported in relation to the use of an ARTC access/egress point on the Olympic Highway south of Billabong Creek (not included in the approved CTTAMP) (refer to I2S-02_NC-02), and in relation to the use of Gate 1 (Warrens Lane) and access track prior to the CTTAMP being updated (Refer to I2S-02_NC-03). The CTTAMP has since been updated to Rev. 0.1 and submitted to Junee Shire Council (Aconex ref. IR2200-TRANSMIT-002509) and Transport for NSW (Aconex ref. IR2200-TRANSMIT-002507) on 13 April 2026 for review prior to ER endorsement and DPHI approval. Use of Gate 1 has been ceased pending CTTAMP approval, as captured in the project daily bulletin dated 23 April 2026. Chemical, fuel and oil storage was reviewed during the site inspection. Spill kits were observed at fixed locations and a concrete washout tray was sighted. Observation OBS-04 was raised at the Dirnaseer Compound chemical storage area as Safety Data Sheets (SDS) were not initially available; this was promptly rectified. Observation OBS-05 was raised in relation to a minor spill from a generator near the washdown area; the project subsequently raised incident INC-0112040 in Soteria on 24 April 2026, relocated the spill tray beneath the generator refuelling nozzle, and completed clean-up of the affected area, with photographic close-out evidence sighted.
Consultation with Local Councils	• Consultation with Cootamundra-Gundagai Regional Council was sent on 10 April 2026; however, no response was received. • Consultation with Junee Shire Council was sent on 10 April 2026; however, no response was received.
Consultation with Heritage NSW	Consultation with Heritage NSW was sent on 10 April 2026. The response was received on 16 April 2026, stated "*Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of*

Request	**Response**
	Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed". Heritage conditions were reviewed under the Heritage Management Plan (HMP, Rev. 0 dated 6 August 2025), the Aboriginal Cultural Values Plan (ACVP, approved by DPHI on 23 February 2026, ref. SSI-9406-PA-59) and the Aboriginal Community and Stakeholder Engagement Strategy (Rev. 0 dated 29 July 2025). Salvage excavations by Apex Archaeology (Apex) are now complete across Zones 1 and 2, with 1,220 and 85 lithic items recovered respectively (letters from Apex dated 17 December 2025 and 28 January 2026). Consultation with the Registered Aboriginal Parties (RAPs) is ongoing, evidenced by the AOHC Heritage Consultant email dated 22 January 2026 confirming the ACVP Consultation Log has been updated and circulated to RAPs. A second Wiradjuri Language Session was conducted on 1 April 2026 to build workforce awareness. No unexpected Aboriginal or non-Aboriginal heritage finds occurred during the audit period. In relation to the AHIMS register, the AHIMS Web Services Report (Excel) dated 2 December 2025 was provided, confirming entries from IRPL for Bethungra Crown Land, Ironbong Road, Olympic Highway and Burley Griffin Way.
Consultation with Environment Protection Authority	Consultation with the NSW EPA was sent on 10 April 2026. The response received on 14 April 2026, stated "*The following aspects be investigated as part of the Audit:* - *Whether proposed noise mitigation measures are adequate to ensure compliance* - *Whether proposed stormwater and wastewater control measures are adequate to ensure compliance* - *Whether the proposed development ensures waste management is conducted in a lawful manner."* Noise mitigation measures were reviewed under the Noise and Vibration Management Plan (NVMP, Rev. 0 dated 1 August 2025) and the Out-of-Hours Work Protocol (Rev. E dated 17 June 2025, prepared in consultation with the EPA as documented in the OOHW Protocol Section 1.3). Attended noise monitoring undertaken on 1 November 2025 during the October possession works recorded no exceedances. The Quarterly Monitoring Report (6-0019-220-EEC-00-RP-

Request	Response
	0009 Rev. A) submitted on 16 April 2026 confirmed no noise exceedances during the reporting period. Calibration of noise monitors was verified (Calibration Certificates C26214-V1, C26215-V1 and C26216-V1 dated 20 March 2026). Stormwater and wastewater controls were reviewed under the Soil and Water Management Plan (Rev. 0 dated 4 August 2025) and observed during the site inspection. Geofabric, polymer binder, sediment fences, rock filter dams, mulch bunds, rumble grids and turkey's nest basins were observed across the alignment and at Powder Horn Creek, Run Boundary Creek, the Dirnaseer Site Compound and Ironbong Road. Progressive Erosion and Sediment Control Plans have been prepared by a CPESC. JHG confirmed during the audit interview that there have been no discharges to date. All construction water is contained and reused on site for dust suppression. An EPL variation application to include discharge points is in progress. Six site observations (OBS-01 to OBS-06) were raised relating to erosion and sediment control and spill management, all of which have been promptly addressed (refer to Section 6.4 and Appendix G). Waste management was reviewed under the Waste Management Plan (Rev. 0 dated 14 August 2025). Cleanaway, an EPA licensed contractor (Licence No. 12945), is engaged for waste and recycling services. No cleared vegetation has been taken off site during the audit period. All material is being retained for reuse including for creek bank stabilisation, fauna furniture and currently stored within the BSA. Two Opportunities for Improvement (I2S-02_OFI-07 and I2S-02_OFI-08) were raised in relation to capturing waste diversion data and reuse data for logs and mulch.
Consultation with NSW DCCEEW CPHR	Consultation with the NSW DCCEEW (CPHR) was sent on 10 & 16 April 2026. A response from CPHR was received on 20 April 2026 with the request to focus on condition E46, Clearing Procedure in BMP, Fauna Rescue and Release Procedure and Flood Design Verification Report (FDVR). Condition E46 was reviewed in conjunction with the self-reported non-compliance (recorded as part of the audit as I2S-02_NC-01 as raised under Condition C20). IRPL consultation with DPI Fisheries has been ongoing, with initial discussions documented in meeting minutes dated March 2025 and follow-up emails dated 25 February 2025, 26 March 2026 and 2 April 2026. Email correspondence to CPHR dated 11 March 2026 was sighted confirming that felled timber components will be

Request	**Response**
	repurposed as fauna furniture within bridges and creek crossings. No cleared vegetation has been taken off site. All material is being reused within the Project, including for creek bank stabilisation and fauna habitat at watercourse crossings. The Clearing Procedure (BMP Appendix B) and Fauna Rescue and Release Procedure (BMP Appendix C) were reviewed and verified to be implemented. Pre-clearance surveys are completed by the project Ecologist (OzArk) and clearing permits issued (e.g. PER/I2S/00161 for the period 24 November 2025 to 31 December 2025). The Superb Parrot incident on 2 December 2025 demonstrated implementation of the Unexpected and Incidental Finds Procedure, with the parrots safely contained, assessed by a veterinarian, and successfully released on 11 December 2025 by a licensed wildlife carer. The BMP is currently under review by the ER and will be submitted to DPHI following endorsement. The FDVR (Rev. C dated 20 February 2026) is currently in draft and under review by DPHI. Sighted RFI request from DPHI dated 30 March 2026 regarding low risk culverts and the Project's response dated 9 April 2026 (submitted 13 April 2026). This condition (E64) is not yet triggered as the FDVR has not been finalised. Ongoing discussions with DPHI are occurring through weekly meetings regarding the FDVR and the Erosion Threshold Velocity (ETV) Report.
Consultation with Water Group of DCCEEW	Consultation with Water Group of DCCEEW was sent on 16 April 2026. The response was received on 20 April 2026 with the focus on specific elements relating to Water Management Plans, water supply and usage and annual reporting. Water management was reviewed under the Soil and Water Management Plan (Rev. 0 dated 4 August 2025). Goldenfields Water is the water supplier; water is supplied via mains connection, metered, and no Water Access Licence requirements are triggered. JHG confirmed during the audit interview that there has been no water extraction occurring, no overtopping from rain events, and that the Water Reuse Strategy contains water supply requirements. The Trigger Action Response Plan (TARP) has not yet been triggered. Annual reporting timing has not yet been triggered. The Project is currently in the construction phase. Compliance with Condition E76 was reviewed and confirmed. All water is contained and reused on site, with no discharge points operating during the audit period.

Request	Response
Consultation with Transport for NSW	Consultation with TfNSW was sent on 10 April 2026; however, no response was received.
Consultation with ER	Consultation with the ER was sent on 10 April 2026. The response was received on 10 April 2026 with a request to focus on the following: - clearing, connectivity strategy, protection of biodiversity no-go zones - construction stormwater management and dust - use of approved / unapproved access gates. Clearing activities were reviewed under the BMP and Clearing Procedure. Pre-clearance surveys have been completed by the project Ecologist (OzArk) and clearing permits issued (refer to the Superb Parrot incident management under Condition A34). Implementation was observed during the site inspection on 23 April 2026 with habitat trees flagged with blue paint at Run Boundary Creek and timber stockpiles retained for reuse within the BSA. The Fauna Connectivity Strategy (FCS) remains in draft (Rev. G dated 25 February 2026). The submission timeframe was extended to 9 December 2025 (ref. SSI-9406-PA-47), subsequently extended to 28 February 2026 (ref. SSI-9406-PA-64), with a further extension request refused by DPHI on 2 April 2026; therefore, a self-reported non-compliance (recorded as part of the audit as I2S-02_NC-05) was notified. An amended Condition A9 letter was submitted by IRPL to DPHI on 7 April 2026 proposing a revised submission date of 2 September 2026. Protection of biodiversity no-go zones, construction stormwater management and dust control were observed during the site inspection on 23 April 2026. Multiple water carts were observed operating across the alignment for dust suppression – no dust was observed at the time of inspection. Erosion and sediment controls including geofabric, polymer binder, sediment fences, rock filter dams and rumble grids were observed in place. Six (6) site observations were raised relating to these areas (OBS-01 to OBS-06) and have been promptly addressed (refer to Section 6.4 and Appendix G). The use of approved and unapproved access gates was assessed in conjunction with two self-reported non-compliances recorded during the audit: • refer to I2S-02_NC-02 (Olympic Highway Access)

Request	Response
	- refer to I2S-02_NC-03 (Gate 1 Warrens Lane) The CTTAMP has been updated and is currently under review by Junee Council, TfNSW and the ER prior to submission to DPHI for approval. Use of Gate 1 has ceased pending the updated CTTAMP being approved, as confirmed in the project daily bulletin dated 23 April 2026 and observed during the site inspection.

Table 9- Consultation comments

Refer to Appendix F for a copy of the consultation.

4.7 Audit Compliance Status Descriptors

The following audit criteria were used for the rating of audit findings.

Rating	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 at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Table 10 - Audit Criteria

In addition to the above descriptors, there was the option to raise Opportunities of Improvement (OFI) during this audit.

5. Document Review

- Inland Rail Illabo to Stockinbingal Project Staging Report, Document No. 5-0019-220-EEC-00-RP-0021, Rev. 0, dated 8 September 2025
- Community Communication Strategy (CCS) – I2S, Rev. 3, dated 8 October 2025
- Construction Environmental Management Plan (CEMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0037, Rev. 2, dated 10 September 2025
- Site Establishment Management Plan (SEMP) (reviewed during initial audit; now superseded by TAFMP for operational phase)
- Biodiversity Management Plan (BMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0055, Rev. 0, dated 1 September 2025
- Construction Traffic, Transport and Access Management Plan (CTTAMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0056, Rev. 1, dated 7 November 2025
- Soil and Water Management Plan (SWMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0058, Rev. 0, dated 4 August 2025
- Heritage Management Plan (HMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0059, Rev. 0, dated 6 August 2025
- Flood Emergency Management Plan by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0060, Rev. 0, dated 5 August 2025
- Biosecurity Management Plan by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0061, Rev. 0, dated 28 July 2025
- Noise and Vibration Management Plan (NVMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0028, Rev. 0, dated 1 August 2025
- Temporary Accommodation Facility Management Plan (TAFMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0051, Rev. 0, dated 8 August 2025
- Waste Management Plan by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0071, Rev. 0, dated 14 August 2025
- Social Impact Management Plan (SIMP) by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0064, Rev. 1, dated 30 October 2025
- Social Impact Management Plan (SIMP) – Revised draft Rev. 1.1, dated 19 April 2026 (transmitted to IRPL via Aconex ref. JH-TRANSMIT-002681 on 21 April 2026)
- Bushfire Emergency Plan by John Holland Group, Document No. 5-0019-220-PMA-00-PL-0065, Rev. 0, dated 1 October 2025
- Box Gum Woodland Restoration Plan prepared by WSP, Rev. 2, dated 13 October 2025
- Aboriginal Cultural Values Plan (ACVP) prepared by Navin Officer Heritage Consultants, Document No. 5-0019-220-PMA-00-PL-0067, Rev. 0, dated 23 January 2026
- Visual and Landscape Impact Mitigation Plan prepared by Conybeare Morrison International, Document No. 5-0019-220-PEN-L5-PL-0001_B, Rev. B, dated 20 March 2026
- Operational Erosion Mitigation and Monitoring Plan (OEMMP), Document No. 6-0019-220-IHY-D9-PJ-0001, Rev. 0, dated 30 January 2026
- Unexpected and Incidental Finds Protocol by John Holland Group, Document No. 5-0019-220-PES-00-PR-0001, Rev. 0, dated 16 December 2024 (including Appendix C – Unexpected Finds Procedure – Contamination)

- Out-of-Hours Work (OOHW) Protocol by John Holland Group, Document No. 5-0019-220-EEC-00-PO-0001, Rev. E, dated 17 June 2025
- Aboriginal Community and Stakeholder Engagement Strategy by John Holland Group, Document No. 5-0019-220-PMA-00-ST-0001, Rev. 0, dated 29 July 2025
- Water Re-use Strategy by John Holland Group, Rev. 0, dated 18 September 2025
- Revised Draft Connectivity Strategy (Fauna Connectivity Strategy) prepared by WSP, Document No. 5-0000-220-PMA-00-PL-0000, Rev. G, dated 25 February 2026
- Flood Design Consultation Protocol by John Holland Group, Document No. 5-0019-220-PMA-00-PO-0001, Rev. 1, dated 14 November 2025
- Sampling and Analysis Quality Plan (SAQP) prepared by David McMahon, Rev. V3, dated 30 July 2025
- Workforce Code of Conduct by John Holland Group, Rev. 0, dated 16 December 2024
- Workforce Code of Conduct by John Holland Group, Rev. 0.1, dated 27 April 2026 (issued to IRPL via Aconex ref. JH-TRANSMIT-002759 on 4 May 2026)
- Additional Aboriginal Archaeological Survey and Test Excavation Methodology prepared by Apex Archaeology, Rev. 0, dated 29 April 2025
- Aboriginal Archaeological Salvage Excavation Methodology prepared by Apex Archaeology, Rev. 0 final, dated 13 November 2025
- Methods for Erosion Threshold Velocity (ETV) – Method 1, Rev. A, dated 1 May 2025
- Methods for Erosion Threshold Velocity (ETV) – Method 2, Rev. A, dated 1 May 2025
- Flood Design Verification Report (FDVR), Document No. 6-0019-220-IHY-00-RP-0002, Rev. C, dated 20 February 2026 (issued for review)
- Erosion Threshold Velocity Report prepared by Landloch, Document No. 5-0019-220-PEN-00-RP-0024, Rev. 2, dated 12 April 2026
- Flood Emergency Response Plan (FERP), Document No. 5-0019-220-IHY-00-RP-0001, Rev. 0, dated 30 January 2026
- Flood Emergency Risks Beyond the Rail Corridor Report, Document No. 5-0019-220-IHY-00-RP-0002, Rev. 0, dated 30 January 2026
- Public Level Crossing Treatment Report, Document No. 5-0019-220-CXR-00-RP-0002, Rev. 0, dated 1 April 2026
- Private Level Crossing Treatment Report, Document No. 5-0019-220-CXR-00-RP-0001, Rev. 0, dated 20 April 2026
- Assessment of Unsurveyed Area Report prepared by WSP, Rev. 2, dated 28 July 2025
- Baseline Bird Monitoring Report prepared by WSP, Document No. 2-0001-220-ESV-00-RP-0010, Rev. 1, dated 25 February 2026
- Squirrel Glider Baseline Surveys Report prepared by WSP, Rev. B, dated 29 July 2025
- Pre-clearance Report prepared by OzArk, dated 26 September 2025
- Quarterly Monitoring Report (Noise) by John Holland Group, Document No. 6-0019-220-EEC-00-RP-0009, Rev. A (submitted to IRPL via Aconex ref. JH-TRANSMIT-002651, dated 16 April 2026)
- Social Impact Management Plan Quarterly Progress Report Q4 2025, Document No. 6-0019-220-ESP-00-RP-0001, Rev. 0, dated 29 January 2026
- Social Impact Management Plan Quarterly Progress Report Q1 2026, Document No. 6-0019-220-ESP-00-RP-0002, Rev. 0, dated 24 April 2026
- Illabo to Stockinbingal Road Condition (Dilapidation) Report, Rev. B, dated 29 July 2025

- Pre-Construction Condition Survey – Billabong Creek, dated 3 July 2025
- Pre-Construction Condition Survey – Goldenfields Water Reservoir, dated 2 July 2025
- Pre-Construction Condition Survey – NBN Tower, dated 2 July 2025
- Pre-Construction Condition Survey – 2 West Street, dated 25 June 2025
- Pre-Construction Condition Survey – Access via 3A Cambria Street, dated 24 June 2025
- Pre-Construction Road Safety Audit (Junee Shire Council) prepared by Civlink Consulting, Rev. 00, dated 23 May 2025
- Credit Retired Report, dated 14 August 2025 (with payment confirmation into the Biodiversity Conservation Fund dated 21 August 2025; submitted to DPHI 28 August 2025)
- Memorandum – E24 and E33(d) Compliance, dated 18 November 2025
- Erosion and Sediment Control Audit Report prepared by Treestone Environmental, dated 10 April 2026
- Progressive Erosion and Sediment Control Plan – Billabong Creek, Rev. C, dated 11 April 2026 (CPESC 7317 approved)
- Progressive Erosion and Sediment Control Plan – Ironbong Road, Rev. A, dated 1 April 2026 (CPESC 7317 approved)
- AHIMS Web Services Report (Excel), dated 2 December 2025
- Interim Audit Advice No. 3 for DSI AEC 11 (review of DSI Rev. 4 prepared by McMahon), dated 11 March 2026
- Dam Register, Document No. 5-0019-220-IHY-00-RG-0001_A, last updated 5 November 2025
- I2S Vegetation Clearing Tracker (cumulative clearing data, March 2026)
- I2S KRA Tracker (IS Rating tracking spreadsheet)
- Technical Memorandum by KBR – Hydrological Model, dated 16 February 2026
- Technical Memorandum by KBR – Peer Review (Conditions E51, E52), dated 26 February 2026
- Technical Memorandum – Compliance Criteria to Minister's Conditions of Approval E82, dated 10 July 2025
- Billabong Isobel Creek Drawing ref. 5-0019-220-SBD-H6-DR-006.DWG, Rev. 0, dated 12 September 2025
- Apex Archaeology Letter confirming completion of salvage excavation within Zone 1, dated 17 December 2025
- Apex Archaeology Letter confirming completion of salvage excavation within Zone 2, dated 28 January 2026
- Letter from CPHR confirming satisfaction with memo submitted 24 October 2025, dated 10 November 2025
- Consistency Assessment (Minor) – Construction Gates Project Wide, Document No. 6-0019-220-EEC-00-SD-0001, Rev. 0, dated 6 February 2026 (also Rev. 0 dated 25 March 2026)
- Consistency Assessment (Minor) – Grogan Road Utility Access Track, Document No. 6-0019-220-EEC-00-RP-0006, Rev. 0, dated 23 February 2026 (also Rev. 0 dated 25 March 2026)
- Consistency Assessment (Minor) – Combined Services Route Works (referenced in December 2025 ER Monthly Report)
- Consistency Assessment (Minor) – Dudauman Rd RMAR Access (referenced in December 2025 ER Monthly Report)
- Consistency Assessment (Minor) – Rail Unloading Activities (referenced in December 2025 ER Monthly Report)

- Minor Ancillary Facility – Warrens Lane, Document No. 5-0019-220-EEC-00-RP-0012, Rev. 0, dated 27 August 2025
- Minor Ancillary Facility – Grogan Rd, Document No. 5-0019-220-EEC-00-RP-0012, Rev. 0, dated 30 May 2025
- Minor Ancillary Facility – Corner of Old Cootamundra Road and Dudauman Road, Document No. 5-0019-220-EEC-00-RP-0001, Rev. 0, dated 2 June 2025
- Minor Ancillary Facility – CH9380 Ironbong Rd, Document No. 5-0019-220-EEC-00-RP-0016, Rev. 0, dated 29 September 2025
- Minor Ancillary Facility – CH11950 (Ironbong Road), Document No. 5-0019-220-EEC-00-RP-0003, Rev. 0, dated 10 November 2025
- Minor Ancillary Facility – CH37500 Harold Park House (Burley Griffin Way), Document No. 5-0019-220-EEC-00-RP-0004, dated 10 November 2025
- Minor Ancillary Facility – CH18500 (Dirnaseer Road), Document No. 5-0019-220-EEC-00-RP-0013, dated 6 August 2025
- Clearing Permit PER/I2S/00161 for the duration 24 November 2025 to 31 December 2025
- Clearing Permit CP015, PPW No. PER/I2S/00314 for the duration 2 February 2026 to 6 April 2026 (Section 1 and Section 2)
- Clearing Permit CP012, PPW No. PER/I2S/00277 for the duration 27 January 2026 to 27 April 2026 (Section 5 and Section 6)
- Subject to EPL – OOHW Permit PER/I2S/00327, Permit No. 008, dated 5 February 2026 (Temporary Water Supply – Night Works)
- Subject to EPL – OOHW Permit PER/I2S/00335, dated 10 February 2026 (Ulandra Creek drilling works)
- OOHW Permit PER/I2S/00338, Permit No. 0010, dated 12 February 2026 (February possession works)
- OOHW Permit PER/I2S/00339, Permit No. 0011, dated 22 March 2026 (haul road treatment)
- Section 138 Approval from Junee Council for Warrens Lane, dated 14 April 2026
- Section 68 Approval from Cootamundra-Gundagai Council for onsite sewerage management, dated 24 October 2025
- EPL 22021 issued to John Holland (publicly available on project website)
- ER Monthly Report November 2025 by Wolfpeak, dated 5 December 2025
- ER Monthly Report December 2025 by Wolfpeak, dated 14 January 2026
- ER Monthly Report January 2026 by Wolfpeak, dated 6 February 2026
- ER Monthly Report February 2026 by Wolfpeak, dated 7 March 2026
- ER Monthly Report March 2026 by Wolfpeak, dated 7 April 2026
- ER Site Inspection Report, dated 18 February 2026 (Wolfpeak)
- ER Site Inspection Report, dated 19 March 2026 (Wolfpeak)
- ER Site Inspection Report, dated 9 April 2026 (Wolfpeak)
- ER Site Inspection Report, dated 22 April 2026 (Wolfpeak)
- ER Endorsement Letter by Wolfpeak for TAFMP, dated 12 August 2025
- ER Review Comment Sheet for Consistency Assessment submitted via Aconex ref. JH-TRANSMIT-002061, dated 22 January 2026
- DPHI Letter ref. SSI-9406-PA-4, dated 1 October 2024 – approval of Community Complaints Mediator (Jack Ellis)

- DPHI Approval Letter, dated 11 September 2024 – approval of alternative ER
- DPHI Letter ref. SSI-9406-PA-15, dated 1 May 2025 – SIMP submission timeframe extension
- DPHI Letter ref. SSI-9406-PA-17, dated 10 June 2025 – submission of Additional Survey and Test Excavation Methodology
- DPHI Approval Letter for appointment of hydrologist Bahman Esfandiar, dated 18 July 2025
- DPHI Approval Letter for Unsurveyed Area Report (E24), dated 20 August 2025
- DPHI Approval Letter for Social Impact Management Plan Rev. 0, dated 29 August 2025
- DPHI Approval Letter for Temporary Accommodation Facility Management Plan, dated 29 August 2025
- DPHI Approval Letter for Surface Water Monitoring Program, dated 4 September 2025
- DPHI Letter ref. SSI-9406-PA-43, dated 2 September 2025 – approval of Staging Report
- DPHI Letter ref. SSI-9406-PA-47, dated 15 September 2025 – Fauna Connectivity Strategy timeframe extension
- DPHI Approval Letter for Box Gum Woodland Restoration Plan, dated 17 October 2025
- DPHI Letter ref. SSI-9406-PA-54, dated 1 December 2025 – approval of memorandum under E24 and E33(d)
- DPHI Letter ref. SSI-9406-PA-55, dated 11 December 2025 – deferral of certain E58/E65/E70 requirements
- DPHI Letter ref. SSI-9406-PA-61, dated 26 November 2025 – ER December 2025 report timeframe extension
- DPHI Letter ref. SSI-9406-PA-64, dated 11 December 2025 – Final Fauna Connectivity Strategy extension to 28 February 2026
- DPHI RFI Letter ref. SSI-9406-PA-67, dated 14 January 2026 – request for detailed investigation report (Superb Parrot)
- DPHI Letter ref. SSI-9406-PA-69, dated 20 January 2026 – BSA application timeframe extension to 31 March 2026
- DPHI Letter ref. SSI-9406-PA-70, dated 28 January 2026 – audit report submission extension to 9 February 2026
- DPHI Email, dated 29 January 2026 – extension of investigation report to 4 February 2026
- DPHI Approval Letter ref. SSI-9406-PA-59, dated 23 February 2026 – approval of Aboriginal Cultural Values Plan Rev. 0
- DPHI RFI Request, dated 30 March 2026 – low risk culverts
- DPHI Approval Letter ref. SSI-9406-PA-89, dated 15 April 2026 – endorsement of Lead and Alternate Auditors
- Post Approval Receipt SSI-9406-PA-41, dated 14 August 2025 (TAFMP submission)
- Post Approval Receipt SSI-9406-PA-54, dated 1 December 2025
- Post Approval Receipt SSI-9406-PA-61, dated 25 November 2025 (ER December 2025 report extension)
- Post Approval Receipt SSI-9406-PA-67, dated 5 December 2025 (incident notification)
- Post Approval Receipt SSI-9406-PA-72, dated 29 January 2026 (BSA submission)
- Post Approval Receipt SSI-9406-PA-76, dated 9 February 2026 (IEA No. 1 submission)
- Post Approval Receipt SSI-9406-PA-81, dated 25 March 2026 (non-compliance notification)
- Post Approval Receipt SSI-9406-PA-84, dated 7 April 2026 (Public Level Crossing Treatment Report submission)

- Post Approval Receipt SSI-9406-PA-90, dated 23 April 2026 (Private Level Crossing Treatment Report submission)
- Aconex Submission ref. IR2200-TRANSMIT-001268 to Junee Shire Council, dated 8 August 2025
- Aconex Submission ref. IR2200-TRANSMIT-001269 to TfNSW, dated 8 August 2025
- Aconex Submission ref. IR2200-TRANSMIT-001267 to Cootamundra-Gundagai Regional Council, dated 8 August 2025
- Aconex Submission ref. IR2200-RECCO-000096, dated 9 February 2026 (IEA No. 1)
- Aconex Submission ref. IR2200-TRANSMIT-002509 to Junee Council (CTTAMP Rev. 0.1), dated 13 April 2026
- Aconex Submission ref. IR2200-TRANSMIT-002507 to TfNSW (CTTAMP Rev. 0.1), dated 13 April 2026
- Hold Point Release JH-HP-000029 via Aconex ref. IR2200-RTHP-000026, dated 21 November 2025
- Hold Point Release JH-HP-000051 via Aconex ref. IR2200-RTHP-000062, dated 4 February 2026
- Hold Point Release JH-HP-000058 via Aconex ref. IR2200-RTHP-000072, dated 24 February 2026
- Non-Compliance Notification against Condition C26 and E86, dated 25 March 2026
- Non-Compliance Notification against Condition C20, dated 2 April 2026
- Non-Compliance Notification against Condition E44, dated 7 April 2026
- Non-Compliance Notification against Condition C21 and C26 (CTTAMP – Olympic Highway), dated 9 April 2026
- Incident Notification to DPHI (Superb Parrot), dated 19 December 2025
- Initial Incident Notification to DCCEEW (Superb Parrot), dated 4 December 2025
- Notifiable Incident Notification to DCCEEW, dated 17 December 2025
- Notification Letter ref. 6-0000-220-EEC-00-LT-0056, dated 5 December 2025 (Superb Parrot incident)
- BSA Submission to DPHI ref. SSI-9406-PA-72, dated 29 January 2026
- IRPL Response to DPHI's RFI Request (Superb Parrot investigation), dated 4 February 2026
- IRPL Extension Letter to DPHI (Fauna Connectivity Strategy), dated 9 December 2025
- IRPL A9 Extension Letter ref. 6-0000-210-EEC-00-LT-0075, dated 7 April 2026 (FCS revised timeframe)
- Submission Letter of IEA No. 1 and Response, dated 9 February 2026
- RFI Comment Sheet 'SSI-9406-PA-52 ETV Report RFI-104848474_260216'
- Land Access Agreement for 72 Warrens Lane, from 2 September 2024 to 2 September 2026 (signed by landowner 6 September 2024)
- Temporary Crossing Agreement for Torrens Title 202/1300288, signed for 3 years, dated 21 June 2024
- Flood Impacts Deed with Cootamundra-Gundagai Regional Council, dated 12 March 2026
- Flood Impacts Deed with Junee Shire Council, dated 6 March 2026
- Short Form Subcontract No. 7688-065 with Fontenoy AG & Earth Pty Ltd (seed collection)
- QVC Contract No. 7688-027 (Temporary Accommodation Camp management)
- Private Property Consultation Form – Old Sydney Road landowner, dated 29 July 2025
- Private Property Consultation Form – 582 Ironbong Rd landowner, dated 26 November 2025
- Private Crossing Design Criteria Forms signed by 6 Landowners (confirmation email dated 23 April 2026)
- Signed Form of N. Emery (landowner), dated 9 September 2024

- Horizon 360 Inspection INS-0015233, dated 3 April 2026 (close-out of action ACT-0006724 on 10 April 2026)
- Horizon 360 Pre and Post Rainfall Inspection Checklist INS-0126468, dated 29 March 2026
- Soteria Inspection – Section 4 (Cut and Fill, Piling Run Boundary Creek), dated 19 April 2026 (Action ACT-0193255)
- Commencement of Clearing and Grubbing Inspection (Gate 6B – Dirnaseer to Dudauman Lane), dated 27 November 2025
- Seed Collection Form, Collection No. 201, dated 11 December 2025
- Attended Noise Monitoring Record, dated 1 November 2025 (OOHW Works on 31 October 2025)
- Calibration Certificate C26214-V1, dated 20 March 2026 (noise monitor)
- Calibration Certificate C26215-V1, dated 20 March 2026 (noise monitor)
- Calibration Certificate C26216-V1, dated 20 March 2026 (noise monitor)
- Risk ID 11293 – Flood design approvals delays (last reviewed 3 March 2026)
- Risk ID 11455 – Delays in approvals of baseline monitoring and fauna connectivity strategy (last reviewed 3 March 2026)
- I2S Monthly Environmental Meeting, dated 8 August 2025
- DPHI, IRPL, JH and ER Meeting, dated 15 December 2025
- CRN Meeting Minutes, dated 14 April 2026 (IFC drawings submission)
- Hydrologist High-Level Meeting with DPHI, 10:30 AM 24 April 2026
- I2S Project Daily Bulletin, dated 5 December 2025 (December possession)
- I2S Project Daily Bulletin, dated 27 February 2026 (February possession)
- I2S Project Daily Bulletin, dated 23 April 2026 (Gate 1 / Gate 2 access)
- Toolbox Talks Evidence, dated 23 April 2026 (environmental controls and installation methodologies)
- Second Wiradjuri Language Session Calendar Invitation, dated 1 April 2026
- Email from JHG to DPI Fisheries, dated 25 February 2025 (vegetation reuse discussions – CoA E41, E44, E46)
- Email from DPI Fisheries to JHG, dated 30 September 2025 (endorsing temporary waterway crossing designs)
- Email Correspondence – Telstra, dated 1 October 2025 (mobile/internet capacity for camp facility)
- Telstra Media Release for upgrading 4G/5G coverage in Stockinbingal (disruptions 20-24 January 2026)
- Email from OzArk to JH, dated 3 December 2025 (Superb Parrot incident details and timeline)
- Email from JH, dated 15 December 2025 (DPHI categorisation as notifiable incident)
- Email from Landloch, dated 12 December 2025 (Indirect Method ETV)
- Email from Assurance & Biodiversity Stewardship Branch, dated 23 January 2026 (BSA application)
- Email from AOHC (Heritage Consultant), dated 22 January 2026 (ACVP Consultation Log update)
- Email Correspondence to CPHR, dated 11 March 2026 (felled timber re-purpose as fauna furniture)
- Email Correspondence from JH to Martinus (A2I Project), dated 23 February 2026 (CSR works coordination)
- Email Correspondence from Martinus, dated 1 March 2026 (OOHW coordination)
- Email from JH to Martinus, dated 12 April 2026 (OOHW Work Permit)
- Email from JHG to DPI Fisheries, dated 26 March 2026 (vegetation reuse confirmation)
- Email from DPI Fisheries, dated 2 April 2026 (guidance on snags and habitat considerations)
- Email Correspondence to JH from IRPL, dated 22 April 2026 (overdue actions notification)

- Email from IRPL to DPHI, dated 8 April 2026 (ETV Report Figure A06 comments)
- Email from IRPL to DPHI, dated 24 April 2026 (responses to DPHI's ETVR RFI feedback)
- Email from Stakeholder Engagement Officer (IRPL), dated 23 April 2026 (signed Private Crossing Design Criteria Forms)
- Email Trail – Complaints Register Weekly Submission to ER, from 17 April 2025 to 13 April 2026
- Email – Pre-clearance Survey Confirmation by Ecologist, dated 24 April 2026 (rocky outcrop area at Cut 20)
- Email – Unexpected Find Advice by JHG, dated 15 April 2026 (contamination)
- Cleanaway Waste Report Register (last entry 1 December 2025 – Burley Griffin Site, invoice #15221246)
- Cleanaway EPL Licence No. 12945
- Detailed Site Investigations (DSI) – AEC 1 and 2 Stockinbingal Railyard
- Detailed Site Investigation (DSI) – AEC 11 Rev. 4 prepared by McMahon

6. Audit Findings

6.1 Assessment of Compliance

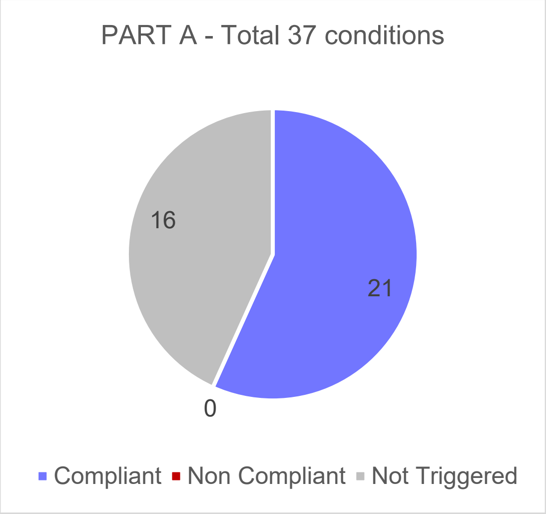
This audit was completed to assess the implementation of the Construction Environmental Management Plan and Sub-Plans, as well as environmental controls established by Inland Rail and John Holland Group for the Inland Rail – Illabo to Stockinbingal project, against the SSI-9406 Approval Conditions, Schedule 2 (274 conditions).

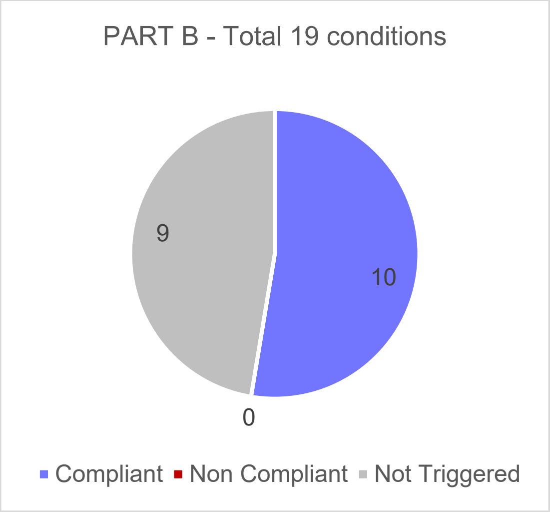
The following table summarises the audit findings by rating category:

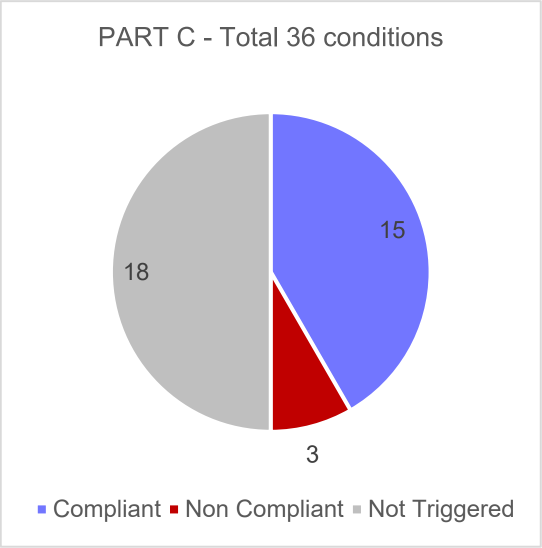
Findings Rating	Findings
Compliant	115
Non-Compliant	7
Not Triggered	152
Total	**274**

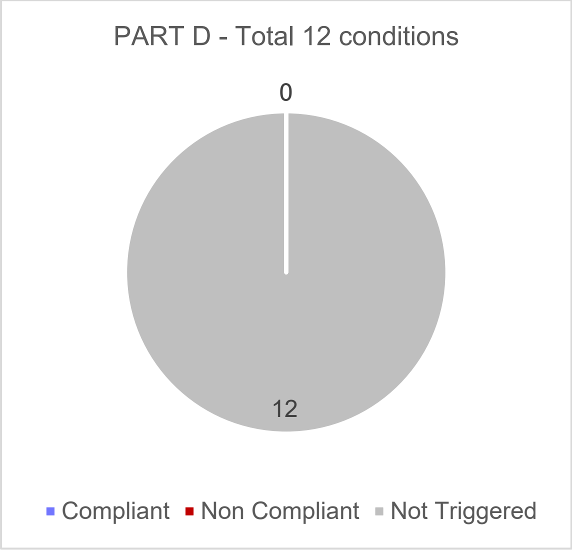
Table 11- Summary of Findings

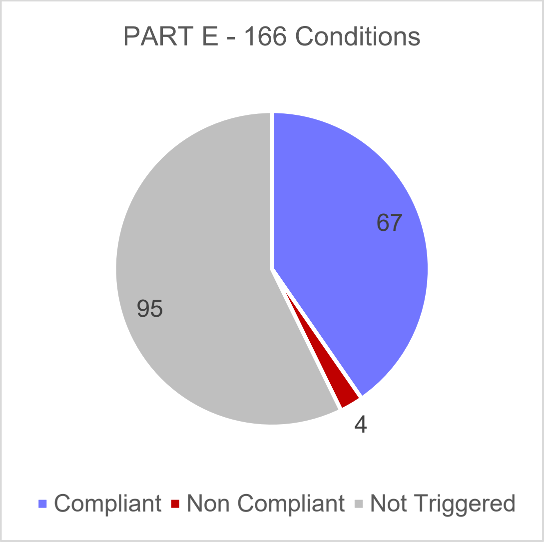
The comparison of audit requirements against the compliance ratings is as follows:

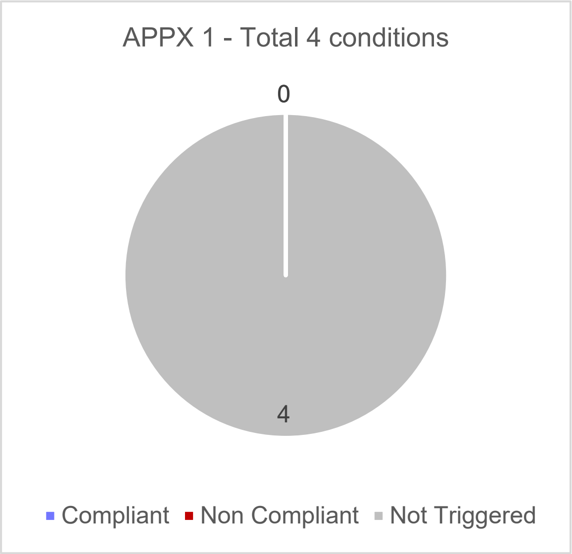


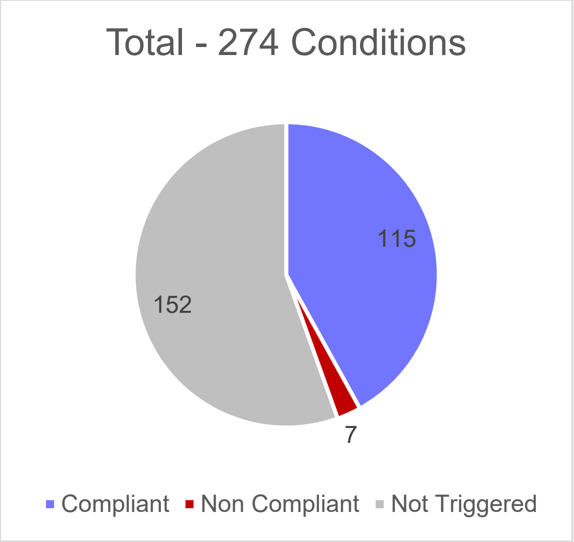



PART C - Total 36 conditions
15
3
18
Compliant
Non Compliant
Not Triggered


PART D - Total 12 conditions
0
12
Compliant
Non Compliant
Not Triggered


PART E - 166 Conditions
67
4
95
Compliant
Non Compliant
Not Triggered


APPX 1 - Total 4 conditions
0
4
Compliant
Non Compliant
Not Triggered


Total - 274 Conditions
115
7
152
Compliant
Non Compliant
Not Triggered

6.2 Notices, Complaints, Incidents & Non-Compliances

IRPL and JHG confirmed during the audit interview that no regulatory notices were issued during the audit period.

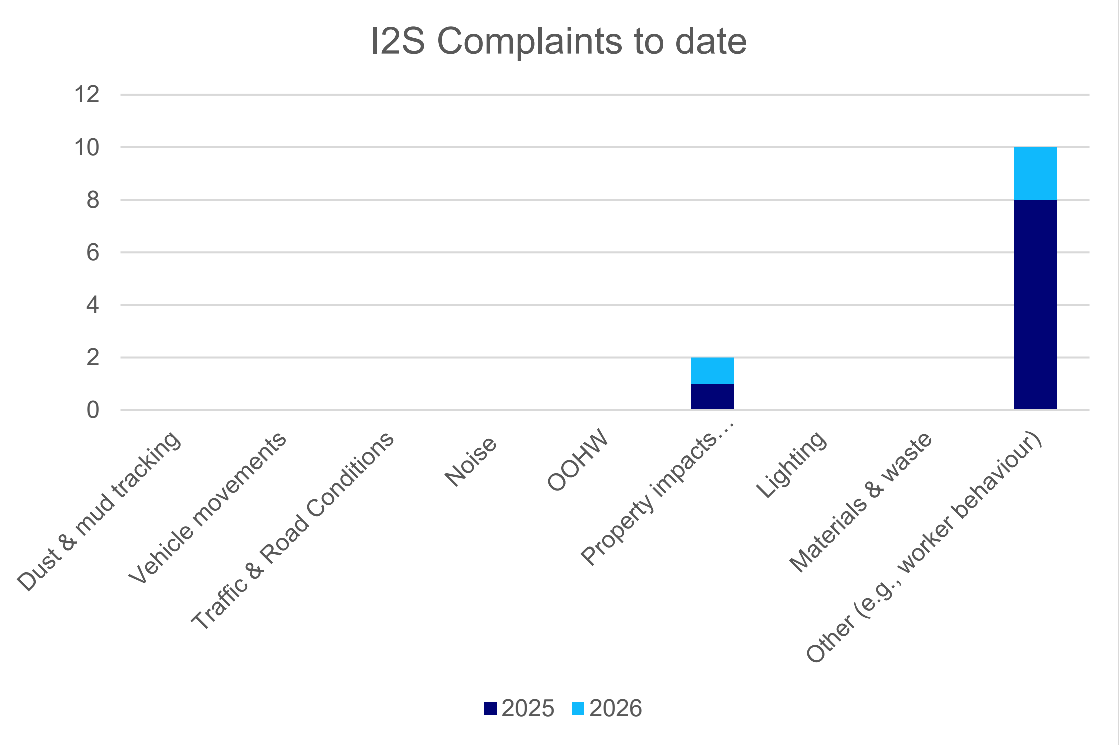
6.2.1 Complaints

A review of the Community Communication Strategy (CCS) was undertaken during the audit in accordance with Condition B1-B2. The CCS appeared well implemented. Refer to Section 6.8 for details.

Three complaints were received during the audit period which related to worker behaviour and Construction Impact Zone (CIZ) gates left open. Close out was reviewed and appeared to be adequately addressed. No other complaints have been received during the audit period.

The Community team have established a tracking system which was extracted from Consultation Manager into excel and is used to prepare the monthly report. Details of consultation are separated by type (general notifications, targeted notifications, media releases, events), as well as any enquiries and complaints (as applicable) and their categories. Additionally, Social Impact Management Plan (SIMP) Quarterly Reports are being issued to provide details on community engagement activities and complaints.

Based on the review of the Part B Conditions, a total of twelve (12) complaints have been received on the project to date.



6.2.2 Incidents

One reportable environmental incident occurred during the audit period.

On 2 December 2025, three juvenile Superb Parrots were identified in a felled tree during clearing and grubbing activities nearby to Dirnaseer Road (chainage 436.82). The tree had been recorded as a habitat tree in the OzArk pre-clearance survey dated 26 September 2025 and marked on site with pink paint. The fledglings were contained by the project ecologist, assessed as uninjured, and released by a licensed wildlife carer on 11 December 2025.

The incident was initially managed under the Unexpected and Incidental Finds Procedure, with verbal and written notifications issued to DPHI and DCCEEW in accordance with the reporting requirements. It was subsequently notified to DPHI in accordance with reportable-incident requirements. The Detailed Investigation Report was submitted to DPHI on 4 February 2026, identifying the primary cause as a schedule delay that resulted in pre-clearance and clearing works occurring outside the Superb Parrot breeding window. Corrective actions have since been incorporated into the project's clearing procedures.

No other reportable or environmental-harm incidents were recorded during the audit period.

6.2.3 Non-Compliances

Seven (7) non-compliances, including those self-reported, were identified within the scope of the audit and are detailed under Section 6.8.

The non-compliance identified during the previous audit was reviewed as per Section 6.3 below.

6.3 Previous Audit Findings

Findings from the previous audit (26 & 27 November 2025) were reviewed as follows:

Finding No.	Condition of Approval	Audit Finding Details	Close Out
Non-compliance **I2S-01_NC-01**	**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. **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. Appendix A1 to A4.	Upon review of the project Incident Register_20251125, 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. 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.	Incidents are recorded in the Soteria or H360 system and subsequently reviewed against the applicable Conditions of Approval (CoAs). Where the assessment determines that if an incident constitutes material harm, it is then escalated and managed in accordance with the relevant procedures and requirements. Sighted ER email 20 April 2026 to JHG – regarding fencing incident, confirmed that it was not notifiable incident. No impact to ecology; did not constitute as material harm. This non-compliance is now considered addressed. **CLOSED**

Finding No.	Condition of Approval	Audit Finding Details	Close Out
Non-compliance **I2S-01_NC-02**	**E80.** 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. 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.	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. Furthermore, no evidence has been provided to determine whether a copy of the Register has been provided to the Planning Secretary.	Sighted Dam Register document no. 5-0019-220-IHY-00-RG-0001_A – last updated on 5 November 2025. The register includes property name, lot no., dam location, dam surface area, dam inflow upstream, dam outflow downstream, water diverting structures, existing catchment area, developed catchment area, dam water source, and impacts to owner and Project. The Dam Register is also provided as part of the Flood Design Verification Report (FDVR) under Appendix B7. IRPL confirmed during the audit interview that there have been no changes to the dam register. Sighted private property consultation form dated 29 July 2025, confirming consultation with the Old Sydney Road landowner. The consultation addressed flood model design changes, the farm dam register, native vegetation, condition surveys, as well as construction and operational noise and vibration. Also sighted private property consultation form dated 26 November 2025, confirming consultation with an Ironbong Rd owner. This non-compliance is now considered addressed. **CLOSED**

Finding No.	Condition of Approval	Audit Finding Details	Close Out
Non-compliance **I2S-01_NC-03**	**E101. Road Safety** 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. 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.	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.	The following evidence was presented during the audit: • Illabo to Stockinbingal Road Condition Report Rev. B, dated 29 July 2025. • Aconex submission (ref. IR2200-TRANSMIT-001268) to Junee Shire Council, dated 8 August 2025. • Aconex submission (ref. IR2200-TRANSMIT-001269) to TfNSW, dated 8 August 2025. • Aconex submission (ref. IR2200-TRANSMIT-001267) to Cootamundra-Gundagai Regional Council, dated 8 August 2025. Road Dilapidation Reports were verified to be attached to each correspondence. This non-compliance is now considered addressed. **CLOSED**

Finding No.	Condition of Approval	Audit Finding Details	Close Out
Non-compliance **I2S-01_NC-04**	**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 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. **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.	A self-reported non-compliance was identified due to installation of three survey markers within indigenous survey zones 1, 9 and 11. The non-compliance in relation to disturbance of Indigenous Zone 9 on 16 April 2025 was notified to DPHI on 29 April 2025.	DPHI requested 4 June 2025 that IRPL are required 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. Sighted DPHI letter dated 2 September 2025 noting non-compliance with Schedule 2, Conditions E135 and E140 due to the installation of a survey mark in Zone 9 on 16 April 2025. The letter also confirmed that disturbance within Indigenous Zone 9 did not impact any Aboriginal sites or places or cause harm to Aboriginal cultural values; accordingly, no further enforcement action was proposed by DPHI. This non-compliance is now considered addressed. **CLOSED**

Finding No.	Condition of Approval	Audit Finding Details	Close Out
Non-compliance **I2S-01_NC-05**	**E145. Condition Surveys and Rectification** 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. 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.	Following conditions reports were provided: - Illabo to Stockinbingal Road Condition Report Rev. B, dated 29 July 2025. - Pre-Construction Condition Survey for Billabong 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. - Pre-Construction Condition Survey for Access via 3A Cambria Street, dated 24 June 2025. Evidence has not been provided to determine whether copies of these Condition Survey Reports have been provided to the owners of the items surveyed.	The I2S Conditions Report Distribution Register was sighted, containing details of landowners, issued lease reports with receipt confirmations, and Aconex references for all condition assessments prepared and transmitted via ARTC, including corresponding message IDs. The following Aconex evidence was also reviewed: - Leased Land Report (Condition Assessment) (Document No. 5-0019-220-IAC-00-RP-0003, Rev 0), transmitted under Aconex reference JH-TRANSMIT-000604, dated 23 October 2025, confirming the status as closed-out. However, it was noted that the status of some condition survey records was not up to date. An improvement opportunity (I2S-02_OFI-06) was identified to update the register used for tracking the status of condition surveys. This non-compliance is now considered addressed. **CLOSED**

Finding No.	Condition of Approval	Audit Finding Details	Close Out
Non-compliance **I2S-01_NC-06**	**E161(c). Unexpected Finds** An Unexpected Finds Procedure for Contamination must: 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;	Evidence has not been provided to determine whether the Unexpected Finds Procedure for Contamination has been reviewed and endorsed by Site Auditor.	Sighted Unexpected Finds Procedure Rev. 0, document no. 5-0019-220-PES-00-PR-0001, dated 16 December 2024. Interim Audit Advice by the Envirocene (Site Auditor) is provided in Appendix D of the procedure, confirming that the review of the Unexpected Finds Procedure had been undertaken and is appropriate to I2S. This non-compliance is now considered addressed. **CLOSED**
Opportunity for Improvement **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.	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. 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.	Sighted Complaints Register “5-0019-220-PCS-00-RG-0001_65 Complaints Register” confirming that the complaint # 8474 has been closed with all the required information including closure status, date received and method of complaint. This opportunity for improvement is now considered addressed. **CLOSED**

Finding No.	Condition of Approval	Audit Finding Details	Close Out
Opportunity for Improvement **I2S-01_OFI-02**	**E83.** The construction of the CSSI must protect the integrity of riparian corridors in accordance with the Guidelines for controlled activities on waterfront land: Riparian Corridors (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. 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.	Sighted I2S Project Daily Bulletin, dated 5 December 2025, issued during the December possession, which states that "*The closest waterway is Billabong Creek, approximately 1.7 km from the work area.*" Sighted the I2S Project Daily Bulletin dated 27 February 2026, issued during the February possession. The environmental section outlines measures to be implemented during the works, noting that activities were being undertaken adjacent to and within the vicinity of Billabong Creek. This opportunity for improvement is now considered addressed. **CLOSED**

Table 12- Status of Previous Audit Findings

6.4 Audit Site Inspection

A site inspection undertaken on 23 April 2026 from 7:30am to 1:00pm with representatives of IRPL and JHG, where the BVBI lead auditor reviewed the effectiveness of environmental mitigation measures as follows:

Powder Horn Creek

- Temporary piped crossing for fish passages installed across the creek
- Rock filter dam installed downstream
- Clean water diversion channel installed and lined with geofabric
- Ground cover and vegetation noted throughout the creek, with exposed areas stabilised with polymer binder
- Flagging installed around the creek with habitat trees marked with blue paint outside the construction area
- Erosion and sediment control measures observed to be generally well maintained (however, refer to OBS-02 in relation to wind-related disturbance of geofabric pins)

Dirnaseer Compound & Gate 7B

- Piling works completed at Dirnaseer Road with piling pad in place
- Turkey's nest installed for water storage and sediment control
- Mulch bunds installed along the verge of Dirnaseer Road
- Vehicle washdown area established at the Dirnaseer Compound
- Rock checks installed along the swale drain at the Dirnaseer Compound
- Water cart actively operating along the access alignment for dust suppression as observed
- Spill kit available on site
- Concrete washout tray in place
- Polymer available on site for stabilisation
- Refer to OBS-04 in relation to availability of Safety Data Sheets at the chemical storage area
- Refer to OBS-05 in relation to spill identified from a generator located near the washdown area.
- Sediment controls observed at the low point area at Gate 7B
- One section of sediment fence had been removed at the corner of the low sump area – Gate 7B (refer to OBS-03 — reinstatement recommended to ensure adequate coverage)

Run Boundary Creek

- Piling works in progress within the construction boundary
- Green flagging installed for clearing limits, with habitat trees marked with blue paint outside the work area
- Orange flagging installed to demarcate construction limits
- Timber retained on site to be reused within the Biodiversity Stewardship Agreement (BSA) site
- Sediment fence installed around the perimeter of the stockpile
- Concrete washout area for piling works located adjacent to the BSA boundary and mulch stockpile (refer to OBS-06 – additional controls recommended where washout areas are situated near sensitive areas)

Biodiversity Stewardship Agreement (BSA) Boundary Area

- Timber hollows observed and are temporarily stored outside the fence line; scheduled to be relocated to designated locations within the BSA boundary
- Mulch stockpile present adjacent to the BSA boundary with no impact observed

Access Tracks and Alignment (General) – Site Wide Environmental Controls

- Sediment fences installed at low points along the alignment
- Rumble grid in place at Gate 7A to control mud tracking onto public roads
- Mulch placed along the verge for erosion and sediment control
- Exposed areas seeded with grass, with growth evident across treated surfaces
- Stockpile and bank surfaces stabilised with soil binder
- Stockpiled material being crushed and reused for cut-and-fill works (mobile crusher in operation)
- Existing farm dams along the alignment being utilised for water storage in accordance with the Water Reuse Strategy
- Water fill points installed along the alignment with silt fencing in place as sediment control
- Concrete pad works in progress with a dedicated concrete waste bin available
- Earthworks in progress along the access alignment – no dust observed during the inspection
- Logs retained on site for future reuse
- Moxies operational on site – no dust observed.
- All access roads stabilised to reduce dust emissions; water carts were observed as operational across the alignment

Six (6) observations were raised during the site inspection as follows:

Ref	Observation
OBS-01	A concrete pour was in progress at the time of inspection; however, a spill kit was not initially available at the work area. Immediate corrective action was taken, and a spill kit was relocated nearby. Spill kits should be maintained at each active work area and relocated as activities progress to ensure immediate availability at all times.
OBS-02	Erosion and sediment control measures were implemented at Powder Horn Creek, with exposed areas covered using geofabric. Due to high winds, pins were removed from one section, resulting in temporary exposure of the area; this was immediately rectified. Ongoing inspection and maintenance of erosion and sediment control measures are recommended especially during the weather events.
OBS-03	One section of the sediment fence had been removed at the corner of the Gate 7B low sump area. Reinstatement is recommended to ensure adequate area coverage.
OBS-04	SDS were not available at the chemical storage area in the Dirnaseer Compound. It is recommended that SDS be provided and kept accessible at the storage area.

Ref	Observation
OBS-05	A spill was identified from a generator located near the washdown area during the inspection. It was recommended that the internal spill incident management process be followed and that the area be cleaned immediately. Close-out evidence was presented at the closing meeting, confirming that incident INC-0112040 was raised in Soteria on 24 April 2026. Corrective actions included relocating an unused spill tray beneath the generator refuelling nozzle and completing the clean-up of the affected area, with photographic evidence sighted.
OBS-06	The concrete washout area for piling works was located adjacent to the BSA boundary and mulch stockpile. It is recommended that additional controls be implemented when washout areas are situated near sensitive areas to minimise environmental risk.

Table 13- Detail of Site Observations

Photos of the site inspection, including close out, are included under Appendix G.

6.5 Suitability of Plans and the Environmental Management System

The Construction Environmental Management Plan (CEMP) and associated sub-plans were reviewed and endorsed by the Environmental Representative (ER) in accordance with Condition C3, prior to the commencement of construction. Required consultation was undertaken and documented within the CEMP, as evidenced during the initial audit.

Several Sub-Plans were also developed in accordance with the condition requirements and to address environmental impacts during construction for the management of Heritage, Noise and Vibration, Transport, Traffic and Access Management, Biodiversity Management, Soil and Water Management, Flood Emergency Management, and Biosecurity Management.

For changes considered minor, the ER reviews and endorses the updates to the CEMP and Sub-Plans with major changes requiring submission to DPHI for review and approval. The CEMP is currently Revision 2 as dated 10 September 2025 with no changes actioned during the audit period. The project is currently undertaking the six-monthly review of the CEMP and sub-plans, which will be submitted to the ER for endorsement.

The ER also undertakes regular reviews and endorsement of environmental documentation, as evidenced through ER Monthly Reports and fortnightly inspections, to ensure the environmental management system remains current and fit for purpose.

During the audit period, two non-compliances were identified in relation to the CTTAMP, associated with the use of Gate 1 (Warrens Lane) and Gate 2 via the Olympic Highway. The CTTAMP has since been updated and is currently under review by Junee Council and TfNSW. Following this, it will be reviewed and endorsed by the ER prior to submission to DPHI for approval.

A non-compliance was identified in relation to vegetation flagging requirements under the Biodiversity Management Plan (BMP). The BMP is currently under review by IRPL and will subsequently be reviewed and endorsed by the ER prior to submission to DPHI for approval.

Based on the evidence provided, continued implementation of the CEMP and sub-plans was reviewed through general compliance with approval conditions, observed site conditions, and the management of complaints during the audit period. Detailed findings regarding the implementation of the CEMP and sub-plans are provided in Section 6.8 (Audit Findings).

6.6 Actual vs Predicated Impacts

In accordance with the IAPAR 2020 guidelines, the Lead Auditor has assessed the actual environmental impacts against the predicted impacts as per the EIS. Given the scale of technical studies that supported the preparation of the EIS, it is not possible to determine full compliance to such predictions during this audit, rather the Lead Auditor has adopted a qualitative approach to the comparison.

Based upon the review of compliance with the conditions of approval, and the environmental performance outcomes verified during the audit, it was concluded that the Inland Rail – Illabo to Stockinbingal project was generally consistent with the Environmental Impact Statement (EIS), Submission reports, and Amendment reports. Compliance demonstrated for the key areas are as follows:

6.6.1 Biodiversity

The Biodiversity Management Plan (BMP, Rev. 0, dated 1 September 2025) appeared to be generally implemented, with pre-clearance surveys completed by the project Ecologist (OzArk) and clearing permits issued. Vegetation flagging, habitat tree marking, and construction limit demarcation were observed throughout the alignment during the site inspection. Following a self-reported non-compliance (recorded as part of this audit as I2S-02_NC-01), flagging was reinstated and reinforced through toolbox talks on 23 April 2026.

The Box Gum Woodland Restoration Plan (Rev. 2, dated 13 October 2025) has been approved by DPHI and the Biodiversity Stewardship Agreement (BSA) application has been submitted (ref. SSI-9406-PA-72, dated 29 January 2026). Cleared timber, hollows and root balls are being retained for reuse within the BSA boundary and as fauna furniture, in consultation with DPI Fisheries.

The Fauna Connectivity Strategy remains in draft (Rev. G, 25 February 2026). An amended A9 extension letter (dated 7 April 2026) has been issued proposing a revised submission date of 2 September 2026.

One reportable environmental incident occurred during the audit period — three juvenile Superb Parrots identified in a felled habitat tree off Dirnaseer Road on 2 December 2025, rescued and released uninjured on 11 December 2025 (refer to Section 6.2.2).

6.6.2 Traffic Transport and access

The Construction Traffic, Transport and Access Management Plan (CTTAMP, Rev. 1 dated 7 November 2025) is in place. The Illabo to Stockinbingal Road Condition Report (Rev. B, 29 July 2025) has been prepared and transmitted to TfNSW, Junee Shire Council and Cootamundra-Gundagai Regional Council via Aconex. A Pre-Construction Road Safety Audit was completed for Junee Shire Council roads by Civlink Consulting on 23 May 2025.

Two self-reported non-compliances were raised in relation to the CTTAMP during the audit period:

- refer to I2S-02_NC-02 (Olympic Highway Access)
- refer to I2S-02_NC-03 (Gate 1 Warrens Lane)

The CTTAMP has since been updated and is under review by Junee Shire Council and TfNSW prior to ER endorsement and DPHI approval. Use of Gate 1 has been ceased until the approval of updated CTTAMP and is captured in the project daily bulletin dated 23 April 2026.

6.6.3 Heritage

Heritage impacts identified in the EIS are addressed through Heritage Management Plan (HMP, Rev. 0 dated 6 August 2025), the Aboriginal Cultural Values Plan (ACVP, approved by DPHI on 23 February 2026), and the Unexpected and Incidental Finds Protocol.

Test and salvage excavations have been completed across Zones 1 and 2 by Apex Archaeology, with 1,220 and 85 lithic items recovered respectively. Consultation with the Registered Aboriginal Parties (RAPs) is ongoing and Wiradjuri language sessions have been delivered to build workforce awareness. No unexpected Aboriginal heritage finds have occurred and no impacts to non-Aboriginal heritage items were reported during the audit period.

6.6.4 Noise and Vibration

Construction noise and vibration impacts identified in the EIS are addressed through the Noise and Vibration Management Plan (NVMP, Rev. 0 dated 1 August 2025) and the Out-of-Hours Work Protocol (Rev. E dated 17 June 2025). Attended noise monitoring was undertaken on 1 November 2025 during the possession works, with no exceedances recorded. No vibratory works triggered cosmetic damage criteria during the audit period. No complaints have been received to date.

6.6.5 Soil and Contamination

The Sampling and Analysis Quality Plan (SAQP, Rev. V3) is in place and Detailed Site Investigations (DSI) are being progressed for AEC 1, AEC 2 (Stockinbingal Railyard) and AEC 11 with Envirocene engaged as the accredited Site Auditor, who provided Interim Audit Advice No. 3 upon review of the DSI, issued 11 March 2026. Erosion and sediment controls were observed during the site inspection, including geofabric, polymer binder, rock checks, sediment fences, mulch bunds and rumble grids. Progressive Erosion and Sediment Control Plans for Powder Horn Creek and Ironbong Road have been prepared by a CPESC. An unexpected contamination find was advised by JHG on 15 April 2026 and is being managed under the Unexpected and Incidental Finds Procedure – Contamination.

6.6.6 Other Impacts

- Social and economic: Addressed through the Social Impact Management Plan (SIMP, Rev. 1 dated 30 October 2025), the Workforce Code of Conduct and the Temporary Accommodation Facility Management Plan (TAFMP). The accommodation Camp is operating under QVC Management (Contract no. 7688-027). SIMP Quarterly Reports for Q4 2025 and Q1 2026 have been prepared. A non-compliance (refer to I2S-02_NC-06) was raised regarding the website upload of the Q4 2025 report; this was promptly rectified and closed, as confirmed during the closing meeting. No complaints required mediation during the audit period.
- Land Use Property: Land Access Agreements and Temporary Crossing Agreements are in place and Individual Property Management Plans (IPMPs) are being progressed pending completion of the third round of design consultation. Pre-Construction Condition Surveys have been completed for Billabong Creek, Goldenfields Water Reservoir, the NBN Tower, 2 West Street and access via 3A Cambria Street; the I2S Conditions Report Distribution Register confirms transmittal to affected landowners.

- Landscape and visual: Addressed through the Visual and Landscape Impact Mitigation Plan (Rev. B dated 20 March 2026), currently in draft following IRPL comments. A total of 21 landowners were consulted during preparation.
- Waste: Addressed through the Waste Management Plan (Rev. 0 dated 14 August 2025). Cleanaway is engaged for waste and recycling services. No material has been taken offsite during the audit period – cleared vegetation is being retained for reuse on site and within the BSA. Opportunity for Improvement I2S-02_OFI-08 was raised regarding the capture of data for the reuse of logs and mulch.
- Air Quality: Dust mitigation measures observed during the site inspection included multiple water carts operational across the alignment, stabilised access tracks, polymer binder application, and progressive seeding of exposed areas. No dust was observed during the inspection.
- Cumulative Impacts: Fortnightly coordination meetings are held with the adjacent Inland Rail Albury to Illabo (A2I) project to align possession works and out-of-hours activities. Coordination with A2I and other Inland Rail projects has been documented via email correspondence sighted during the audit.

6.7 Key Strengths

The outcome of the audit verified that IRPL and JHG demonstrated good controls to address environmental impacts. The following key strengths were noted:

- Strong implementation of erosion and sediment control measures, particularly around creek areas
- Multiple water carts operating along the alignment to manage dust observed during the site inspection
- Personnel assigned for polymer binder application to stabilise exposed surfaces
- Clear and consistent communication of environmental controls to staff through daily bulletins

6.8 Audit Findings and Recommendations

Implementation of Construction Environmental Management Plan and Sub-Plans were generally verified as compliant with SSI-9406 Approval Conditions. Refer to Appendix E for full details of the completed audit checklist.

Seven (7) non-compliances were identified during the audit period. Eight (8) opportunities for improvement were raised within the scope of this audit as follows:

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
NON-COMPLIANCES			
I2S-02_NC-01 (Self-Reported)	**C20:** The Biodiversity Management Sub-plan must be endorsed by a suitably qualified and experienced ecologist.	The non-compliance was self-reported by IRPL to DPHI via a non-compliance notification dated 2 April 2026, relating to flagging installation in accordance with the Biodiversity Management Plan (BMP) and the identification of reuse opportunities for woody debris.	Corrective actions implemented by IRPL and JHG include: • Review and reinstatement of vegetation flagging and exclusion fencing across the project area

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
		During DPHI's site inspection on 19 March 2026, flagging was not installed at all locations, and where flagging was installed, it was not consistent with the requirements as per Section 8.3 of the Biodiversity Management Plan (BMP). Additionally, during DPHI's site inspection on 18 February 2026, opportunities for reuse of woody debris had not been clearly communicated to the contractor prior to mulching activities as per Section 8.7 of the BMP.	in accordance with BMP Section 8.3, observed during the audit site inspection on 23 April 2026. - Update of the Biodiversity Management Plan currently under review by IRPL, to be subsequently endorsed by the ER prior to submission to DPHI for approval. - Confirmation of suitable locations for the reuse of timber and hollows within the Biodiversity Stewardship Agreement (BSA) boundary, supported by ongoing consultation with DPI Fisheries (correspondence dated 26 March 2026 and 2 April 2026) and CPHR (correspondence dated 11 March 2026). - Workforce communication reinforced through toolbox talks dated 23 April 2026 covering environmental controls and timber/hollow installation methodologies. This non-compliance remains **OPEN** pending finalisation and DPHI approval of the updated

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
			BMP. Close-out will be verified at the next Independent Environmental Audit.
I2S-02_NC-02 (Self-Reported)	**C21:** The Construction Traffic, Transport and Access Management Sub-plan (CTTAMP) must be consistent with any agreements with the relevant roads authority about the use and management of local roads.	The non-compliance was self-reported by IRPL to DPHI via a non-compliance notification dated 9 April 2026, relating to the use of access point not included in the Construction Traffic, Transport and Access Management Plan (CTTAMP). During project activities from January 2026, an ARTC access/egress point on the Olympic Highway (south of Billabong Creek) was utilised under a Road Occupation Licence (ROL) to support construction works. However, this access point was not included in the approved CTTAMP, as required under MCoA C21 and C26. The omission was identified following discussions with DPHI during the 25 March 2026 follow-up meeting and the 31 March 2026 Post Approvals meeting, and was subsequently confirmed in consultation with the Environmental Representative (ER) on 2 April 2026.	Corrective actions implemented by IRPL and JHG include: • Cessation of the use of the Olympic Highway access/egress point pending CTTAMP update and approval. • Update of the CTTAMP to Rev. 0.1 to incorporate the Olympic Highway access/egress point, submitted to Junee Shire Council (Aconex ref. IR2200-TRANSMIT-002509) and TfNSW (Aconex ref. IR2200-TRANSMIT-002507) on 13 April 2026 for review. This non-compliance remains **OPEN** pending Council/TfNSW review, ER endorsement and DPHI approval of CTTAMP Rev. 0.1. Close-out will be verified at the next Independent Environmental Audit.
I2S-02_NC-03 (Self-Reported)	**C26:** Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (as applicable and as identified in	The non-compliance was self-reported by IRPL to DPHI via non-compliance notification dated 25 March 2026, relating to the gate 1 access not included in the Construction	Corrective actions implemented by IRPL and JHG include: • Cessation of the use of Gate 1 (Warrens Lane),

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	the CEMF approved under Condition C1). The CEMP and CEMP Sub-plans, as approved by the Planning 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 Planning Secretary or ER.	Traffic, Transport and Access Management Plan (CTTAMP). During the DPHI and CPHR site inspection on 19 March 2026, the use of Gate 1 (Warrens Lane) and the associated access track was identified as an unapproved access point in the approved CTTAMP. JHG confirmed use of the gate had commenced during the set-up for the February 2026 possession and was included in a Consistency Assessment (CA) on the Inland Rail website; however, the CTTAMP was not updated prior to the use of the gate and access track.	as confirmed in the project daily bulletin dated 23 April 2026 and verified during the audit site inspection on 23 April 2026. - Update of the CTTAMP to Rev. 0.1 to incorporate Gate 1 (Warrens Lane), submitted to Junee Shire Council (Aconex ref. IR2200-TRANSMIT-002509) and TfNSW (Aconex ref. IR2200-TRANSMIT-002507) on 13 April 2026 for review. This non-compliance remains **OPEN** pending Council/TfNSW review, ER endorsement and DPHI approval of CTTAMP Rev. 0.1. Close-out will be verified at the next Independent Environmental Audit.
I2S-02_NC-04	**E35:** A Box Gum Woodland Restoration Plan must be prepared by an ecologist with appropriate qualifications and experience in Box Gum Woodland restoration determined in consultation with BCS for the management of the restoration site identified in Condition A1(e) and A1(f) to ensure:	The Box Gum Woodland Restoration Plan was not uploaded to the project website as required by Condition E35, therefore triggering a non-compliance.	It is recommended that upload occur without delay to be fully compliant with Condition E35. This was rectified promptly, with the Box Gum Woodland Restoration Plan subsequently uploaded to the website as evidenced during closing meeting. This

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	d) in perpetuity management of existing Box Gum Woodland e) increase in the extent of Box Gum Woodland and f) improve connectivity within and across the site identified in Condition E34. The Box Gum Woodland Restoration Plan must be submitted to and approved by the Planning Secretary prior to the commencement of construction. The Box Gum Woodland Restoration Plan must be implemented and made publicly accessible		non-compliance is now considered **CLOSED**.
I2S-02_NC-05 (Self-Reported)	**E44: Connectivity Strategy** The draft Connectivity Strategy listed in Condition A1 must be finalised by a suitably qualified and experienced ecologist(s) with experience in fauna connectivity, fauna crossings and experimental design. The final Connectivity Strategy must be prepared in consultation with BCS and DPI Fisheries and submitted to the Planning Secretary for approval prior to construction commencing.	The non-compliance was self-reported by IRPL to DPHI via non-compliance notification dated 7 April 2026, relating to the timely submission of Fauna Connectivity Strategy. The submission timeframe for the final Fauna Connectivity Strategy (FCS) was extended by DPHI to 9 December 2025 (ref. SSI-9406-PA-47) and subsequently to 28 February 2026 (ref. SSI-9406-PA-64). A third extension request submitted on 26 February 2026 was refused by DPHI on 2 April 2026. The final FCS was not submitted by the 28 February 2026 deadline as required by MCoA E44, and the further extension request was not accepted by DPHI.	Corrective actions implemented by IRPL and JHG include: • Issuance of an amended Condition A9 Extension letter (IRPL ref. 6-0000-210-EEC-00-LT-0075) to DPHI on 7 April 2026, with justification, progress to date, and future milestones for the FCS. • A revised submission timeframe of 2 September 2026 has been proposed in the amended A9 letter, supported by a program of progressive submissions of FCS components addressing the matters raised by

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
			DPHI and CPHR during the 19 March 2026 site visit and 25 March 2026 follow-up meeting. This non-compliance remains **OPEN** pending DPHI acceptance of the amended A9 letter and subsequent submission and approval of the final Fauna Connectivity Strategy. Close-out will be verified at the next Independent Environmental Audit.
I2S-02_NC-06	**E110:** The SIMP must include specific details of the commitments, programs and timing to secure and enhance positive social outcomes, and measures to minimise negative social and cumulative impacts associated with the CSSI. Reporting on the social impact performance of the CSSI, including monitoring results, must be reported quarterly with the results made publicly accessible in accordance with Condition B18.	The SIMP Quarterly Report Q4 2025 was not uploaded to the project website as required by Condition E110, therefore triggering a non-compliance.	It is recommended that upload occur without delay to be fully compliant with Condition E110. This has been rectified, with the SIMP Quarterly Reports for Q4 2025 and Q1 2026 uploaded to the website as evidenced during closing meeting. This non-compliance is now considered **CLOSED**.
I2S-02_NC-07	**E119:** The Employee Code of Conduct must be reviewed 12 months after approval and annually thereafter for the duration of construction. Updates to the Code of Conduct must be approved by the ER. The updated Code of Conduct must	The Workforce Code of Conduct Rev. 0, dated 16 December 2024 was not reviewed within the annual timeframe as required by Condition E119.	It is recommended that JHG implement a process to ensure timeframes are continually met. Following the audit, JHG provided evidence that a review has now been undertaken. Sighted Workforce Code of Conduct

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	be made publicly available within one month of approval.		Rev. 0.1, dated 27 April 2026, issued to IRPL for review via Aconex ref. JH-TRANSMIT-002759, dated 4 May 2026, with the ER still to approve the Code of Conduct. This non-compliance is now considered **CLOSED**.
OPPORTUNITIES FOR IMPROVEMENT			
I2S-02-OFI-01	**B18:** A website or webpage providing information in relation to the CSSI must be established before commencement of work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction.	The project website did not contain up to date documentation e.g., Temporary Accommodation Facility Management Plan – unsigned copy uploaded; unsigned copy of the Minor Ancillary Facility for Ironbong Road CH9380. In addition, the SIMP Quarterly Report (Q4 2025) was not uploaded within the required timeframe. This matter has been addressed as a non-compliance under Condition E110 (refer to I2S-02_NC-06).	It is recommended that the project website is to be updated and continually maintained with current information and documentation.
I2S-02-OFI-02	**C26:** Construction must not commence until the CEMP and all CEMP Sub-plans have been approved by the Planning Secretary or endorsed by the ER (as applicable and as identified in the CEMF approved under Condition C1). The CEMP and CEMP Sub-plans, as approved by the Planning Secretary, including any minor amendments approved by the ER, must be implemented for the duration of construction. Where the CSSI is	Actions raised in Soteria did not always have a photo showing what was required for close out. It is recommended that a photo of the required action be included for traceability purposes. Additionally, for both IRPL and JHG, actions were assigned against personnel that were on leave or offsite.	It is recommended to assign actions in Soteria appropriately. It is also recommended to investigate options to potentially assign to a group as opposed to individuals, or to re-assign actions to other available personnel to ensure timely close out.

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	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 Planning Secretary or ER.		
I2S-02-OFI-03	**C36:** The results of the CMP(s) must be made publicly available in the form of a Construction Monitoring Report at the frequency identified in the relevant CMP.	Noise and vibration monitoring results are being reported quarterly; this misaligns to the frequency defined within the Construction Monitoring Program (6-monthly).	It is recommended that JHG review and confirm reporting requirements.
I2S-02-OFI-04	**E3:** Despite Conditions E1 and E2 work may be undertaken outside the hours specified in the following circumstances: (b) By approval or agreement, including: ii. where different construction hours are permitted or required under an EPL in force in respect of the CSSI;	The Out-Of-Hours-Work (OOHW) Permit sample showed ER approval as marked which is not a project requirement, with the permit unsigned by JHG and the Conditions of Approval section left blank.	It is recommended to ensure all OOHW permits are completed accurately and in full.
I2S-02-OFI-05	**E25:** Impacts to plant community types and species credit species must not exceed those identified in the documents listed in Tables in SCHEDULE 1 and SCHEDULE 2 of APPENDIX C and the corresponding number and class of ecosystem and species credits as set out in the BAM Biodiversity Credit Report which forms part of Condition A1(c).	The register for vegetation clearing which included the % proportion tracked was showing incorrect calculations. Additionally, the Fauna Capture Register stated NOT RELEASED under the date released column.	It is recommended that the register be reviewed and updated to reflect accurate information and for traceability purposes.

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
I2S-02-OFI-06	**E145: Condition Surveys and Rectification** 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. 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.	During the review of Condition Survey Register, it was identified that some cells were marked as red and some entries left blank. Although evidence was presented demonstrating surveys were submitted prior to commencement of construction, the register itself does not record the date of submission of condition surveys to landowners and agencies.	It is recommended that the register be reviewed and updated to ensure all fields are completed accurately, submission statuses are clearly defined, and relevant submission dates are captured.
I2S-02-OFI-07	**E163:** Waste generated during construction and operation is to be dealt with in accordance with the following priorities: (d) waste generation is to be avoided and where avoidance is not reasonably practicable, waste generation is to be reduced; (e) 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 (f) where re-using, recycling or recovering waste is not possible, waste is to be treated or disposed of in	The current waste tracking register does not distinguish between recycled and landfilled waste streams, limiting the ability to demonstrate waste diversion performance. While waste segregation bins were observed onsite during site inspection.	It is recommended that a monthly waste report be obtained from the contractor, clearly outlining the proportion of waste recycled versus landfilled, to effectively demonstrate waste performance and support sustainability reporting requirements, including ISC outcomes.

Audit Rating and Ref	Condition of Consent Details	Audit Finding Details	Recommendations & Close-Out
	accordance with Condition E165.		
I2S-02-OFI-08	**E165:** 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 site meeting applicable legislation and regulations, or to any other place that can lawfully accept such waste.	No waste was exported or transported offsite under a Resource Recovery Order in relation to vegetation clearing activities. Instead, cleared vegetation (e.g. logs and mulch) is being reused onsite, indicating positive resource recovery practices. However, the project did not capture or maintain quantitative records relating to the volumes of logs and mulch reused onsite.	It is recommended that, for future vegetation clearing activities, processes are implemented to record the data of logs and mulch for reuse opportunities.

Table 14- Detail of Audit Findings

Appendix A – Audit Agenda

Audit Agenda – Inland Rail Illabo to Stockinbingal (I2S)

Project	Independent Environmental Audit – Inland Rail Illabo to Stockinbingal (I2S)
Proponent	ARTC
Contractor	John Holland
Location	ARTC Office, Wagga Wagga
Date and Time	22 April 2026 2:00 PM – 5:30 PM 23 April 2026 7:00 AM – 4:30 PM 24 April 2026 7:00 AM – 11:00 AM
Auditing Team	Sanan Qasim (Lead Auditor) Barbara Pater (Alternate Lead Auditor)
Site contact	Patrick Thollar
Audit criteria	Development Consent SSI-9406, and in accordance with the Independent Audit Post Approval Requirements (IAPAR 2020)
Audit scope	Audit # 2 – Review of construction activities

Agenda

Item	Time
Day 1 – 22 April 2026 (ARTC Wagga Office)	
Opening Meeting ▶ Confirm scope of the audit, outline the audit process, methodology, timing, access, and resources required.	2:00 PM – 2:30 PM
Review of Consent Conditions SSI-9406:	
▶ Close-Out of Previous Audit Findings	2:30 PM – 3:00 PM
▶ Part A – Administrative Conditions ▶ Part B – Community Information, Consultation and Involvement ▶ Part C – Construction Environmental Management	3:00 PM – 5:30 PM
Day 2 – 23 April 2026 (Dirnaseer Rd Compound)	

Item	Time
Site Inspection ▶ Undertake site induction/sign on if required. ▶ Sight current construction activities and provide focus for the review of environmental aspects, impacts and controls (TBC on the day).	7:00 AM – 12:00 PM
Lunch break	12:00 PM – 12:30 PM
▶ Contd. Part C - Construction Environmental Management	12:30 PM – 1:45 PM
▶ Part E: Key Issue Conditions	1:45 PM – 4:30 PM
Day 3 – 24 April 2026 (ARTC Wagga Office)	
▶ Part E: Key Issue Conditions	7:00 AM – 11:00 AM
Closing Meeting – 28 April 2026 (TBD – Online)	
Closing Meeting ▶ Outcome of audit and presentation of findings. Deliverables as noted below.	11:00 AM – 12:00PM (TBD)

Deliverables

Audit Deliverables	Responsibility
Draft Report Submission ▶ 15 days following conduct of independent audit, or following additional documentation/evidence	BVBI
Response to draft report ▶ 7 days following receipt of draft audit report from BVBI	Inland Rail
Final report submission ▶ Finalised within 7 days following receipt of comments from Inland Rail ▶ Submitted to Inland Rail	BVBI

Audit Deliverables	Responsibility
Response to findings and submission of final audit report ► Final audit report submitted to the DPHI within 60 days	Inland Rail
Non-Compliances (if applicable) ► Inland Rail is to follow the process to notify DPHI within 7 days regarding any non-compliances raised during the audit. Refer to condition A36 of SSI-9406 for details.	Inland Rail

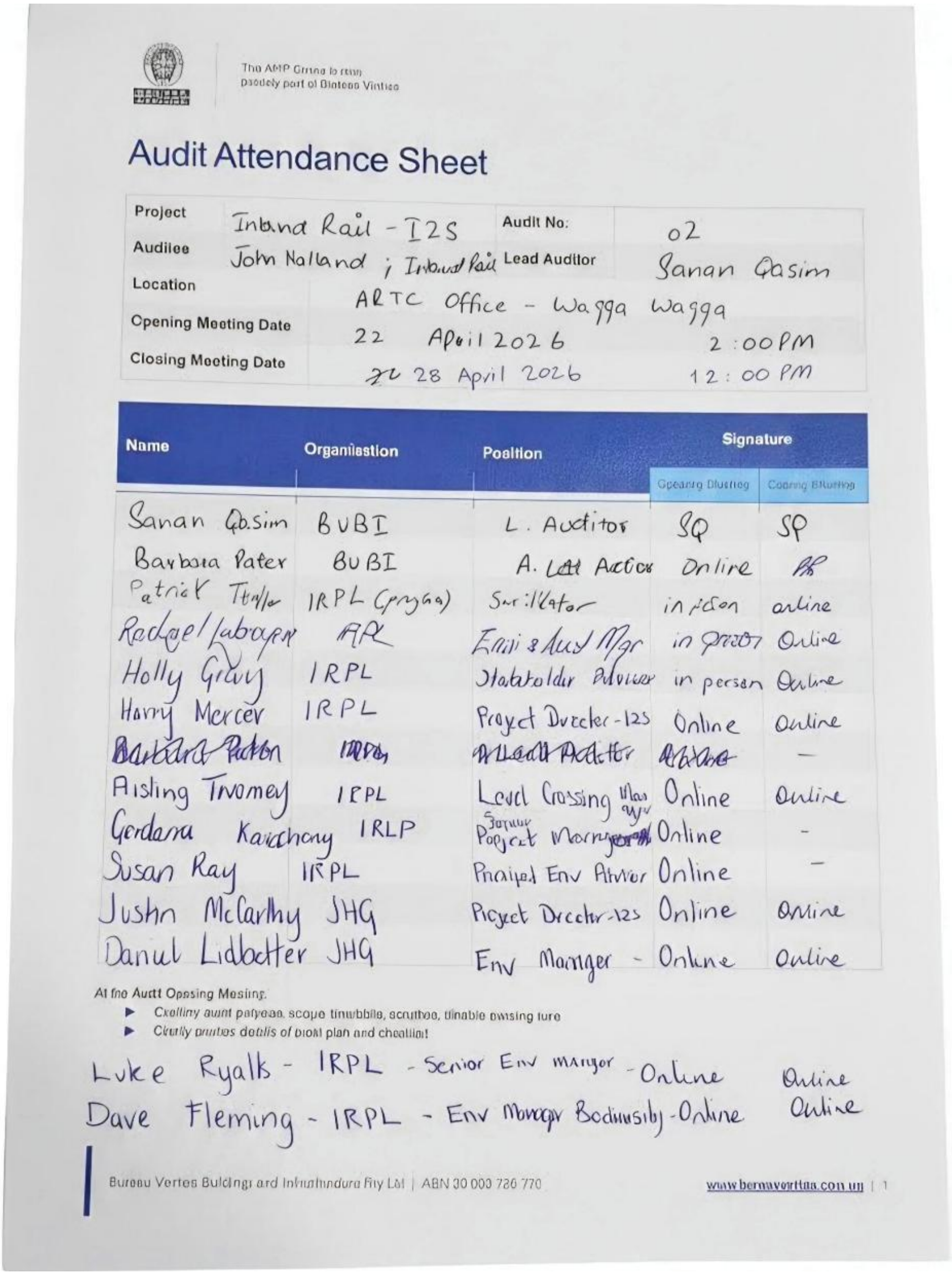
Limitations

A. The audit will cover the construction requirements and will therefore be limited to auditing the applicable conditions of Schedules 2, Parts A, B, C, E and Appendices in accordance with Development Consent Conditions SSI-9406.

B. The audit will cover a sampling of records relevant to the scope. BVBI auditors will apply their professional judgment based on the information made available during the audit.

C. BVBI will conduct the audit in accordance with the *Independent Auditing Post Approval Requirements* (IAPAR 2020) with the following ratings applied: Compliant, Non-Compliant and Not Triggered, with the option to raise any Opportunities for Improvement.

Appendix B – Audit Attendance Sheet



Audit Attendance Sheet

Project	Inland Rail - I2S	Audit No:	02
Auditee	John Nalland ; Inland Rail	Lead Auditor	Sanan Qasim
Location	ARTC Office - Wagga Wagga		
Opening Meeting Date	22 April 2026		2:00PM
Closing Meeting Date	~~22~~ 28 April 2026		12:00 PM

Name	Organiastion	Position	Signature	
			Opeanrg Dlustiog	Coanrg Blurtiog
Sanan Qasim	BUBI	L. Auditor	SQ	SQ
Barbara Pater	BUBI	A. Lead Auditor	Online	
Patrick Ttolla	IRPL (Gregg)	Surveillator	in person	online
Rachael Labrayen	ARL	Envi & Aud Mgr	in person	Online
Holly Grevy	IRPL	Stakeholder Advisor	in person	Online
Harry Mercer	IRPL	Project Director - I2S	Online	Online
~~Barbara Paton~~	~~IRPL~~	~~[illegible]~~	~~[illegible]~~	—
Aisling Twomey	IRPL	Level Crossing Man Mgr	Online	Online
Gordana Kavachony	IRLP	Senior Project Manager	Online	-
Susan Ray	IRPL	Principal Env Advisor	Online	—
Justin McCarthy	JHG	Project Director - I2S	Online	Online
Danul Lidbetter	JHG	Env Manager -	Online	Online

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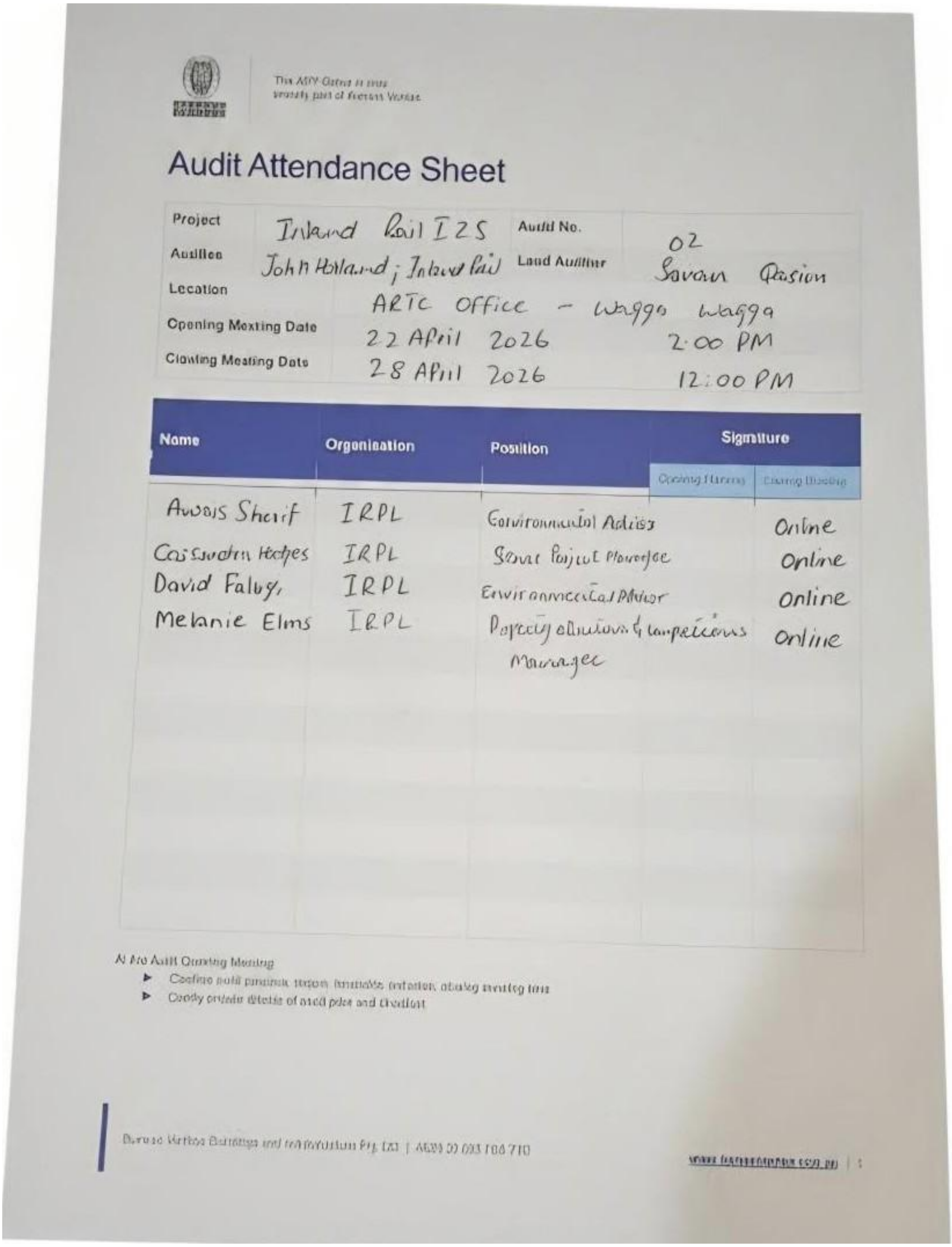
- Ckutly prutos detlis of biokl plan and cheallial!

Luke Ryalk - IRPL - Senior Env Manager - Online Online

Dave Fleming - IRPL - Env Manager Biodiversity - Online Online



The APP Group is now
proudly part of Bureau Veritas

Audit Attendance Sheet

Project	Inland Rail I2S	Audit No.	02
Auditee	John Holland; Inland Rail	Lead Auditor	Savan Pasion
Location	ARTC Office - Wagga Wagga		
Opening Meeting Date	22 April 2026		2:00 PM
Closing Meeting Date	28 April 2026		12:00 PM

Name	Organisation	Position	Signature	
			Opening Meeting	Closing Meeting
Awais Sharif	IRPL	Environmental Advisor		Online
Cassandra Hughes	IRPL	Senior Project Manager		Online
David Falugi	IRPL	Environmental Advisor		Online
Melanie Elms	IRPL	Property Acquisitions & Compensations Manager		Online

At the Audit Opening Meeting

- Confirm audit purpose, scope, timetable, criteria, closing meeting time
- Clarify any details of audit plan and checklist

Bureau Veritas Buildings and Infrastructure Pty Ltd | ABN 29 003 764 770

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Appendix C – Approval of Auditors

IRPL Ref: 6-0001-220-EEC-00-LT-0045

Department of Planning, Housing and Infrastructure

Reference: SSI-9406-PA-89

Mr Matt Mulcahy
Principal Environmental Advisor
AUSTRALIAN RAIL TRACK CORPORATION LIMITED
15/04/2026

Sent via the Major Projects Portal only

Subject: Illabo to Stockinbingal - Independent Environmental Audit Auditor Endorsement Request

Dear Mr Mulcahy

I refer to your request, seeking the Planning Secretary's approval of suitably qualified, experienced, and independent persons to conduct an Independent Environmental Audit for the Illabo to Stockinbingal Project SSI-9406 (Approval), submitted to NSW Department of Planning, Housing and Infrastructure (the Department) on 13 April 2026 as required by Schedule 2, Condition A28 of the Approval.

The Department has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed team from Bureau Veritas Buildings and Infrastructure (formerly the APP Group) are suitably qualified, experienced, and independent.

In accordance with Schedule 2, Condition A28 of the Approval and the Department's *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Sanan Qasim – Lead Independent Auditor
- Barbara Pater – Alternate Lead Independent Auditor
- Annabelle Tungol - Independent Auditor & Support
- Joseph Cacdac – Independent Auditor & Support

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of Approval and the Department's *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- Construction Audits – The above audit team is approved for the duration of construction and the initial operational audit of the development. However, the Department reserves the right to request an alternate auditor or audit team at any time.

- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.
- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

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 the Department, 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 Jennifer Rowe, (Senior Compliance Officer) on 0242471851 or email compliance@planning.nsw.gov.au.

Yours sincerely

Katrina O'Reilly
Team Leader - Compliance
Compliance
As nominee of the Planning Secretary

Appendix D – Independent Audit Declarations

Declaration of Independence Form

Independent Audit Declaration Form	
Project Name:	Inland Rail – Illabo TO Stockinbingal (I2S)
Consent Number:	SSI-9406
Description of Project:	Construction of a new 39km long direct route from east of Illabo tracking north to Stockinbingal in New South Wales.
Project Address:	Wallendoon Street, Cootamundra, NSW 2590
Proponent:	Australian Rail Track Corporation
Date:	13 May 2026

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
ii. the findings of the audit are reported truthfully, accurately and completely;
iii. I have exercised due diligence and professional judgement in conducting the audit;
iv. I have acted professionally, objectively and in an unbiased manner;
v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
vi. I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000; and
b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of the Auditor:	Sanan Qasim
Signature:	
Qualification:	Lead Environmental Auditor
Company:	Bureau Veritas Buildings & Infrastructure Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000
Declaration	We advise that Sanan Qasim is not part of the services provided under the Independent Verifier (IV) contract for the Albury to Parkes Project. Sanan is independent from the IV team and has no involvement in any IV-related activities. Sanan will provide Independent Environmental Auditor (IEA) services only for the project. To mitigate any potential conflict of interest, BVBI developed a probity plan to ensure there is an appropriate separation between the IV role and the IEA teams engagement, as well as address any probity risks that may otherwise arise during the project.

Declaration of Independence Form

Independent Audit Declaration Form	
Project Name:	Inland Rail – Illabo TO Stockinbingal (I2S)
Consent Number:	SSI-9406
Description of Project:	Construction of a new 39km long direct route from east of Illabo tracking north to Stockinbingal in New South Wales.
Project Address:	Wallendoon Street, Cootamundra, NSW 2590
Proponent:	Australian Rail Track Corporation
Date:	13 May 2026

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (Department 2020);
ii. the findings of the audit are reported truthfully, accurately and completely;
iii. I have exercised due diligence and professional judgement in conducting the audit;
iv. I have acted professionally, objectively and in an unbiased manner;
v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the Independent Audit, or by relationship as spouse, partner, sibling, parent, or child;
vi. I do not have any pecuniary interest in the project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, $1 million and for an individual, $250,000; and
b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Name of the Auditor:	Barbara Pater
Signature:	
Qualification:	Alternate Lead Environmental Auditor
Company:	Bureau Veritas Buildings and Infrastructure Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000
Declaration	We advise that Barbara Pater recently provided services under the Independent Verifier (IV) contract for the Albury to Parkes project, conducting reviews of the Construction Environmental Management Plan and Sub Plans for the works to be delivered for TfNSW under the Kemp / Olympic Highway WAD which forms a part of the A2I package. Barbara's involvement was limited to the review of one set of contractor management plans for compliance against the Contractor's contracted technical requirements. Barbara was not involved with implementing, approving, or verifying the works. To mitigate any potential conflict of interest, BVBI developed a probity plan to ensure there is an appropriate separation between the IV role and the IEA teams engagement, as well as address any probity risks that may otherwise arise during the project.

Appendix E – Audit Checklist

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
PART A ADMINISTRATIVE CONDITIONS						
GENERAL						
1.1	A	A1	The Proponent must carry out the CSSI in accordance with the terms of approval and generally in accordance with the: (a) Inland Rail – Illabo to Stockinbingal Environmental Impact Statement (ARTC 2022); (b) Illabo to Stockinbingal Project Response to Submissions (ARTC 2023); (c) Response to Submissions – Appendix E - Biodiversity Development Assessment Report version 12 (IRDJV, June 2024); (d) I2S – Mitigation Measures (Inland Rail, April 2024); (e) Illabo to Stockinbingal (SSI-9604) Additional and Appropriate Measures for Box Gum Woodland Impacts (Inland Rail, June 2024); and (f) Technical and Approvals Consultancy Services: Illabo to Stockinbingal – Box Gum Woodland Gum Flat Rehabilitation Opportunity (IRDJV, June 2024)	A review of the EIS and RtS (Actual versus Predicted Impacts) was undertaken as per Audit Report Section 6.6. Based on the outcome of this audit, evidence presented, and conditions onsite, the project appeared to be carried out generally in accordance with this approval, and with the EIS and RtS.		Compliant
1.2	A	A2	The CSSI must only be carried out in accordance with all procedures, commitments, preventative actions, performance criteria and mitigation measures set out in the documents listed in **Condition A1** unless otherwise specified in, or required under, this approval.	Mitigation measures are as reviewed under Audit Report Section 6.4 (Site Inspection) with six observations raised onsite. Refer to photos contained within Appendix G of the audit report. Based on a review of the current management plans, monitoring programs, procedures and mitigation measures being implemented, seven non-compliances		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				(including self-reported non-compliances) and eight improvement opportunities were identified.		
1.3	A	A3	In the event of an inconsistency between: (a) the terms of this approval and any document listed in **Condition A1** inclusive, the terms of this approval will prevail to the extent of the inconsistency; and (b) any document listed in **Condition A1** inclusive, the most recent document will prevail 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.*	The following Consistency Assessments were presented as evidence: Consistency Assessment (Minor) – Construction Gates Project Wide, Rev. 0, document no. 6-0019-220-EEC-00-SD-0001, dated 6 February 2026. Consistency Assessment (Minor) – Grogan Road Utility Access Track, rev. 0, document no. 6-0019-220-EEC-00-RP-0006, dated 23 February 2026. IRPL confirmed during the audit interview that Consistency Assessments are reviewed by the ER only, and are not required for DPHI approval. As contained within the December 2025 ER Monthly Report: Three Consistency Assessments (CAs) were determined by Inland Rail during the reporting period: - Consistency Assessment (Minor) – Combined Services Route Works		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				• Consistency Assessment (Minor) – Dudauman Rd RMAR Access • Consistency Assessment (Minor) – Rail Unloading Activities. As sighted within the March 2026 ER Monthly Report: Two Consistency Assessments (CA) were determined by Inland Rail during the reporting period: • Consistency Assessment (Minor) – Grogan Road Utility Access Track | Rev 0 | Document Number: 6-0019-220-EEC-00-RP-0006 | Date: 25 March 2026. • Consistency Assessment (Minor) – Construction Gates Project Wide | Rev 0 | Document Number: 6-0019-220-EEC-00-SD-0001 | Date: 25 March 2026		
1.4	A	A4	The Proponent must comply with all written requirements or directions of the Planning Secretary, including in relation to: (a) the environmental performance of the CSSI; (b) any document or correspondence in relation to the CSSI; (c) any notification given to the Planning Secretary under the terms of this approval;	IRPL and JHG confirmed during the audit interview that no formal written directions were received during the audit period. However, several RFIs were received from DPHI with evidence recorded as per the following conditions:		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(d) any audit of the construction or operation of the CSSI; (e) the terms of this approval and compliance with the terms of this approval (including anything required to be done under this approval); (f) the carrying out of any additional monitoring or mitigation measures; and (g) 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.	**Condition A34** - RFI letter from DPHI ref. SSI-9406-PA-67, dated 14 January 2026, requesting the detailed investigation report by 30 January 2026 Email from DPHI, dated 29 January 2026, confirming extension of submission of investigation report by 4 February 2026 IRPL Response to DPHI's RFI request, dated 4 February 2026 – includes details of investigation; primary cause identified as delay in schedule and preclearance survey conducted outside of Superb Parrot breeding season. **Condition E61** – Sighted RFI Comment Sheet "SSI-9406-PA-52 ETV Report RFI-104848474_260216" First RFI: issued 22 October 2025, responded to 16 December 2025 Second RFI: issued 30 January 2026, responded to 16 February 2026 by John Holland Email from IRPL to DPHI, dated 8 April 2026, providing comments on figure A06 of ETVR		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Email from IRPL dated 24 April 2026, providing responses to DPHI's RFI feedback. **Condition E64** - RFI request from DPHI, dated 30 March 2026, regarding the low risk culverts. Response sheet "I2S DPHI criterial low High Risk Drainage Culverts Project Response 20260409", dated 9 April 2026 – submitted to DPHI on 13 April 2026. **Condition E88** - An RFI was received from DPHI, dated 7 April 2026 ref. SSI-1055-PA-180, requesting clarification on level crossings in Junee, including the endorsement status from Junee Council. IRPL is currently preparing a response to address DPHI's comments.		
1.5	A	A5	References in the terms of this approval to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, Australian Standards or policies in the form they are in as at the date of this approval.	Construction Environmental Management Plan Rev. 2, document no. 5-0019-220-PMA-00-PL-0037, dated 10 September 2025 reviewed as part of this audit was verified to include Appendix A1 Legal Requirements which lists the relevant acts and regulations.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.6	A	A6	This approval lapses five (5) years after the date on which it is granted, unless work has physically commenced on or before that date.	The Infrastructure Approval for the Inland Rail – Illabo to Stockinbingal was granted on 4 September 2024 as per Schedule 1, SSI-9406. The notification letter to DPHI, dated 11 August 2025, confirmed that the construction was anticipated to commence on 9 September 2025, within the 5 year requirement. The approval has therefore not yet lapsed.		Not Triggered
NOTIFICATION OF COMMENCEMENT						
1.7	A	A7	The Department must be notified in writing of the dates of commencement of Work (in relation to low impact works), construction and operation at least one (1) month before those dates.	Submission of construction commencement was reviewed during the initial audit. This condition will become triggered upon prior to commencement of operation notification. No new stages have been introduced during the audit period.		Not Triggered
1.8	A	A8	If the construction or operation of the CSSI is to be staged, the Department must be notified in writing of the date of the commencement of each stage, at least one (1) month before the commencement of that stage.	Prior to commencement notification was reviewed as compliant during the initial audit. This condition will become triggered upon prior to commencement of operation notification.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
TIMING AND APPROVALS						
1.9	A	A9	Any document that must be submitted or action taken within a timeframe specified in or under the terms of this approval, may be submitted or undertaken within a later timeframe agreed in writing with the Planning Secretary. This condition does not apply to the notification required in respect of an incident under **Condition A34.**	Sighted DPHI Letter ref. SSI-9406-PA-69, dated 20 January 2026, confirming the extension until 31 March 2026 for the timeframe to apply for a Biodiversity Stewardship Agreement as required under condition E34. Sighted DPHI letter ref. SSI-9406-PA-64, dated 11 December 2025, confirming the extension of final Fauna Connectivity Strategy until 28 February 2026 as required under condition E44. Sighted extension letter from DPHI ref. SSI-9406-PA-55, dated 11 December 2025, confirming to defer the following requirement to prior to operation phase: • written agreements with landowners until prior to operation as they relate to condition E65(d), E58(d), E65(f) and E65(j). As noted in condition E65(d) written agreements may be provided to the Planning Secretary separately. • implementation of identified mitigation measures as identified in the OEMMP as they relate to		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				condition E70(a) until prior to operation. - Sighted DPHI letter Ref. SSI-9406-PA-61, dated 26 November 2025, confirming that the ER Monthly Report for December 2025 is required to be submitted by 14 January 2026. - Sighted email from DPHI, dated 29 January 2026, confirming the extension of submission of investigation report for superb parrot incident by 4 February 2026.		
1.10	A	A10	Where the terms of this approval require consultation to be undertaken, evidence of the consultation undertaken must be submitted to the Planning Secretary and ER (as relevant) with the corresponding documentation. The evidence must include: (a) documentation of the engagement with the identified party 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	Consultation for the preparation of CEMP and Sub-plans has been mainly actioned as reviewed during the previous audit. Consultation under the terms of this approval continued throughout the audit period and was evidenced through documents prepared, submitted or progressed during the period, each containing consultation sections and logs. Evidence sighted during this audit period includes:		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			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.	• C 21 – CTTAMP Rev. 0.1 – submitted to Junee Shire Council (Aconex ref. IR2200-TRANSMIT-002509) and TfNSW (Aconex ref. IR2200-TRANSMIT-002507) on 13 April 2026 for review. • E10 – Blast Management Strategy Rev. 1 (document no. 5-0019-220-PMA-00-ST-0004, dated 20 March 2026) – submitted to DPHI on 2 April 2026 for review. DPHI RFI received via SSI-9406-PA-82 dated 21 April 2026 with comment sheet (engagement ongoing). • E44 – Revised Draft Connectivity Strategy Rev. G (document no. 5-0000-220-PMA-00-PL-0000, dated 25 February 2026) – provided to CPHR and DPI Fisheries for consultation; subsequent site visit on 19 March 2026 and meeting on 25 March 2026 attended by DPHI, CPHR and the WSP. • E63 – Erosion Threshold Velocity Report Rev. 2 by Landloch (document no. 5-0019-220-PEN-00-RP-0024, dated 12 April 2026)		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				- draft submitted to DPHI on 15 April 2026 via email; ongoing discussions with DPHI through weekly meetings regarding the FDVR and ETV Report. • E 88 – Public Level Crossing Treatment Report Rev. 0 (document no. 5-0019-220-CXR-00-RP-0002, dated 1 April 2026) — Appendix F 'Road Authority Endorsement of LX Design' contains TfNSW and road authority endorsements; submitted to DPHI under SSI-9406-PA-84 on 7 April 2026. A DPHI RFI seeking clarification on Junee Council endorsement is currently being addressed by IRPL. • E89 – Private Level Crossing Treatment Report Rev. 0 (document no. 5-0019-220-CXR-00-RP-0001, dated 20 April 2026) — Section 5 'Consultation' and Appendix A 'Consultation Outcomes' document landowner engagement. Private Crossing Design Criteria Forms signed by six (6) landowners (evidenced via		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				IRPL Stakeholder Engagement Officer email dated 23 April 2026). - E133 – Aboriginal Cultural Values Plan (ACVP) Rev. 0 (document no. 5-0019-220-PMA-00-PL-0067, dated 23 January 2026), approved by DPHI under SSI-9406-PA-59 dated 23 February 2026 - ACVP Consultation Log updated by AOHC and circulated to RAPs via email dated 22 January 2026.		
STAGING						
1.11	A	A11	The CSSI may be constructed and operated in stages (including but not limited to temporal, location or activity based staging). 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 Planning Secretary for approval. The **Staging Report** must be submitted to the Planning 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).	Staging Report Rev. 0, document no. 5-0019-220-EEC-00-RP-0021, dated 8 September 2025, was sighted. The initial staging report (29/08/2025) was submitted to DPHI with the DPHI letter (ref. SSI-9406-PA-43) dated 2 September 2025 confirming the approval of Staging Report. Sighted I2S Monthly Environmental Meeting, dated 8 August 2025, confirming the timeline of staging report to be approved by 8 September 2025.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.12	A	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 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 details of 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 with 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.	The Staging Report satisfies this condition by addressing these items in the following sections of the plan: a) Section 3 “Project Staging” outline the project stages and describes works activities. b) Operation is not applicable at this stage. c) Section 5 ‘Compliance’ of the Staging Report provides a breakdown of compliance with conditions across various stages of the project. d) Section 3.5 ‘Cumulative Impacts’ provides information on cumulative impacts including noise and traffic mitigation.		Compliant
1.13	A	A13	Where staging is proposed, the CSSI must be staged in accordance with the **Staging Report** and submitted for information to the Planning Secretary.	The Inland Rail – Illabo to Stockinbingal project is currently being delivered under Stage 2 as per Staging Report Rev. 0, document no. 5-0019-220-EEC-00-RP-0021, dated 8 September 2025. During the audit period, following works had occurred: • Clearing and Grubbing activity • General Earthworks • Piling works • Services works		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.14	A	A14	Where staging is proposed, the terms of this approval that apply or are relevant to the work or activities to be carried out in a specific stage must be complied with at the relevant time for that stage.	Section 3 'Compliance' of the Staging Report provides a breakdown of compliance with conditions across various stages of the project. The current stage 2 of the works are as follows: • Clearing near completion • Utility relocation works in progress • General Earthworks in progress • Water relocation works at 2 of 4 locations • Piling at Run Boundary Creek • Piling completed at Dirnaseer Road		Compliant
1.15	A	A15	Where changes are proposed to the staging of construction or operation, a revised Staging Report must be prepared and submitted to the Planning Secretary for approval no later than one (1) month prior to the proposed change in the staging.	IRPL and JHG confirmed during the audit interview that there have been no revisions of the Staging Report required.		Not Triggered
1.16	A	A16	Should a **Construction Environmental Management Framework (CEMF)** be submitted for approval under **Condition C1**, the Staging Report must be submitted with the **CEMF**, i.e. no later than one month before the lodgment	As evidenced during the initial audit, elements of the CEMF are included in the Staging Report and are as agreed with DPHI. Sighted I2S Monthly Environmental		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			of any **CEMP**, **CEMP sub plan or CMP** to the Planning Secretary for approval.	Meeting, dated 8 August 2025, confirming that CEMF is not required. This condition is no longer triggered.		
LOW IMPACT WORK						
1.17	A	A17	Prior to the commencement of low impact work, an **Unexpected and Incidental Finds Protocol** must be developed for: (a) threatened species and threatened ecological communities; (b) contamination, hazards and contaminated land; (c) Aboriginal Cultural Heritage; and (d) non-Aboriginal Heritage. The **Unexpected and Incidental Finds Protocol** must include procedures for: (i) all Work in the associated location to stop to prevent further impact; and (ii) notifying the Planning Secretary and relevant state agencies in writing. Work must not recommence until the relevant state agencies have been consulted and any required approvals have been obtained. The **Unexpected and Incidental Finds Protocol** must be made publicly available prior to low impact work commencing and must be implemented during low impact work.	Prior to commencement condition was reviewed as compliant during the initial audit. This condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
TEMPORARY WORKFORCE ACCOMMODATION FACILITIES						
1.18	A	A18	The Proponent must prepare a **Temporary Accommodation Facility Management Plan** in consultation with the relevant council, and emergency services. The **Plan** must be endorsed by the **Environmental Representative** and submitted to the Planning Secretary for approval one (1) month prior to establishment of the accommodation facility by construction personnel commences. The Plan must include: (a) site layout including building locations and outdoor recreation areas, vehicle access, movement and parking, site servicing and utilities infrastructure including the requirements of **Conditions E111** and **E112**; (b) management and emergency provisions including staff roles and responsibilities, provision of security and paramedic staff required by **Condition E112**, communication procedures with emergency services, and community consultation and complaints processes consistent with the **Communication Strategy** required by **Condition B1** and the **Complaints Management System** required by **Condition B6**; (c) measures to minimise noise and lighting amenity impacts on adjacent residents including limitations on use of outdoor recreation areas required by **Condition E114**; (d) the code of conduct as required by **Condition E117** for all users of the accommodation facility; and (e) arrangements for servicing the accommodation facility (including in terms of food, water, wastewater, waste	Temporary Accommodation Facility Management Plan document reference: 5-0019-220-PMA-00-PL-0051, revision 0, dated 8 August 2025 was presented as evidence. ER endorsement letter, dated 12 August 2025, confirming the endorsement of TAFMP was sighted. Post approval receipt ref. SSI-9406-PA-41, dated 14 August 2025 was also sighted. DPHI approval letter, dated 29 August 2025, confirming the approval of TAFMP was presented. The letter also notes the initial submission on 30 July 2025. The TAFMP satisfies this condition by addressing these items in the following sections of the plan: (a) As per section 4.3 'Site Layout and features', section 4.4 'Design Considerations' and Appendix A 'Temporary Accommodation Facility Plans'. (b) As per section 5.2 'Management and Emergency Services Provision', section 5.7		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			collection and cleaning and maintenance). The Plan must: (i) outline the provisions for and anticipated frequency and timing of servicing (including food and water deliveries and waste and wastewater collection); (ii) detail the location and facilities to store water, waste and wastewater; (iii) include cleaning and maintenance provisions, including the frequency and range of duties; and (iv) detail the measures that the Proponent would implement to support local suppliers and services in the operation of the accommodation facility. The approved Temporary Workforce Accommodation Management Plan(s) must be implemented. ***Note****: The Temporary Workforce Accommodation Facility Management Plan is not part of the CEMP required by Condition C12.*	'Communications' and section 7.1 'Roles and Responsibilities' (c) Measures outlined in section 4.4.1.1 'Noise' and section 4.4.1.2 'Lighting'. (d) Code of conduct under section 5.7.1.3 'Employee Behaviour guidelines and expectations' (e) As per section 5.1 'Servicing Arrangements', section 5.3 'Operation of Utilities, and section 4.4.3 'Social Impact Considerations'.		
INDEPENDENT APPOINTMENTS						
1.19	A	A19	All **Independent Appointments** required by the terms of this approval must have regard to *Seeking approval from the Department for the appointment of independent experts* (DPIE, 2020). All **Independent Appointments** must hold current membership of a relevant professional body, unless otherwise agreed by the Planning Secretary.	An update to the audit team was approved by DPHI ref. SSI-9406-PA-89 on 15/04/2026 to endorse Sanan Qasim as the Lead Auditor and Barbara Pater as Alternate Lead Auditor. A copy of the correspondence is attached to Appendix C of this report.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.20	A	A20	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.	DPHI have not requested any audits on independent appointments as confirmed by IRPL during the audit interview.		Not Triggered
1.21	A	A21	The Planning Secretary may withdraw its approval of an **Independent Appointment** should they consider the **Independent Appointment** has not exercised their functions in accordance with this approval.	IRPL advised during the audit interview that there have been no withdrawals to date.		Not Triggered
ENVIRONMENT REPRESENTATIVE						
1.22	A	A22	Work must not commence until an **Environmental Representative (ER)** has been nominated by the Proponent and approved by the Planning Secretary.	Works commenced following DPHI approval of the ER as previously evidenced. Timing of this condition is no longer triggered.		Not Triggered
1.23	A	A23	The Planning Secretary's approval of an **ER** must be sought no later than one (1) month before the commencement of work.	ER approval in place as verified during initial audit. Timing of this condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.24	A	A24	The proposed **ER** must meet the requirements of the *Environmental Representative Protocol* (Department of Planning and Environment, October 2018) and must be a suitably qualified and experienced person(s) who was not involved in the preparation of the documents listed in **Condition A1**, and is independent from the design and construction personnel for the CSSI and those involved in the delivery of it. . The ER must meet the requirements of the *Environmental Representative Protocol* (DPE, October 2018). The appointment of the ER must have regard to Seeking approval from the Department for the appointment of independent experts (DPIE, 2020).	DPHI letter as evidenced during the initial audit approving alternative ER dated 11 September 2024. The letter confirmed that the supported CV demonstrates the skills, qualification and experience to undertake the role, that there was no involvement in the preparation of the EIS, etc as per CoA A1 as per initial audit evidence. As based on the initial audit, and a review of the ER reports + inspections evidence to date, this condition is considered satisfied and is no longer triggered. It is noted that compliance with this condition would be reassessed should there be any changes to the ER team.		Not Triggered
1.25	A	A25	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 Planning Secretary for the purposes of the CSSI.	The ER team (lead and alternates) engaged on the project are unchanged from initial audit as based on the audit interviews to date and review of ER monthly reports, site inspection reports, and meeting minutes as sighted. This condition is therefore not triggered at the time of this audit. It is noted that compliance with this condition would be reassessed should there be any changes to the ER team.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.26	A	A26	For the duration of Work and for no less than twelve (12) months after the completion of construction of the CSSI, 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, A18, B1, C5, C12, C17, C27** and **E109,** and any other documents that are identified by the Planning 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); (iii) provide a written statement / submission via the Major Projects portal to the Planning Secretary	Monthly Reports by the approved ER from Wolfpeak were presented as evidence for the 6-month period as follows: - ER Monthly Report November 2025, dated 5 December 2025 - ER Monthly Report December 2025, dated 14 January 2026 - ER Monthly Report January 2026, dated 6 February 2026 - ER Monthly Report February 2026, dated 7 March 2026 - ER Monthly Report March 2026, dated 7 April 2026 Evidence that the ER has met conditions a) – j) include: (a) Monthly meetings continue to occur with DPHI as listed within the section 4.2.6“Meetings” of the ER Monthly Reports e.g. DPHI, IRPL, JH and ER meeting, dated 15 December 2025. (b) The ER informs DPHI on matters specific to the approval during monthly meetings + submission of monthly ER reports. (c) Improvements are provided during ER inspections. ER categorises actions (low - green, medium -		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			advising the documents have been endorsed by the ER; (e) regularly monitor the implementation of the documents listed in Conditions **A11, A18, B1, C5, C12, C17, C27** and **E109** 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 or attend 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 **A28** of this approval; (g) as may be requested by the Planning Secretary, assist in the resolution of community complaints; (h) assess the impacts of minor ancillary facilities as required by **Condition C9** 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	amber, high - red). Sighted 9 April 2026 ER inspection report – Table 3: Issues and actions raised includes status of actions. One high action raised Ref 260409_02 raised 9 April 2026 as per Soil and Water MP (Appx C ESC Strategy) – PESCP to be developed for Unnamed Creek; actioned by CPESC Treestone Environmental “McKenzies Creek” 11/04/26. Includes mulch berm, water diversion bunds, minor drainage path with areas to be stabilised with geofabric or polymer binder. ACT 260406_02 reviewed as part of the ER inspection 22 April 2026. (d) The ER reviews and endorses documents as demonstrated under monthly reports e.g. Monthly Report for February 2026 states that “*No CEMP or Sub-plan documents were required to be endorsed or approved by the ER during the reporting period”.* (e) Monitoring of implementation is undertaken during ER inspections		

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			"Environmental Representative Monthly Reports. The Environmental Representative Monthly Report must be submitted within seven (7) days following the end of each month for the duration of the ER's engagement for the CSSI.	e.g., site inspection, dated 18 February 2026, raised 4 observations regarding site specific progressive ESCPs, implementation of erosion and sediment controls and clear timber to be retained for reuse. (f) IRPL confirmed during the audit interview that there have been no requests from DPHI for the ER to plan or attend audits of the development commissioned. Wolfpeak provided feedback in response to a consultation request by Lead Auditor for the second IEA on 10 April 2026. (g) IRPL confirmed during the audit interview that no assistance from the ER has been required in the resolution of any complaints. (h) IRPL and JHG confirmed during the audit interview that no minor construction ancillary facilities required assessment during audit period. IRPL and JHG confirmed during the audit period that multiple MAFs were implemented		

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				in accordance with the CEMP. One minor adjustment required for MAF23 and MAF32 but still under assessment and not yet finalised. (i) IRPL and JHG confirmed during the audit interview that no minor changes to CEMP, Sub-Plans and CMPs noted during the audit period; however, 6-monthly review upcoming. CTTAMP now with Junee and awaiting review. (j) Submission to DPHI sighted: Portal receipt ref SSI-9406-PA-61 dated 25 November 2025: request to extend ER December 2025 monthly report to 14 January 2026. Sighted DPHI letter Ref. SSI-9406-PA-61, dated 26 November 2025, confirming that the ER Monthly Report for December 2025 is required to be submitted by 14 January 2026. Sighted ER December report submission to DPHI via email dated 14 January 2026. Additionally, sighted ER		

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				March Report submission to DPHI via email dated 7 April 2026.		
1.27	A	A27	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 A26** (including preparation of the **ER** Monthly Report), as well as: (a) the complaints register (to be provided on a weekly basis, where complaints have been recorded, or as requested); 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).	(a) Sighted email trail from 17 April 2025 to 13 April 2026, confirming the weekly submission of Complaints Register from IRPL to ER. (b) The following Consistency Assessments were presented as evidence: - Consistency Assessment (Minor) – Construction Gates Project Wide, Rev. 0, document no. 6-0019-220-EEC-00-SD-0001, dated 6 February 2026. - Consistency Assessment (Minor) – Grogan Road Utility Access Track, rev. 0, document no. 6-0019-220-EEC-00-RP-0006, dated 23 February 2026. IRPL confirmed during the audit interview that Consistency Assessments are reviewed by the ER only, and are not required for DPHI approval. As contained within the December 2025 ER Monthly Report:		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Three Consistency Assessments (CAs) were determined by Inland Rail during the reporting period: • Consistency Assessment (Minor) – Combined Services Route Works • Consistency Assessment (Minor) – Dudauman Rd RMAR Access • Consistency Assessment (Minor) – Rail Unloading Activities. As sighted within the March 2026 ER Monthly Report: Two Consistency Assessments (CA) were determined by Inland Rail during the reporting period: • Consistency Assessment (Minor) – Grogan Road Utility Access Track | Rev 0 | Document Number: 6-0019-220-EEC-00-RP-0006 | Date: 25 March 2026. • Consistency Assessment (Minor) – Construction Gates Project Wide | Rev 0 | Document Number: 6-0019-220-EEC-00-SD-0001 | Date: 25 March 2026		
AUDITING						

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.28	A	A28	Proposed independent auditors must be agreed to in writing by the Planning Secretary before the commencement of an **Independent Audit**. This condition does not apply to the engagement of auditors required under **Condition E106.**	An update to the audit team was approved by DPHI ref. SSI-9406-PA-89 on 15/04/2026 to endorse Sanan Qasim as the Lead Auditor and Barbara Pater as Alternate Lead Auditor. A copy of the correspondence is attached to Appendix C of this report.		Compliant
1.29	A	A29	**Independent Audits** of the CSSI must be conducted and carried out in accordance with the *Independent Audit Post Approval Requirements* (DPIE, 2020).	This is the second independent audit on this project. This audit was undertaken as per the IAPAR 2020 guidelines within 26-weeks of the previous audit (26 November 2025).		Compliant
1.30	A	A30	The Planning Secretary may require the initial and subsequent **Independent Audits** to be undertaken at different times to those specified in the *Independent Audit Post Approval Requirements* (DPIE, 2020), upon giving at least four (4) weeks' notice (or timing as stipulated by the Planning Secretary) to the Proponent of the date upon which the audit must be commenced.	IRPL confirmed during the audit interview that no requests have been received.		Not Triggered
1.31	A	A31	In accordance with the specific requirements in the Independent Audit Post Approval Requirements (DPIE, 2020), the Proponent must: (a) review and respond to each **Independent Audit Report** prepared under Condition A30; (b) submit the response to the Planning Secretary; and	In accordance with the IAPAR 2020, the following was verified as part of this audit: (a) Review and response email from IRPL to auditors, email dated 7 January 2026 in response to draft		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(c) make each **Independent Audit Report** and response to it publicly available two months after submission to the Planning Secretary, or as otherwise agreed by the Planning Secretary.	V0. Finalised report dated 13 January 2026. (b) Sighted submission letter of IEA no. 1 and Response, dated 9 February 2026. Sighted Aconex submission ref. IR2200-RECCO-000096, dated 9 February 2026. Sighted post approval receipt SSI-9406-PA-76, dated 9 February 2026. (c) Independent Audit Report no. 1 and response to audit findings was made publicly available as sighted on the project website.		
1.32	A	A32	**Independent Audit Reports**, and the Proponent's response to audit findings, must be submitted to the Planning Secretary within two (2) months of undertaking the independent audit site inspection as outlined in the Independent Audit Post Approval Requirements (DPIE, 2020) unless otherwise agreed by the Planning Secretary.	Sighted submission letter of IEA no. 1 and Response, dated 9 February 2026. Sighted letter from DPHI ref. SSI-9406-PA-70, dated 28 January 2026, confirming the extension of audit report by 9 February 2026. Sighted report submission via Aconex ref. IR2200-RECCO-000096, dated 9 February 2026. Sighted post approval receipt SSI-9406-PA-76, dated 9 February 2026.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
1.33	A	A33	Notwithstanding the requirements of the *Independent Audit Post Approval Requirements* (DPIE, 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.	The project is still in construction phase. The operational stage has not yet commenced.		Not Triggered
INCIDENT NOTIFICATION AND REPORTING						
1.34	A	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.	One reportable incident occurred during the audit period as follows: On 2 December 2025, three juvenile Superb Parrots were identified in a felled tree during clearing and grubbing activities within the construction boundary at chainage 436.82 off Dirnaseer Road. The tree had previously been identified as a habitat tree during pre-clearance surveys undertaken by the project ecologist (OzArk) in August 2025. It was recorded in the pre-clearance survey report and clearly marked on-site with pink paint. Sighted pre-clearance report, dated 26 September 2025, confirming that the superb parrots were observed in section 2, 3, 4 and 5. Recommendations were also provided "*Hollow-bearing trees observed to contain, or potentially contain threatened species*		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				(such as Superb Parrot and Brown Treecreeper (eastern subspecies)), should not be cleared until after the juveniles and adults have left the nest, as per the Unexpected Finds Protocol". Sighted signed copy of Clearing Permit PER/12S/00161 for the duration from 24 November 2025 to 31 December 2025. Sighted the Commencement of Clearing and Grubbing Inspection (Location: Gate 6B – Dirnaseer to Dudauman Lane), dated 27 November 2025. The Clearing and Grubbing Map is included in the attachments, along with photographs of flagging. A Hold Point release is also included in the attachments. Sighted Hold Point Release JH-HP-000029 from IRPL via Aconex ref. IR2200-RTHP-000026, dated 21 November 2025, confirming the release of the Hold Point. The project ecologist safely contained the Superb Parrots in a fauna transport container for transfer to a care facility. All three superb parrots were observed to be uninjured at the time of capture. The ecologist notified the John Holland (JH) environment team, who initiated the		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Unexpected and Incidental Finds Procedure for Biodiversity. The parrots were subsequently transported by the project ecologist to a local veterinarian in Cootamundra, where all three superb parrots were assessed and confirmed to be in good health. Sighted email from OzArk, dated 3 December 2025, providing the details and timeline of the incident. The incident was initially reported verbally to DPHI on 3 December 2025, followed by formal notification on 5 December 2025 via Aconex ref: IR2200-RECCO-000078 in accordance with the Unexpected and Incidental Finds Procedure. Sighted notification letter ref: 6-0000-220-EEC-00-LT-0056, dated 5 December 2025. Additionally, sighted post-approval receipt SSI-9406-PA-67,dated 5 December 2025. Sighted RFI letter from DPHI ref. SSI-9406-PA-67, dated 14 January 2026, requesting the detailed investigation report by 30 January 2026. Sighted email from JHG, dated 15 December 2025, confirming that the DPHI categorised/initiated it as a notifiable incident.		

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				Sighted incident notification to DPHI dated 19 December 2025 in accordance with Appendix A, submitted as a notifiable incident. The notification included details of the incident, implementation of mitigation measures, and further actions being undertaken. It also noted that the fledgling Superb Parrots were uninjured and, following care and assessment by a licensed wildlife carer, were successfully released on 11 December 2025. Sighted email from DPHI, dated 29 January 2026, confirming the extension of submission of investigation report by 4 February 2026. Sighted IRPL Response to DPHI's RFI request, dated 4 February 2026. The response includes the details of the investigation conducted by IR. The primary cause of the incident was the delay in schedule and preclearance survey being conducted outside of the Superb Parrot breeding season, and management of change associated with that delay.		
1.35	A	A35	Subsequent notification must be given, and reports submitted in accordance with the requirements set out in **APPENDIX A**.	The incident was initially reported verbally to DPHI on 3 December 2025, followed by formal notification on 5 December 2025 via Aconex ref: IR2200-RECCO-000078 in accordance with the Unexpected and		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			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.	Incidental Finds Procedure. Sighted notification letter ref: 6-0000-220-EEC-00-LT-0056, dated 5 December 2025. Additionally, sighted post-approval receipt SSI-9406-PA-67,dated 5 December 2025. Sighted email from JHG, dated 15 December 2025, confirming that the DPHI categorised/initiated it as a notifiable incident. Sighted incident notification to DPHI dated 19 December 2025, submitted as a notifiable incident. The notification included all the required information including details of the incident, implementation of mitigation measures, and further actions being undertaken. Sighted RFI letter from DPHI ref. SSI-9406-PA-67, dated 14 January 2026, requesting the detailed investigation report by 30 January 2026. Sighted email from DPHI, dated 29 January 2026, confirming the extension of submission of investigation report by 4 February 2026. Sighted IRPL Response to DPHI’s RFI request, dated 4 February 2026. The response includes the details of the investigation conducted by IR. The primary		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				cause of the incident was the delay in schedule and preclearance survey being conducted outside of the Superb Parrot breeding season, and management of change associated with that delay. Sighted initial notification submitted to DCCEEW, dated 4 December 2025. Sighted notifiable incident notification submitted to DCCEEW, dated 17 December 2025.		
NON-COMPLIANCE NOTIFICATION						
1.36	A	A36	The Planning Secretary must be notified via the Major Projects website within seven days after the Proponent becomes aware of any non-compliance. The notification must identify the CSSI (including the application number and the name of the CSSI if it has one), identify the condition/s against which the CSSI is non-compliant, the nature of the non-compliance; the reason for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	**Non-Compliance Notification C26 & E86:** Sighted self-reported non-compliance notification from IRPL to DPHI against condition C26 & E86, dated 25 March 2026. On the 19 March 2026, during the DPHI and CPHR site inspection, the use of Gate 1 was highlighted by DPHI as an unapproved access point in the CTTAMP. At the time, JHG confirmed use of the gate (which had commenced during the set-up for the February Possession) and outlined that the CTTAMP was to be updated to include the access point in the 6-month review cycle which had been agreed with	**Note:** The non-compliance against Condition C20 and C21 was notified to the Planning Secretary via the Major Projects website eight (8) days after IRPL became aware of the non-compliance. While this is one day outside the seven (7) day timeframe specified in Condition A36, it is noted that the seven-day period spanned a	Compliant

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				the ER. JHG also detailed the access gate was included in a Consistency Assessment (CA) on the Inland Rail website. The CTTAMP was not updated prior to the use of the gate and access track (regardless of the CA); therefore, a non-compliance with MCoA C26 and the CTTAMP was identified. IRPL became aware of the non-compliance on 19 March 2026. Immediate actions undertaken included commencing an update of the CTTAMP to incorporate Gate 1 and Gate 2, and ceasing the use of Gate 1 until the CTTAMP has been updated. Sighted submission of the non-compliance notification as per post approval receipt SSI-0406-PA-81 dated 25 March 2026. **Non-Compliance Notification C20:** Sighted self-reported non-compliance notification from IRPL to DPHI against condition C20, dated 2 April 2026. During site inspections by DPHI and CPHR on 18/02/2026 and 19/03/2026, deficiencies were observed in the management of clearing limits and woody debris reuse. Clearing limits at Isobel Creek were not	weekend, which contributed to the delay. The notifications itself addressed all required content as specified in Condition A36 (identification of the CSSI, application number, condition contravened, nature of and reason for the non-compliance, and actions taken to address it). It is recommended that IRPL review its internal notification process to ensure future notifications are submitted within the seven-day timeframe regardless of weekends or public holidays.	

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				delineated with flagging, while selective flagging was observed at Burley Griffin Way. Mulching of woody materials had commenced without confirmation that alternative reuse options had been fully assessed or communicated, resulting in DPHI and CPHR concerns regarding compliance. At the time, opportunities for reuse had not been clearly communicated to the contractor prior to mulching activities as per section 8.7 of BMP. Flagging was not installed at all locations, and where flagging was installed, it was not consistent with the requirements as per section 8.3 of BMP. Therefore, a non-compliance against condition C20 was identified. IRPL became aware of non-compliance on 25 March 2026. Immediate actions undertaken included reviewing and reinstating vegetation flagging and fencing across the Project area, updating the Biodiversity Management Plan, and confirming suitable locations for reuse of timber and hollows within the BSA. Sighted submission of the non-compliance notification to DPHI as per post approval		

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				receipt SSI-9406-PA-83, dated 2 April 2026. **Non-Compliance Notification E44:** Sighted self-reported non-compliance notification from IRPL to DPHI against condition E44, dated 7 April 2026. The submission of Fauna Connectivity Strategy was extended to 9 December 2025 (PA-47) and further extended to 28 February 2026 (PA-64). A third extension request submitted on the 26 February 2026, which was refused on 02 April 2026. Therefore, a non-compliance against condition E44 was identified. IRPL became aware of non-compliance on 2 April 2026. Immediate actions undertaken included issuing an amended A9 Extension with justification, progress to date, and future milestones, and developing a program and timeline for ongoing FCS actions to accompany the amended submission. Sighted submission of the non-compliance notification as per post approval receipt SSI-9406-PA-86, dated 7 April 2026.		

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				Non-Compliance Notification C21 & C26: Sighted self-reported non-compliance against MCoA C21 and C26, as detailed in the Inland Rail Non-Compliance Notification letter dated 10 April 2026. The non-compliance relates to the use of an ARTC access/egress point at the Olympic Highway (south of Billabong Creek), which was utilised from January 2026 under a Road Occupation License (ROL) to support construction works but was not included in the approved CTTAMP. The omission was identified following discussions with DPHI during the 25 March 2026 follow-up meeting and the 31 March 2026 Post Approvals meeting and subsequently confirmed in consultation with the ER on 2 April 2026. Regardless of the existence of the ROL, the CTTAMP had not been updated to reflect the access point, resulting in a non-compliance with MCoA C21 and C26, which requires approved and implemented sub-plans to include all construction traffic arrangements. IRPL became aware of the non-compliance on 2 April 2026.		

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				Immediate actions undertaken included updating the CTTAMP to incorporate the Olympic Highway access point and initiating consultation with relevant stakeholders, including the ER and TfNSW. Sighted submission of the non-compliance notification as per post approval receipt SSI-9406-PA-88, dated 10 April 2026 The previous audit non-compliances were submitted along with the previous audit report. Sighted submission letter of IEA no. 1 and Response, dated 9 February 2026. Sighted letter from DPHI ref. SSI-9406-PA-70, dated 28 January 2026, confirming the extension of audit report by 9 February 2026. Sighted report submission via Aconex ref. IR2200-RECCO-000096, dated 9 February 2026. Sighted post approval receipt SSI-9406-PA-76, dated 9 February 2026. The previous audit non-compliance submission exceeded the required 7-day timeframe. The IRPL project team consulted with DPHI on 23 April 2026 regarding the non-compliance notification		

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				to avoid duplication. Following the meeting, IRPL confirmed during the audit interview that as per DPHI instructions, non-compliances identified and discussed at the closing meeting, must be initially reported to DPHI, with detailed information to be subsequently submitted along with the audit report.		
1.37	A	A37	A non-compliance which has been notified as an incident does not need to be notified as a non-compliance.	Based on the evidence presented, non-compliances have not been notified as an incident.		Not Triggered
PART B - COMMUNITY INFORMATION AND REPORTING						
COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT						
2.1	B	B1	A **Community Communication Strategy** must be prepared to facilitate communication about construction and operation of the CSSI with: (a) the community (including, adjoining affected landowners and businesses, Registered Aboriginal Parties (RAPs), relevant LALCs, traditional owners and others directly impacted by the CSSI); and (b) the relevant state agencies and councils. ***Note****: Nothing in this condition prevents the Proponent from submitting an amended Community Communication*	Community Communication Strategy (CCS) – I2S Rev. 3, dated 8 October 2025 as presented as evidence, provides comprehensive framework to facilitate communication about construction and operation of the CSSI with both the community and relevant authorities. The strategy identifies and engages stakeholders including directly affected landowners, businesses, Registered Aboriginal Parties (RAPs), Local Aboriginal		Compliant

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			Strategy if it meets the requirements of these conditions of approval.	Land Councils (LALCs), Traditional Owners, and the wider community (Section 5.2, Table 6). In addition, the strategy defines procedures and mechanisms for consultation with relevant state agencies and local councils, including structured consultation processes for approval documents and monitoring programs (Section 7.2, Table 9).		
2.2	B	B2	The **Community Communication Strategy** must: (a) identify people, organisations, councils and state agencies to be consulted during the design and work phases of the CSSI; (b) identify details of the community and its demographics; (c) set out procedures and mechanisms for the regular distribution of accessible information including to CALD and vulnerable communities about or relevant to the CSSI. The information to be distributed must include details regarding current site construction activities, schedules and milestones at each construction site; (d) identify opportunities for education within the community and make provision for the community to visit construction sites (taking into consideration workplace, health and safety requirements); (e) detail the for advising the community in advance of upcoming construction including upcoming out-of-hours work as required by **Condition E5** and blasting activities;	The CCS satisfies this condition by addressing these items in the following sections of the plan: As per section 5.2 ‘Key stakeholders to be consulted during design and construction’ (a) As per section 5 ‘Stakeholders and Community’ (b) As per section 6 ‘Accessibility mechanisms and procedures’ (c) As per section 7 ‘Communication tools and engagement methods’ (d) As per section 7 ‘Communication tools and engagement methods’ (e) As per section 7 ‘Communication tools and engagement methods’ (f) As per section 7 ‘Communication tools and engagement methods’ (g) As per section 5.2 2 ‘Key stakeholders to be consulted during design and construction’		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(f) identify the mechanisms for engaging with the community to determine periods of respite, as required by Condition E2; (g) 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); (h) set out the procedures and mechanisms for consulting with relevant councils and state agencies required by Condition A10; (i) describe the method for broadcasting the 24-hour toll-free telephone complaints number and postal and email addresses for enquiries, as required by Condition B7; (i) set out procedures and mechanisms: (ii) through which the community can discuss or provide feedback to the Proponent; (iii) through which the Proponent will respond to enquiries or feedback from the community; (iv) to resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of the CSSI, including timing for mediation to be undertaken once it has been escalated to the dispute resolution process; (v) address who will engage with the relevant stakeholders; and (vi) to resolve any issues and mediate any disputes that may arise in relation to property and infrastructure impacts, including but not limited to **Individual Property Management Plans** required by **Condition** E95. The Proponent must continue the operation of the existing Community Consultative Committee as part of its	and section 7'Communication tools and engagement methods' (h) As per section 7 'Communication tools and engagement methods' (i) As per section 8 'Feedback channels and complaints management' Section 7 "Communication tools and engagement methods" of CCS states that "*The CCC will be used as a communication method throughout the delivery of the I2S project. The I2S CCC will be operated in accordance with the Department's CCC Guideline".* Community Consultative Committee (CCC) is being held quarterly. CCC meeting minutes sighted for the 5 February 2026.		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Communication Strategy. The Community Consultative Committee must continue to be operated in accordance with the Department's *Community Consultative Committee Guideline*. Continuing the Community Consultative Committee must not be the only form of community consultation in the Communication Strategy.			
2.3	B	B3	The **Community Communication Strategy** must be submitted to the Planning Secretary for approval no later than one (1) month before the commencement of any Work.	Prior to commencement condition was reviewed as compliant during the initial audit. This condition is no longer triggered.		Not Triggered
2.4	B	B4	Work for the purposes of the CSSI must not commence until the **Community Communication Strategy** has been approved by the Planning Secretary. The Planning Secretary's approval of the Community Communication Strategy must be sought no later than one month before the commencement of Work.	Prior to commencement condition was reviewed as compliant during the initial audit. This condition is no longer triggered.		Not Triggered
2.5	B	B5	The **Community Communication Strategy**, as approved by the Planning Secretary, must be implemented for the duration of the work and for 12 months following the completion of construction.	The Community Communication Strategy Revision 3 (08/10/24) is the current approved version as evidenced during the initial audit. Section 7 "Communication tools and engagement methods" of CCS states that "*The CCC will be used as a communication method throughout the delivery of the I2S project. The I2S CCC will be operated in accordance with the Department's CCC Guideline".*		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Community Consultative Committee (CCC) is being held quarterly. CCC meeting minutes sighted for the 5 February 2026. Sighted a private property consultation form dated 29 July 2025, confirming consultation with the Old Sydney Road landowner. The consultation addressed flood model design changes, the farm dam register, native vegetation, condition surveys, as well as construction and operational noise and vibration. This is consistent with the CCS requirements for engaging directly impacted landowners through consultation and issue-specific communication. Also sighted private property consultation form dated 26 November 2025, confirming consultation with an Ironbong Rd owner. Sighted Social Impact Management Plan Quarterly Progress Report Q4 2025, document no. 6-0019-220-ESP-00-RP-0001, revision 0, dated 29 January 2026. The quarterly report includes the details of SIMP targets, community engagement activities and complaints management.		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Following engagement undertaken in this Q4 2025: • During October 2025, there were a total of 230 interactions between John Holland Group and the community. Recorded in Consultation Manager for the reporting period is an additional 42 interactions between IRPL and various stakeholders. • During November 2025, there were a total of 230 interactions between John Holland Group and the community. Recorded in Consultation Manager for the reporting period is an additional 8 interactions between IRPL and various stakeholders. • During December 2025, there were a total of 186 interactions between John Holland, Inland Rail and the community. Recorded in Consultation Manager for the reporting period is an additional 8 interactions between IRPL and various stakeholders.		
COMPLAINTS MANAGEMENT SYSTEM						

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
2.6	B	B6	A **Complaints Management System** must be prepared and implemented before the commencement of any work and maintained for the duration of construction and for a minimum for 12 months following completion of construction of the CSSI.	The Community Communication Strategy (CCS) includes a Complaints Management System under section 8 'Feedback Channels and Complaints Management'. The CEMP also outlined the Complaints Management System under section 7.6.3.2 'Complaints Management System'. Implementation was reviewed as per Conditions B7 and B8.		Compliant
2.7	B	B7	The **Complaints Management System** must make the following information publicly available to facilitate community enquiries and manage complaints, from one (1) month before the commencement of Work and for 12 months following the completion of construction of the CSSI: (a) a 24- hour telephone number for the registration of complaints and enquiries about the CSSI; (b) a postal address to which written complaints and enquiries 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.	The CCS satisfies this condition by addressing these items in the following sections of the plan: (a) Community information line, toll free: 1800 732 761 (24 hours, 7 days a week) (b) Postal address and Reply-Paid facility: Inland Rail Engagement Team GPO Box 14 Sydney NSW 2000 Reply Paid 89629 SYDNEY NSW 2001 (c) Email address: inlandrailnsw@inlandrail.com.au (d) Mediation process included under section 8.7 The Community Communication Strategy is available on Project's website as sighted.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
2.8	B	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. The **Complaints Register** must record the: (a) number of complaints received; (b) the date and time of the complaint; (c) the method by which the complaint was made; (d) the nature and location of the complaint, including issues raised; (e) number of people affected in relation to a complaint; (f) means by which the complaint was addressed and whether resolution was reached, with or without mediation; and (g) if no action was taken, the reason(s) why no action was taken.	Complaints Register Rev. 65 (5-0019-220-PCS-00-RG-0001_65) was presented as evidence and was verified to include the following: (a) A total of 12 Complaints received to date up to 10/04/2026. (3 complaints for the audit period). (b) Date and time of complaints are listed e.g. Work Behaviour complaint received at 13:10 on 2 March 2026. (c) Methods of complaints included e.g. email, phone call, in-person and meeting. (d) Nature of the complaints included e.g. Driver Behaviour, damage to stakeholder's vehicle etc. Location also included e.g. Stockinbingal, Cootamundra etc. (e) The details of the complaint and how it was addressed is included e.g. Worker Behaviour on Dirnaseer Rd complaint received at 13:10 on 02/03/2026 was followed up by phone call for welfare check at 3:15pm and spoke face to face at 5:30pm - complaint ref. 8647. All complaints were addressed and closed out within the timeframe of 5 days. (f) Actions were taken for all the complaints.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Sighted Consultation Manager (CM) records for Complaint 8642. The complaint was received via phone call on 27 February 2026 regarding construction machinery not following the designated access path to the worksite. The project team investigated and found that there was a miscommunication between the subcontractor lead and the dozer driver due to recent access changes. The machinery was moved out of the paddock. The complainant was informed of the actions undertaken on 2 March 2026. The complainant did not request any rectification and asked that JHG learn from this incident. The complaint was closed on 2 March 2026.		
2.9	B	B9	Personal details of any complainant are not to be provided to the ER unless otherwise agreed to or requested by the complainant.	Sighted email trail from 17 April 2025 to 13 April 2026, confirming the weekly submission of Complaints Register to the ER. Personal details are not included in the Complaints Register as sighted.		Compliant
2.10	B	B10	Complainants must be advised of the following information before, or as soon as practicable after, providing personal information: (a) the Complaints Register may be forwarded to government agencies, including the Department (Department of Planning, Housing and Infrastructure, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150), to allow them to undertake their regulatory duties;	The Collection Statement is available on the Inland Rail website as sighted and includes key provisions addressing the management of personal information associated with enquiries and complaints. Specifically, the statement confirms that information recorded in the Complaints Register may be shared with relevant state		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(b) by providing personal information, the complainant authorises the Proponent to provide that information to government agencies; (c) the supply of personal information by the complainant is voluntary; and (d) the complainant has the right to contact government agencies to access personal information held about them and to correct or amend that information (Collection Statement). The Collection Statement must be included on the Proponent or development website to make prospective complainants aware of their rights under the Privacy and Personal Information Protection Act 1998 (NSW). For any complaints made in person, the complainant must be made aware of the Collection Statement.	agencies, including the Department, to enable regulatory functions; that by providing personal information, the complainant authorises its disclosure to these agencies; that provision of personal information is voluntary; and that complainants have the right to access, correct or amend their personal information through the relevant agencies. In addition, a copy of the Inland Rail Illabo to Stockinbingal Enquiries and Complaints Management information leaflet was sighted, which outlines how complaints are received, recorded, managed and escalated.		
2.11	B	B11	The Complaints Register must be provided to the Planning Secretary upon request, within the timeframe stated in the request.	IRPL and JHG confirmed during the audit interview that there have been no requests from DPHI for the Complaints Register to be provided.		Not Triggered
2.12	B	B12	**Community Complaints Mediator** A Community Complaints Mediator that is: (a) independent of the design and construction personnel; and	A Community Complaints Mediator has been appointed as evidenced during the initial audit: DPHI approval letter ref. SSI-9406-PA-4, dated 1 October 2024, confirming the Community Complaints Mediator personnel.		Compliant

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			(b) accredited under the National Mediator Accreditation System, administered by the Mediator Standards Board must be nominated by the Proponent, approved by the Planning Secretary and engaged while the Complaints Management System required by Condition B6 is in operation. The nomination of the Community Complaints Mediator must be submitted to the Planning Secretary for approval within one month before the commencement of Work.			
2.13	B	B13	The Proponent may nominate additional suitably qualified and experienced persons, for the Planning Secretary's approval, to assist the Community Complaints Mediator. If additional persons are nominated, the Proponent must describe how the Community Complaints Mediator's activities will achieve consistent outcomes.	The role of community complaints mediator is included in CCS under section 4 'Structure and Accountabilities' and mediation process details are included under section 8.7 'Mediation Process'. IRPL and JHG advised during the audit interview that no mediation has been required for any of the complaints to date.		Not Triggered
2.14	B	B14	The role of the Community Complaints Mediator is to address any complaint where a member of the public has lodged a complaint and is not satisfied by the Proponent's response. Any member of the public that has lodged a complaint which is registered in the Complaints Management System identified in Condition B6, and that complaint is unresolved, may ask the Community Complaints Mediator to	IRPL and JHG advised during the audit interview that no mediation required for any of the complaints to date.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			review the Proponent's response. The application must be submitted in writing and the Community Complaints Mediator must respond within 28 days of the request being made or other specified timeframe agreed between the Community Complaints Mediator and the member of the public.			
2.15	B	B15	The Community Complaints Mediator will: (a) review any unresolved disputes if the procedures and mechanisms under Condition B2(j) do not satisfactorily address complaints; (b) make recommendations to the Proponent to satisfactorily address complaints, resolve disputes or mitigate against the occurrence of future complaints or disputes; and (c) provide a copy of the recommendations, and the Proponent's response to the recommendations, to the Planning Secretary within one month of the recommendations being made.	IRPL and JHG advised during the audit interview that no mediation required for any of the complaints to date.		Not Triggered
2.16	B	B16	The Proponent must implement the recommendations made by the Community Complaints Mediator in accordance with Condition B15 within a timeframe agreed with the Community Complaints Mediator, unless otherwise agreed with the Planning Secretary.	IRPL and JHG advised during the audit interview that no mediation required for any of the complaints to date.		Not Triggered
2.17	B	B17	The Community Complaints Mediator will not act before the Complaints Management System required by Condition B6 has been executed for a complaint and will not consider issues such as property acquisition, where other dispute	IRPL and JHG advised during the audit interview that no mediation required for any of the complaints to date.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			processes are provided for in this approval or clear government policy and resolution processes are available, or matters which are not within the scope of this CSSI.			
PROVISION OF ELECTRONIC INFORMATION						
2.18	B	B18	A website or webpage providing information in relation to the CSSI must be established before commencement of work and be maintained for the duration of construction, and for a minimum of 24 months following the completion of construction. The following up-to-date information (excluding confidential, private, commercial information or any other information that the Planning Secretary has approved to be excluded) must be published before the relevant work commences and maintained on the website or dedicated pages including: (a) information on the current implementation status of the CSSI; (b) a copy of the documents listed in **Condition A1**, 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;	Project website: Inland Rail in NSW: Illabo to Stockinbingal Section - Inland Rail Information is included under tab 'status' All the required documents are included under tab 'Resources' and then tab 'Approval & Compliance'. (a) Implementation status under tab 'Progress' (b) Project documentation includes the EIS, Amendment Report, Submissions Report + Amendments under tab 'Approval & Compliance' (c) SSI consent under tab 'Approval & Compliance" (d) An EPL 22021 has been issued to JHG and is included on the website under tab 'Approval & Compliance'	**Opportunity for Improvement** **I2S-02_OFI-01:** The project website did not contain up to date documentation e.g., Temporary Accommodation Facility Management Plan – unsigned copy uploaded; unsigned copy of Minor Ancillary Facility for Ironbong Road CH9380. In addition, the SIMP Quarterly Report (Q4 2025) was not uploaded within the required timeframe. This matter has been addressed as a non-	Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(e) a current copy of each document required under the terms of this approval must be published before the commencement of any work to which they relate or before their implementation, as the case may be; and (f) a copy of the compliance and audit reports required under this approval. 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. Where the information / document relates to a particular work or is required to be implemented, it must be published before the commencement of the relevant work to which they / it relates or before its implementation. All information required in this condition is to be provided on the Proponent's website, ordered in a logical sequence and be easy to navigate. ***Notes:*** *1. The intention of this condition is to increase transparency and for information/documents required as part of the approval to be provided proactively and publicly in an easily accessible manner. Where information is excepted by this condition, it is intended that these documents are provided in their redacted form.* *2. The Planning Secretary may instruct the Proponent to finalise and upload any report or documents to the Project's website in accordance with Condition A4.*	(e) Post approval documents including CEMP and Sub-Plan under tab 'Approval & Compliance' (f) Independent audit report no. 1 included under tab 'Approval & Compliance'	compliance under Condition E110 (refer to I2S-02_NC-06). It is recommended that the project website is to be updated and continually maintained with current information and documentation.	

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			3. The publishing of documents should occur a minimum of a week before the relevant Work / activity is going to commence. *4. In determining what information should be published under this condition, the proponent should have regard to the principles in Division 2 of Part 2 of the Government Information (Public Access) Act, 2009.* *5. Documents should be named to be consistent with the conditions of approval where possible. The name should also give an overall impression of what the document is about. The names should be simple and concise (no more than 50 characters) without any unnecessary punctuation or under scoring in the title.*			
2.19	B	B19	Where the agreement of the Planning Secretary is sought to cease providing information via a website or webpage in accordance with **Condition B18**, the Proponent must demonstrate: (a) operational compliance through independent audits completed in accordance with **Condition A29**; (b) how any ongoing monitoring programs required by this approval will be made publicly available; and (c) how the public can request access to information that will no longer be available through a website or webpage.	IRPL and JHG confirmed during the audit interview that no agreement from DPHI has been sought to cease providing information via website.		Not Triggered
PART C - CONSTRUCTION ENVIRONMENTAL MANAGEMENT						

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
CONSTRUCTION ENVIRONMENTAL MANAGEMENT FRAMEWORK						
3.1	C	C1	A Construction Environmental Management Framework (CEMF) may be prepared to facilitate the preparation and approval of construction environmental management and monitoring plans required under Part C of this approval. The CEMF must: (a) identify the CEMPs, CEMP sub plans and/or CMPs required for each stage of construction consistent with the Staging Report prepared under Condition A11; (b) document the proposed structure of the CEMPs, CEMP Sub-plans and CMPs for the relevant stage of construction; (c) provide, by way of a Risk Matrix, an assessment of the predicted level of environmental and social risk, including the potential level of community concerns posed by component aspects of each construction stage. This must use a process consistent with *AS/NZS ISO 31000: 2018; Risk Management – Guidelines;* and (d) nominate the consultation and endorsement level for each CEMP, CEMP Sub-plan and CMP required for each construction stage. The endorsement level being one of the following: (i) Low Risk Stage – self endorsed and consultation with state agency and council stakeholders is not mandatory;	As evidenced during the initial audit, elements of the CEMF are included in the Staging Report and are as agreed with DPHI. Sighted I2S Monthly Environmental Meeting, dated 8 August 2025, confirming that CEMF is not required. This condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(ii) Medium Risk Stage – endorsed by the ER and consultation with state agency and council stakeholders required; and (iii) High Risk Stage– endorsed by the Planning Secretary and consultation with state agency and council stakeholders required. (e) For a Low Risk Stage(s) the requirements of Part C of this approval do not apply. In these circumstances, a CEMP, CEMP sub-pan and CMP, may be substituted with an alternate process such as a Construction Work Method Statement (CWMS) or equivalent. (f) The CEMF must be endorsed by the ER and then submitted no later than one month before the lodgment of any CEMP, CEMP sub plan or CMP to the Planning Secretary for approval. *Notes:* *1. The Planning Secretary may vary the CEMF in relation to the endorsement authority for the CEMPs, CEMP Sub-plans and CMPs.* *2. The intent is for staging and not activities within a stage.*			
3.2	C	C2	The approved CEMF must be implemented for the duration of construction.	As evidenced during the initial audit, elements of the CEMF are included in the Staging Report and are as agreed with DPHI. Sighted I2S Monthly Environmental Meeting, dated 8 August 2025, confirming that CEMF is not required. This condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
3.3	C	C3	Where changes are proposed to the staging of construction and these affect an approved CEMF, a revised CEMF must be prepared, endorsed by the ER and submitted to the Planning Secretary for approval no later than one month prior to the proposed change in the staging.	As evidenced during the initial audit, elements of the CEMF are included in the Staging Report and are as agreed with DPHI. Sighted I2S Monthly Environmental Meeting, dated 8 August 2025, confirming that CEMF is not required. This condition is no longer triggered.		Not Triggered
SITE ESTABLISHMENT WORK						
3.4	C	C4	**Ancillary Facilities** 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 adjacent to the construction boundary; and (b) they are not located next to a sensitive land use(s) (including where an access road is between the facility and the receiver), unless the 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, social and economic impacts.	Temporary Camp Facility established under the Site Establishment Plan as verified during the initial audit. IRPL and JHG confirmed during the audit interview that no Ancillary Facilities have been established outside of Condition A1 or the CEMP.		Not Triggered

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3.5	C	C5	**Site Establishment Management Plan** Before the establishment of any ancillary facility (excluding minor ancillary facilities established under Condition C9) or temporary workforce accommodation facility, the Proponent must prepare a Site Establishment Management Plan which outlines the environmental management practices and procedures to be implemented for the establishment of the ancillary facilities or temporary workforce accommodation facility. The Site Establishment Management Plan must be prepared in consultation with the relevant council and state agencies and endorsed by the Environmental Representative. The Plan must be submitted to the Planning Secretary for approval one (1) month before the establishment of any ancillary facilities or temporary workforce accommodation facility. The Site Establishment Management Plan must detail the management of the ancillary facilities or temporary workforce accommodation facility, and include: (a) a description of activities to be undertaken during establishment of the ancillary facility or temporary workforce accommodation facility (including indicative scheduling and duration of work to be undertaken at the site); (b) figures illustrating the proposed operational site layout/s; (c) details of planned communication with the community consistent with the requirements of Condition B2;	The Site Establishment Management Plan (SEMP) was reviewed as compliant during the initial audit. The SEMP has been discontinued as the camp is now operational. The Temporary Workforce Accommodation Facility Management Plan is currently in effect for camp's operational phase. This condition is no longer triggered.		Not Triggered

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			(d) 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 work; (e) 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 (f) a program for monitoring the performance outcomes consistent with the requirements of Conditions C17 and C27. Nothing in this condition prevents the Proponent from preparing individual Site Establishment Management Plans for each ancillary facility, or one Site Establishment Management Plan for all ancillary facilities and the temporary workforce accommodation facility. 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 C12 will apply to the operation of ancillary facilities and the Temporary Workforce Accommodation Facility Management Plan required by			

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			Condition A18 will apply to the operation of accommodation facilities.			
3.6	C	C6	**Operation of Ancillary Facilities** The use of an ancillary facility for construction must not commence until the CEMP required by Condition C12, relevant CEMP Sub-plans required by Condition C17 and relevant Construction Monitoring Programs required by Condition C27 have been approved by the Planning Secretary. This condition does not apply to the use of minor Ancillary Facilities established under Condition C9. *Note: The operation of an ancillary facility can commence if the ER has determined the operational activities are Low Impact work as defined in Table 1 of this approval.*	The Temporary Camp Facility established under the Site Establishment Management Plan, was not categorised as an Ancillary Facility during the initial audit. This condition is therefore not triggered.		Not Triggered
3.7	C	C7	**Access to Ancillary Facilities** Where possible, ancillary facilities must be accessed via existing public roads and/or the existing rail corridor. 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	Access required from private access during early low impact works were managed under land access agreements: Sighted Land Access Agreement for 72 Warrens Lane from 2 September 2024 to 2 September 2026. The land access was required for surveys, studies and design site investigations. The agreement was signed off by landowner on 6 September 2024.		Not triggered

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			construction access tracks on private property must comply with the requirements of Condition C4.	6A, 6B, 7A & Temporary Accommodation Camp accessed via public roads. JHG confirmed during the audit interview that there were no changes in this audit period.		
3.8	C	C8	The Proponent must ensure that all roads / tracks that will be used to access ancillary facilities are to the standard necessary to provide access as agreed with landowners, asset owner(s) and/or the relevant roads authority (as applicable), including a trafficable surface suitable to accommodate the type of vehicle movements that are anticipated to be associated with the construction of the CSSI.	Landowners agreement as per above Condition C7. Works done under a Works Authorisation Deed (WAD) on ARTC & Linkx Bulk Haulage land. Sighted Section 138 approval from Junee Council for Warrens Lane, dated 14 April 2026. Currently seeking agreement with TfNSW for Burley Griffin Way and Hibernia Street under WADs. Unable to utilise Gate 1 – CTTAMP still to be finalised – endorsement required from TfNSW.		Compliant
3.9	C	C9	**Minor Ancillary Facilities** Minor ancillary facilities including lunch sheds, office sheds, portable toilet facilities, material lay down sites, stockpile areas, areas used to assemble infrastructure and the like can be established and used where they satisfy the following	The following minor ancillary facilities assessed by the ER are available on the project website: • Minor Ancillary Facility – Warrens Lane document no. 5-0019-220-		Compliant

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			criteria: (a) are located within the construction boundary; and (b) have been assessed by the ER to have - (i) minimal 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) minimal 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.	EEC-00-RP-0012, Rev. 0, dated 27 August 2025. - Minor Ancillary Facility – Grogan Rd document no. 5-0019-220-EEC-00-RP-0012, Rev. 0, dated 30 May 2025. - Minor Ancillary Facility - Corner of Old Cootamundra Road and Dudauman Road document no. 5-0019-220-EEC-00-RP-0001, Rev. 0, dated 2 June 2025 - Minor Ancillary Facility – CH9380 Ironbong Rd document no. 5-0019-220-EEC-00-RP-0016, Rev. 0, dated 29 September 2025. - Minor Ancillary Facility – CH11950 (Ironbong Road) document no. 5-0019-220-EEC-00-RP-0003 Rev. 0, dated 10 November 2025. - Minor Ancillary Facility – CH37500 Harold Park House (Burley Griffin Way) document no. 5-0019-220-EEC-00-RP-0004, dated 10 November 2025. Sighted map for Burley Griffin Way, Construction Compound 27, Stockpile Laydown. Existing farm building. Map also includes Construction Compound 26, Stockpile Laydown. Part of CEMP and as per EIS. - Minor Ancillary Facility – CH18500 (Dirnaseer Road) document no. 5-0019-220-EEC-00-RP-0013, dated 6 August 2025		

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				IRPL advised during the audit interview that two MAFs are still in process.		
3.10	C	C10	**Boundary screening** Boundary screening must be erected at any ancillary facilities (excluding minor ancillary facilities) that is adjacent to sensitive land use(s) for the duration of the time that the ancillary facility is in use, unless otherwise agreed with the owner and occupier of the adjacent sensitive land use(s). Boundary screening must minimise visual impacts on adjacent sensitive land use(s) and not create a fire hazard.	IRPL noted during the audit interview that McKenzie's is the only sensitive land adjacent to the works; however, the entire lot is now ARTC land. ARTC also owns the main corridor from Dirnaseer Road. Vegetation screening existing at main compound as reviewed during site inspection.		Compliant
3.11	C	C11	**Decommissioning of Ancillary Facilities** 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.	IRPL and JHG confirmed during the audit interview that this condition applies only at possession phase, with no decommissioning having occurred.		Not Triggered
CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN						
3.12	C	C12	Except as provided by **Condition C1,** A Construction Environmental Management Plan (CEMP) must be prepared in accordance with the Environmental Management Plan Guideline for Infrastructure Projects (DPIE, 2020) to detail how the performance outcomes, commitments and mitigation measures specified in the	Construction Environmental Management Plan (CEMP) document no. 5-0019-220-PMA-00-PL-0037, Rev. 2, dated 10 September 2025, was presented as evidence. Noted to be upcoming for its 6-monthly review.		Compliant

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			documents listed in Condition A1 will be implemented and achieved during all stages of construction.			
3.13	C	C13	The CEMP must provide: (a) a description of activities to be undertaken during construction (including the scheduling of construction); (b) details of environmental policies, guidelines and principles to be followed in the construction of the CSSI; (c) a program for ongoing analysis of the key environmental impact 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 CSSI. The initial risk assessment may be undertaken as part of the CEMF pursuant to Condition C1; (d) details of how the activities described in subsection (a) 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 (c) of this condition; (e) an inspection program detailing the activities to be inspected and frequency of inspections;	The CEMP satisfies this condition by addressing these items in the following sections of the plan: (a) as per section 3.1 'Project Scope' and section 4 'Project Description' (b) as per section 6.4.3 'Guidelines and Standards' and section 6.1 'EIS Environmental Risk Assessment' (c) as per section 6.1 'EIS Environmental Risk Assessment', section 6.2 'Project Risk Assessment Process', section 9.7 'Review and Improvement' and appendix A3 'Risk Assessment Matrix' (d) as per section 6.6 'Environmental Performance Outcome', appendix A2 'Environmental Impacts and Aspects' and appendix A3 'Risk Assessment Matrix' (e) as per section 9.1 'Environmental Inspections' (f) as per section 8 'Incidents and Emergencies', section 9.3 'Environmental Non-Compliances and Non-Conformances' and appendix A6 'Environment Incident Procedure'		Compliant

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			(f) a protocol for managing and reporting, including to the relevant roads authority where relevant to traffic, transport and access management, any: (i) incidents; and (ii) non-compliances with this approval or statutory requirements; (g) procedures for rectifying any non-compliance with this approval identified during compliance auditing, incident management or at any time during construction; (h) a list of all the CEMP Sub-plans required in respect of construction, as set out in Condition C17. Where staged construction of the CSSI is proposed, the CEMP must also identify which CEMP Sub-plan applies to each of the proposed stages of construction; (i) a description of the roles and environmental responsibilities for relevant employees and any relevant independent appointment; (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; (k) for periodic review and update of the CEMP and all associated plans and programs; and	(g) as per section 9.3 'Environmental Non-Compliances and Non-Conformances' (h) as per section 5.2 'Construction Environmental Management Plan' (i) as per section 7.1 'Resources, Responsibilities and Authority' (j) as per section 7.4 'Competence, training and Awareness' (k) as per section 9.5 'Reporting and Identified Records' and section 9.7 'Review and Improvement' (l) as per section 4.2.2 'Site Establishment and Enabling Works'		

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			(l) relevant details from the Site Establishment Management Plan(s).			
3.14	C	C14	CEMP(s) (and relevant CEMP sub-plans) must be submitted to the Planning Secretary for approval except those permitted to be endorsed by others pursuant to a CEMF approved by the Planning Secretary under Condition C1.	CEMP and Sub-Plans are currently in review for 6-monthly review requirement. JHG advised during the audit period that changes to the plans are minor and will require only ER endorsement. CTTAMP and BMP will be submitted to DPHI for approval to address non-compliances raised during the audit period. This condition was not triggered during this audit.		Not Triggered
3.15	C	C15	Where a CEMP (and relevant CEMP sub-plans) requires the Planning Secretary's approval, the CEMP (and relevant CEMP sub-plans) must be endorsed by the ER and then submitted to the Planning 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 each stage.	CEMP and Sub-Plans are currently in review for 6-monthly review requirement. CTTAMP and BMP will be submitted to DPHI for approval to address non-compliances raised during the audit period. The CEMP and Sub-Plans will require submission to the ER for endorsement. This condition was not triggered during this audit.		Not Triggered
3.16	C	C16	CEMP(s) (and relevant CEMP sub-plans) not requiring the Planning Secretary's approval, but requiring ER endorsement, must be submitted to the ER no later	CEMP and Sub-Plans are currently in review for 6-monthly review requirement.		Not Triggered

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			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. The CEMPs (and relevant CEMP sub-plans) must be endorsed by the ER as being consistent with the conditions of this approval and all undertakings made in the documents listed in Condition A1.	The CEMP and Sub-Plans will require submission to the ER for endorsement. This condition was not triggered during this audit.		
3.17	C	C17	Except as provided by Condition C1, the following CEMP Sub-plans must be prepared in consultation with the relevant state agencies, relevant councils and RAPs identified for each CEMP Sub-plan. Evidence of consultation must be provided consistent with Condition A10.	The CEMP and Sub-Plans were prepared in consultation with relevant stakeholders as reviewed during the initial audit. JHG and IRPL confirmed during the audit interview that no further consultation undertaken in this audit period.		Not Triggered

	Required CEMP Sub-plan	Relevant 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	BCS
(d)	Soil and Water	Relevant Councils and BCS

<table>
<tr><th>ID No.</th><th>CSSI Part</th><th>Req. No.</th><th>SSI-9406 Requirement</th><th>Audit Evidence</th><th>Audit Findings / Recommendations</th><th>Compliance Rating</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td>(e)</td><td>Heritage</td><td>Heritage NSW, RAPs, and relevant councils</td></tr>
<tr><td>(f)</td><td>Flood Emergency Management</td><td>SES, BCS and relevant councils</td></tr>
<tr><td>(g)</td><td>Biosecurity</td><td>BCS, DPI Agriculture, Local Land Services</td></tr>
</table>
<i>Notes</i>:
1. <i>CEMP Sub-plan(s) may reflect the staged construction of the project through geographical activities, temporal activities or activity-based contracting and staging.</i>
2. <i>Nothing in this condition prevents the Proponent from combining any of the above CEMP Sub- plans.</i>
3. <i>The Biodiversity CEMP Sub-Plan must be consistent with goals and objectives, mitigation measures and monitoring requirements of the Commonwealth approved conservation advice and any Recovery Plans for all Matters of National Environmental Significance.</i>
</td><td></td><td></td><td></td></tr>
<tr><td>3.18</td><td>C</td><td>C18</td><td>The CEMP Sub-plans listed in Condition C17 must state how:
(a) the environmental performance outcomes identified in the documents listed in Condition A1, as modified by these conditions, will be achieved;</td><td>Compliance with Condition C18 was verified as follows:
(a) as per section 2.4 of CTTAMP; section 4.2.1 of BMP
(b) as per table 2-2 of CTTAMP; section 8 of BMP</td><td></td><td>Compliant</td></tr>
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			(b) the mitigation measures identified in the documents listed in Condition A1, as modified by these conditions will be implemented; (c) the relevant terms of this approval will be complied with; and (d) issues requiring management during construction, as identified through ongoing environmental risk analysis, will be managed.	(c) as per section 2.6 of CTTAMP; as per section 2.1 of BMP (d) as per section 14 of CTTAMP; section 9 of BMP		
3.19	C	C19	The Construction Noise and Vibration Sub-plan must include, but not be limited to: (a) an approach to assess and manage construction fatigue from noise impacts on an ongoing basis; (b) mitigation for construction traffic noise impacts from additional construction traffic and road diversions. (c) vibration levels at a range of distances from vibration intensive equipment such as excavators and vibratory rollers before undertaking works with the specific type and size of equipment.	Noise and Vibration Management Plan document reference: 5-0019- 220-PMA-00-PL-0028, revision 0, dated 1 August 2025 was reviewed as part of this audit. Compliance with this condition demonstrated below: (a) As per section 9.4 'Construction Fatigue and Cumulative Impacts' (b) As per section 9.3 'Traffic Noise Management' (c) As per section 9.5.2 'Vibration Trials' and section 8.3 'Vibration Impacts'		Compliant
3.20	C	C20	The **Biodiversity Management Sub-plan** must be endorsed by a suitably qualified and experienced ecologist and include, but not be limited to: (a) details of the measures to avoid and minimise disturbance to native vegetation, and other habitat of threatened flora and fauna species, and consistency	Biodiversity Management Plan document reference: 5-0019-220-PMA-00-PL-0055, revision 0, dated 1 September 2025 was reviewed as part of this audit. Compliance with this condition demonstrated below:	**Non-Compliance I2S-02_NC-01:** The non-compliance was self-reported by IRPL to DPHI via a	Non-Compliant

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			with the goals and objectives, mitigation measures and monitoring requirements of the Commonwealth approved conservation advices and any Recovery Plans and Threat Abatement Plans for all Matters of National Environmental Significance; (b) procedures for undertaking pre-clearing surveys for native fauna, including surveys by a suitably qualified and experienced ecologist to determine the presence of native fauna in the area impacted by the CSSI, and procedures and measures to manage their relocation; (c) a weed, pest and pathogen management plan consistent with the Biosecurity Act 2015 and Riverina Regional Strategic Weed Management Plan 2023-2027; (d) procedures for the dewatering of farm dams and coffer dams, including the relocation of aquatic fauna; (e) procedures for working within and adjacent to waterways including relocation of fauna and measures to maintain fish passage when the waterway is in flow; (f) protocols for unexpected and incidental finds of threatened species and threatened ecological communities within the construction boundary including in accordance with **Condition E27.**	(a) as per section 8 'Environmental Mitigation and Management Measures' (b) as per Appendix B 'Clearing Procedure' and Appendix C 'Fauna Rescue and Release Procedure' (c) as per section 8.9 'Management of Weeds, Pests and Pathogens' (d) as per Appendix E 'Farm Dam Dewatering Procedure' (e) as per Appendix D 'Working within and adjacent to waterways' (f) as per Appendix I 'Unexpected and Incidental Finds Procedure' During the 19/03/2026 site inspection by DPHI and CPHR, the clearing limits at Isobel Creek were observed without flagging installed and pockets/individual trees at Burley Griffin Way were observed to be surrounded by orange flagging. During the 18/02/2026 site inspection, JHG outlined that mulching had commenced for materials not suitable for reuse to enable the mulch to be used for ERSED controls on-site. Concerns were raised by the regulator regarding the quantity of mulch and if other re-use options had been investigated prior to the mulching such as the BSA site. At the time of the 18/02/2026 site inspection by DPHI and CPHR, IRPL had not informed John Holland that reuse of	non-compliance notification dated 2 April 2026, relating to flagging installation in accordance with the Biodiversity Management Plan (BMP) and the identification of reuse opportunities for woody debris. During DPHI's site inspection on 19 March 2026, flagging was not installed at all locations, and where flagging was installed, it was not consistent with the requirements as per Section 8.3 of the Biodiversity Management Plan (BMP). Additionally, during DPHI's site inspection on 18 February 2026,	

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				wooded debris could be considered, nor that access was possible for placement of the wooded debris prior to the sign off of the BSA. It is noted initial discussions were held with DPI fisheries in March 2025. Sighted email to DPI Fisheries, dated 25 February 2025. These discussions included an agenda raised by JHG staff to discuss matters associated with CoA E41, E44 and E46. A subsequent meeting was held with Fisheries where opportunities to provide rootballs for re-use offsite as part of DPI Fisheries Projects in the Southwest Slopes and Riverina regions was discussed. Further discussions have taken place with the Department providing details of preferred installation, habitat and hydraulic considerations (Attachment 1). As-built designs include details of installation of fauna furniture, with JHG committing to incorporating remaining timber as prescribed by DPI Fisheries. The details provided are also being incorporated into the next revision of the FCS. During the audit interview, JHG and IRPL advised that the matter was only partially considered a non-compliance, specifically in relation to the reuse of vegetation within the Biodiversity Stewardship Agreement (BSA). It was noted that early access had been sought to utilise the BSA area; however, the BSA is managed by IRPL, not JHG. During a DPHI site visit, questions were raised regarding why the	opportunities for reuse of woody debris had not been clearly communicated to the contractor prior to mulching activities as per Section 8.7 of the BMP.	

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				BSA area, located outside the project boundary, had not been considered. This subsequently led to the option being pursued. The issue itself is not considered a non-compliance; however, an NC was raised in accordance with internal classification and flagging requirements. Evidence was sighted demonstrating ongoing consultation with DPI Fisheries. Initial consultation was documented in meeting minutes dated March 2025. JHG subsequently re-engaged with DPI Fisheries to confirm the suitability of cleared vegetation for reuse, including for creek bank stabilisation and rehabilitation works. An email from JHG to DPI Fisheries dated 26 March 2026 was sighted, confirming earlier enquiries regarding whether any projects required cleared vegetation. Additional consultation emails dated 26 March 2026 were also sighted. This correspondence confirms that JHG sought to ensure vegetation reuse aligned with environmental and ecological requirements, including potential use for terrestrial fauna habitat. Sighted email correspondence to CPHR, dated 11 March 2026, confirming that felled timber components will be repurposed as fauna furniture within bridges and creek crossings. Sighted email to DPI Fisheries, dated 26 March 2026, regarding consultation for the installation of fauna furniture beneath bridges and within/along creek banks.		

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				Sighted response from DPI Fisheries, dated 2 April 2026, providing guidance on the installation process for snags and associated habitat considerations. No cleared vegetation has been taken offsite. All material has been reused within the project, including for creek bank stabilisation and installation as fauna habitat (e.g. “fauna furniture”) at watercourse crossings. The BMP is currently under review by the ER and will be submitted to DPHI following this review. Evidence of toolbox talks, dated 23 April 2026, was sighted, confirming that environmental controls and installation methodologies have been communicated to the workforce. Timber hollows were observed temporarily placed outside the fence line and are scheduled to be relocated to designated locations within the BSA boundary. These measures are intended to enhance biodiversity outcomes while also contributing to erosion minimisation. In addition, a Box Gum Woodland Restoration Plan has been developed, and a BSA application for stewardship has been lodged. Supporting documentation, including information relating to the TEC, is currently under government review. Subject to approval, works will be implemented under the BSA framework. These activities are linked to Conditions E34 and E35, with implementation to be undertaken in accordance with the		

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				approved restoration plan and BSA requirements.		
3.21	C	C21	The **Construction Traffic, Transport and Access Management Sub-plan (CTTAMP)** must be consistent with any agreements with the relevant roads authority about the use and management of local roads and include measures to: (a) minimise impacts on seasonal and school related traffic, including harvest-related vehicles, public transport (including school buses, bus stops) and freight operators; (b) minimise noise and amenity impacts of heavy vehicles entering and exiting construction compounds, and ancillary sites, and driving through populated areas, including school zones at speed limited times; (c) minimise impacts to vulnerable road users and sensitive receivers; (d) schedule heavy vehicle movements to avoid movements on public roads outside the construction hours detailed in **Condition E1**; (e) provide any necessary road intersection treatments to accommodate construction traffic, (f) ensure road repair is undertaken periodically before and during construction, and as identified in **Conditions E101** and **E102**; (g) inform road users and freight operators of changes to traffic conditions; (h) maintain pedestrian and vehicular access to affected properties, including mechanisms to consult with	Construction Traffic, Transport and Access Management Plan document no. 5-0019-220-PMA-00-PL-0056 Rev. 1, dated 7 November 2025 was reviewed as part of this audit. Compliance with this condition demonstrated below: (a) as per section 5.3.2 'Variations in Traffic Flow', section 5.4 'Management of Public Transport' and section 5.8 'Management of Freight Operators' (b) as per section 6.1 'Overview' (c) as per section 5.5 'Management of Vulnerable Road Users' (d) as per section 6.1 'Overview' (e) as per section 6.4.2 'Road Intersection Treatment' and section 6.5.2 'Site Access Gate Treatment Selection Process' (f) as per section 5.1.2 'Road Maintenance and Dilapidation' (g) as per section 5.8 'Management of Freight Operators' and section 9.1 'Communications to Public' (h) as per section 5.5 'Management of Vulnerable Road Users', section 5.7 'Management of Property Access and section 5.2.5	**Non-Compliance I2S-02_NC-02:** The non-compliance was self-reported by IRPL to DPHI via a non-compliance notification dated 9 April 2026, relating to the use of access point not included in the Construction Traffic, Transport and Access Management Plan (CTTAMP). During project activities from January 2026, an ARTC access/egress point on the Olympic Highway (south of Billabong Creek) was utilised under a Road Occupation Licence (ROL) to support	Non-Compliant

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			affected landowners and implement measures prior to any access disruption; (i) Consult utility providers and managers to ensure appropriate access to utilities and assets is maintained; (j) identify construction vehicle routes not identified in the documents listed in **Condition A1**. (k) prepare a Country Rail Network / Inland Rail Interface Management Plan to address potential impacts to Country Rail Network / Inland Rail interfaces.	'Community Communication Strategy' (i) as per section 5.7 'Management of Property Access' and section 9.4 'Coordination with Utility Providers' (j) as per section 6.4.1 'Proposed Haulage and Construction Routes' and section 6.7.2 'Workforce Traffic Routes and Parking' (k) as per appendix G 'I2S Country Rail Network / Inland Rail Interface Management Plan' Revised CTTAMP Rev. 0.1 has been submitted to Junee Council and TfNSW for review: Sighted submission to Junee Council via Aconex ref. IR2200-TRANSMIT-002509, dated 13 April 2026. Sighted submission to TfNSW via Aconex ref. IR2200-TRANSMIT-002507, dated 13 April 2026. A Road Occupancy Licence (ROL) is being obtained for the access to the alignment from Olympic Highway for construction works on monthly basis. Sighted ROL 2603512 from TfNSW for Olympic Highway from Bethungra Road to	construction works. However, this access point was not included in the approved CTTAMP, as required under MCoA C21 and C26. The omission was identified following discussions with DPHI during the 25 March 2026 follow-up meeting and the 31 March 2026 Post Approvals meeting, and was subsequently confirmed in consultation with the Environmental Representative (ER) on 2 April 2026.	

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				Layton Street for the duration of 1 February 2026 to 1 March 2026. Sighted ROL 2631586 from TfNSW for Olympic Highway from Bethungra Road to Layton Street for the duration of 1 April 2026 to 1 May 2026.		
3.22	C	C22	The **Soil and Water Management Sub-plan** must include: (a) measures to avoid and minimise erosion and sedimentation impacts including to riparian, agricultural and forested land, and areas of high salinity and high erosion potential; (b) a draft water balance for the project; (c) information demonstrating that the required construction water resources are legally and physically available; (d) procedures and protocols for the appropriate supply, transport and storage of water across the CSSI; (e) mitigation measures to address construction water resource shortages that arise; (f) a protocol for avoiding, minimising and mitigating impacts in the event of interaction with groundwater; (g) a surface water monitoring framework as per **Condition C29**; (h) a dam dewatering protocol; and (i) a spill response procedure.	Soil and Water Management Plan document reference: 5-0019-220-PMA-00-PL-0058, revision 0, dated 4 August 2025 was reviewed as part of this audit. Compliance with this condition demonstrated below: (a) As per section 8.2 ‘Erosion and Sediment Control’ (b) As per section 8.6.1 ‘Draft Water Balance’ (c) As per section 8.6 ‘Water Resource Management’ (d) As per section 8.6.2 ‘Primary Water Source, Transport and Storage, and section 8.6.3 ‘Alternative Water Sources and Water Shortage Planning’ (e) As per section 8.6.3 ‘Alternative Water Sources and Water Shortage Planning’ (f) As per section 8.11 ‘Groundwater Management’		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				(g) As per Appendix B 'Surface Water Monitoring Program' (h) Dam Dewatering Procedure is provided in Appendix E of the Biodiversity Management Sub-Plan (i) As per Appendix E 'Spill Response Procedure'		
3.23	C	C23	The **Heritage Management Sub-plan** must include: (a) identification of the Aboriginal objects and Aboriginal places that must be avoided and the protective measures to be put in place; (b) procedures for additional surveys as required by **Condition E135**; (c) procedures for salvaging and safe keeping of the Aboriginal objects identified in the documents listed in **Condition A1**, and their long-term management; (d) measures to avoid or minimise disturbance to Aboriginal heritage where, (as considered by legislation, guidelines and community) areas, objects or places are found to be present. Where impacts cannot be avoided, records of stakeholder involvement and engagement; and details on the methodology for archaeological excavation and/or salvage work; (e) a process for inspecting trees for evidence of cultural scarring in areas that were not subject to the archaeological survey, and measures to avoid impact. If impact is unavoidable, and upon consultation with the Registered Aboriginal Parties, work shall be undertaken under the guidance of an appropriately qualified heritage specialist; and	Heritage Management Plan document reference: 5-0019-220-PMA-00-PL-0059, revision 0, dated 6 August 2025 was reviewed as part of this audit. Compliance with this condition demonstrated below: (a) as per section 7.5 'Aboriginal Heritage' and section 9 'Environmental Mitigation and Management Measures' (b) as per section 9.4 'Additional works required' (c) as per section 9.4.2 'Salvage Measures', section 9.4.3 'Surface Artefact Collection' and section 9.6 'Management of Salvaged Aboriginal Objects' (d) as per section 9'Environmental Mitigation and Management Measures' (e) as per section 9.4.4 'Inspection of Scarred Trees' (f) as per Appendix B 'Unexpected and Incidental Finds Protocol'		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(f) an Unexpected Heritage Finds and Human Remains Procedure in accordance with **Condition E143**, with the requirement that Heritage NSW are contacted and consulted upon the discovery of human remains, prepared by a suitably qualified and experienced heritage specialist. ***Note:*** *Human remains that are found unexpectedly during work are under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.*			
3.24	C	C24	The **Flood Emergency Management Sub-plan** must include: (a) measures for managing flood risks during construction and address flood recovery; (b) consideration of flood risks associated with construction works; (c) details of the management and maintenance of flood mitigation measures; and (d) measures for the management and mitigation of flood impacts affected by temporary or permanent fencing and culverts, including installation of flood mitigation measures as soon as practical after construction of the relevant drainage structure.	Flood Emergency Management Plan document reference: 5-0019-220-PMA-00-PL-0060, Revision 0, dated 5 August 2025 was reviewed as part of this audit. Compliance with this condition demonstrated below: (a) as per section 8 ‘Flood Warning’, section 9 ‘Construction Flood Emergency Response Plan’ and section 10 ‘Flood Emergency Mitigation and Management Measures’ (b) as per section 6 ‘Existing Environment and Flood Characteristics, section 7 ‘Environmental Aspects and Impacts’ and Appendix E ‘Flood Risk Assessment’ (c) as per section 10 ‘Flood Emergency Mitigation and Management Measures’		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				(d) as per section 10 ‘Flood Emergency Mitigation and Management Measures’		
3.25	C	C25	The **Biosecurity Management Sub-plan** must include: (a) measures to minimise biosecurity risks to agricultural land; (b) protocols for animal diseases including emergency situations; (c) measures to manage pest and weed impacts; and (d) measures for the management and mitigation of biosecurity impacts affected by temporary or permanent works.	Biosecurity Management Plan document reference: 5-0019-220-PMA-00-PL-0061, revision 0, dated 28 July 2025 was reviewed as part of this audit. Compliance with this condition demonstrated below: (a) as per section 6.1 ‘Biosecurity Mitigation and Management Measures’ (b) as per section 6.4 ‘Emergency Management’ (c) as per section 6.2 ‘Weed, Pest and Pathogen Control’ (d) as per section 5.3 ‘Impacts from Temporary and Permanent Works’ and section 6 ‘Environmental Mitigation and Management Measures’		Compliant
3.26	C	C26	Construction must not commence until the **CEMP** and all **CEMP** Sub-plans have been approved by the Planning Secretary or endorsed by the **ER** (as applicable and as identified in the **CEMF** approved under **Condition C1**). The **CEMP** and **CEMP** Sub-plans, as approved by the Planning 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**	On the 19 March 2026, during the DPHI and CPHR site inspection, the use of Gate 1 was highlighted by DPHI as an unapproved access point in the CTTAMP. At the time JHG confirmed use of the gate (which had commenced during the set-up for the February Possession) and outlined that the CTTAMP was to be updated to include the access point in the 6-month review cycle which had been agreed with	**Non-Compliance I2S-02_NC-03:** The non-compliance was self-reported by IRPL to DPHI via non-compliance notification dated 25 March 2026, relating to the gate 1 access not included in	Non-Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			and sub-plans have been endorsed by the **ER** and approved by the Planning Secretary or **ER**.	the ER. JHG also detailed the access gate was included in a Consistency Assessment (CA) on the Inland Rail website. IRPL discussed the access point with the ER and it was agreed the CTTAMP was required to be updated to include the relevant information from the CA prior to commencing the activity/using the access point. The following actions were undertaken to address the non-compliance: - CTTAMP updated as per Condition C21 and under review. - CTTAMP updates to be finalised with ER endorsement once reviewed - Monitoring of use of gates as per weekly site inspection - *Use of gates captured under daily bulletin, dated 23 April 2026, stating "No Access Via Gate 1, Only Via Gate 2 Old Sydney Rd"* **CEMP Implementation**	the Construction Traffic, Transport and Access Management Plan (CTTAMP). During the DPHI and CPHR site inspection on 19 March 2026, the use of Gate 1 (Warrens Lane) and the associated access track was identified as an unapproved access point in the approved CTTAMP. JHG confirmed use of the gate had commenced during the set-up for the February 2026 possession and was included in a Consistency Assessment (CA) on the Inland Rail website; however, the CTTAMP was not updated prior	

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Inspections: Weekly inspections by JHG and IRPL. Presented Horizon 360 for Enviro and Sust combined inspection. “Non-Compliant” and % for items marked as ‘No’ require actions to be addressed. IRPL confirmed during the audit interview that following a meeting with DPHI, DPHI requested that the team report more formally for actions e.g., ERSED controls – tracking within H360. JHG also have access to IRPL’s system. Sighted Inspection INS-0015233, dated 3 April 2026. Three actions were raised regarding erosion and sediment controls. Sighted close-out of action ACT-0006724, dated 10 April 2026. Photos attached under Supporting Documentation tab. JHG receives notifications when actions are assigned. Reminder emails are also issued when actions are approaching or exceeding their due dates. An email from IRPL, dated 22 April 2026, was sighted, confirming that three actions are overdue. Also sighted JHG inspections on Soteria. Sighted Inspection Section 4 – Cut and fill, Piling Run Boundary Creek, dated 19 April 2026. An action (ACT-0193255) was	to the use of the gate and access track. **Opportunity for Improvement I2S-02_OFI-02:** Actions raised in Soteria did not always have a photo showing what was required for close out. It is recommended that a photo of the required action be included for traceability purposes. Additionally, for both IRPL and JHG, actions were assigned against personnel that were on leave or offsite. It is recommended to assign actions in Soteria appropriately. It is also recommended to investigate options to potentially assign to a	

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				raised regarding measures to prevent spillage from equipment. The action was due on 22 April 2025 and remains open. Sighted Pre and Post Rainfall inspection checklist INS-0126468, dated 29 March 2026. A total of 35 mm of rainfall was recorded at the site. All erosion and sediment controls appeared to be worked effectively, with no surface water runoff observed. Supporting pre and post-rainfall photographs are included in the checklist. **Review of Risk Register:** Update as part of JHG CEMP 6-monthly as presented as evidence. No changes noted by JHG. IRPL review actioned monthly. Review occurs monthly for A2P as a whole – sighted Risk Id 11293 “Flood design approvals delays may impact construction of permanent works in flood criteria exceedance areas” last reviewed on 3 March 2026. The cause and consequences is also outlined in the document. Sighted Risk Id 11455 “Delays in approvals of baseline monitoring and fauna connectivity strategy may impact	group as opposed to individuals, or to re-assign actions to other available personnel to ensure timely close out.	

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				environmental approvals and construction commencement” last reviewed on 3 March 2026. JHG work packs + Activity Method Statements (AMS) also contain risk registers. IRPL are invited to JHG AMS risk meetings which cover specific activities – following this discussion, a specific risk register is produced and included into the AMS.		
CONSTRUCTION MONITORING PROGRAM						
3.27	C	C27	Except as provided by **Condition C1** the following **Construction Monitoring Programs** must be prepared in consultation with the relevant state 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**.	The following construction programs have been prepared and implemented in consultation with relevant stakeholders: (a) Noise and Vibration Monitoring Program – incorporated as Appendix G within Noise and Vibration Management Plan. (b) Surface Water Monitoring Program – incorporated as Appendix B within Soil and Water Management Plan (c) Traffic Monitoring Program – incorporated as section 11.1 ‘Monitoring Program’ within Construction Traffic, Transport and Access Management Plan.		Not Triggered

	Required Construction Monitoring Programs	Relevant government authorities to be consulted for each Construction Monitoring Program
(a)	Noise and vibration	Nil
(b)	Surface water	DCCEEW Water, Crown Lands and relevant Councils

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(c) Traffic, transport and access management TfNSW and relevant Councils	Consultation was as reviewed during the initial audit. Timing of this condition is no longer triggered.		
3.28	C	C28	Each **Construction Monitoring Program (CMP)** must have consideration of SMART principles and provide: (a) details of baseline data available; (b) details of 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 and reasons for choosing the location; (g) the reporting of monitoring results and analysis results against relevant criteria; (h) details of the methods that will be used to analyse the monitoring data; (i) procedures to identify and implement additional mitigation measures where the results of the monitoring indicate unacceptable project impacts; (j) any consultation to be undertaken in relation to the monitoring programs; and (k) any specific requirements as required by **Condition C29**.	Construction Monitoring Programs provide: (a) as per section 6.1 of SWMP; section 2.1 NVMP; and section 11.1.1 of CTTAMP (b) as per section 6.1 SWMP; section 2 NVMP; and section 11.1.1 of CTTAMP (c) as per section 6 SWMP; section 4 & Section 5 of NVMP; and section 11.1.3 of CTTAMP (d) as per section 6.3 SWMP; section 4 & Section 5 OF NVMP; and 11.1.3 of CTTAMP (e) as per section 6.6 SWMP; section 4 & Section 5 of NVMP; and 11.1.3 of CTTAMP (f) as per section 6.2 SWMP; section 4 & Section 5 of NVMP; and 11.1.3 of CTTAMP (g) as per section 7.6 SWMP; section 3 & section 7 of NVMP; and 11.1.3 of CTTAMP (h) as per section 6.6 SWMP; section 4, section 5 & section 6 of NVMP; and 11.1.3 of CTTAMP (i) as per section 6.10 of SWMP; section 6.2 of NVMP; and 11.1.3 of CTTAMP (j) as per section 2.5 of SWMP; section 1.7 of NVMP		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				(k) Not applicable for NVMP and CTTAMP		
3.29	C	C29	The **Surface Water Monitoring Program** must be prepared in accordance with the requirements of **Condition E84 to E85**.	Surface Water Monitoring Program has been prepared and included within Soil and Water Management Plan Rev. 0, dated 4 August 2025 as presented as evidence. The monitoring program was prepared in consultation with DCEEW – consultation summary report included under Appendix A of the Soil and Water Management Plan. Surface Water Monitoring Program for construction was approved by DPHI as per approval letter, dated 4 September 2025 as verified during the initial audit. Surface water monitoring report every 6-months. Implementation has not yet been triggered.		Compliant
3.30	C	C30	The **Noise Monitoring Program** must be prepared and implemented in accordance with the requirements of *Approved Methods for the Measurement and Analysis of Environmental Noise* (EPA).	As per section 10.3 'Monitoring and Inspections' within the Noise and Vibration Management Plan, the Noise Monitoring Program was prepared in accordance with the requirements of Approved Methods for the Measurement and Analysis of Environmental Noise (EPA).		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
3.31	C	C31	CMPs must be submitted to the Planning Secretary for approval except those permitted to be endorsed by others pursuant to a **CEMF** approved by the Planning Secretary under **Condition C1**.	CMPs were submitted to DPHI for approval as evidenced during the initial audit. This condition was not triggered in this audit period.		Not Triggered
3.32	C	C32	Where a **CMP** requires Planning Secretary's approval, the **CMP** must be endorsed by the **ER** and then submitted to the Planning 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 each stage.	Prior to commencement of construction condition was reviewed as compliant during the initial audit. This condition is no longer triggered.		Not Triggered
3.33	C	C33	**CMP(s)** not requiring the Planning Secretary's approval, but requiring **ER** endorsement, must be submitted to the **ER** 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. The **CMP(s)** must be endorsed by the **ER** as being consistent with the conditions of this approval and all undertakings made in the documents listed in **Condition A1**.	Prior to commencement of construction condition was reviewed as compliant during the initial audit. This condition is no longer triggered.		Not Triggered
3.34	C	C34	Construction must not commence until the relevant **CMP(s)** have been approved by the Planning Secretary or endorsed by the **ER,** (as applicable and as identified in the **CEMF** approved under **Condition C1**), and all relevant baseline data for the specific construction activity has been collected.	Prior to commencement of construction condition was reviewed as compliant during the initial audit. This condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
3.35	C	C35	The **CMP(s)**, as approved or endorsed (as relevant), 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.	Noise monitoring occurred during possession under Environmental Works Method Statements (EWMS): Sighted attended noise monitoring, dated 1 November 2025. The monitoring was undertaken for night works (OOHW Works) on 31 October 2025. No exceedances were recorded. JHG confirmed during the audit interview that monitoring is yet to be undertaken under Monitoring Program, and that SiteHive (24/7 monitoring system) will be used for noise monitoring.		Compliant
3.36	C	C36	The results of the **CMP(s)** must be made publicly available in the form of a **Construction Monitoring Report** at the frequency identified in the relevant **CMP**. ***Note**: Where a relevant **CEMP Sub-plan** exists, the relevant **Construction Monitoring Program** may be incorporated into that **CEMP Sub-plan**.*	Quarterly Monitoring Report document no. 6-0019-220-EEC-00-RP-0009, Rev. A, drafted by JHG and submitted to IRPL for noise. The reports showed no noise exceedances recorded. No data contained for remaining areas; no vibration monitoring, traffic, transport and access management, or surface water monitoring undertaken during period – timing of this is triggered under 6-monthly reports as per monitoring programs.	**Opportunity for Improvement I2S-02_OFI-03:** Noise and vibration monitoring results are being reported quarterly; this misaligns to the frequency defined within the Construction Monitoring Program (6-monthly). It is	Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Sighted submission of monitoring report to IRPL via Aconex ref. JH-TRANSMIT-002651, dated 16 April 2026. Vibration risk – only Illabo and Stockinbingal Schools which are ~1km or more from boundary. No impacts predicted at sensitive receivers; no active churches / places of worship, childcare centres, or hospitals, etc. SiteHive (24/7 monitoring technology) in place but attended monitoring actioned for monitoring reports. Sighted following Calibration records for noise monitors: • Calibration Certificate C26214-V1, dated 20 March 2026. • Calibration Certificate C26215-V1, dated 20 March 2026. • Calibration Certificate C26216-V1, dated 20 March 2026.	recommended that JHG review and confirm reporting requirements.	
PART D - OPERATIONAL ENVIRONMENTAL MANAGEMENT						
OPERATIONAL ENVIRONMENTAL MANAGEMENT						

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
4.1	D	D1	An **Operational Environmental Management Plan (OEMP)** must be prepared having regard to the *Environmental Management Plan Guideline for Infrastructure Projects* (Department of Planning, Industry and Environment, 2020). The **OEMP** must 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. **Condition D1** does not apply if **Condition D2** of this approval applies.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered
4.2	D	D2	An **OEMP** is not required for the CSSI if the Proponent has an **Environmental Management System** (**EMS**) or equivalent as agreed with the Planning Secretary, and demonstrates, to the satisfaction of the Planning Secretary, that through the **EMS** or equivalent: (a) the performance outcomes, commitments and mitigation measures, made and identified in the documents listed in **Condition A1**, and specified relevant terms of this approval can be achieved; (b) issues identified through ongoing risk analysis can be managed; (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; (d) procedures and mechanisms are in place: (i) for the community to discuss or provide feedback to the Proponent;	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(ii) through which the Proponent will respond to enquiries or feedback from the community; and (iii) resolve any issues and mediate any disputes that may arise in relation to the environmental management and delivery of the CSSI, including disputes regarding rectification or compensation. At a minimum, the EMS must address fencing provision, failure compensation mechanisms and repair, maintenance of fences and culverts, with strict observance of biosecurity protocols, consistent with the *Biosecurity Act 2015* (NSW).			
4.3	D	D3	The **OEMP** or **EMS** or equivalent as agreed with the Planning Secretary, must be submitted to the Planning Secretary for information no later than one (1) month before the commencement of operation, or where operation is staged, no later than one (1) month before the commencement of operation of that stage.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered
4.4	D	D4	The **OEMP** or **EMS** or equivalent as agreed with the Planning Secretary, as submitted to the Planning Secretary and amended from time to time, must be implemented for the duration of operation.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered
OPERATIONAL MONITORING PROGRAM						

<table>
<tr><th>ID No.</th><th>CSSI Part</th><th>Req. No.</th><th>SSI-9406 Requirement</th><th>Audit Evidence</th><th>Audit Findings / Recommendations</th><th>Compliance Rating</th></tr>
<tr><td>4.5</td><td>D</td><td>D5</td><td>The following Operational Monitoring Programs must be prepared in consultation with the relevant authorities identified for each Operational Monitoring Program to compare actual operational performance against predicted performance. Details of all information requested by an agency during consultation must be provided to the Planning Secretary as part of any submission of the relevant Operational Monitoring Program, including copies of all correspondence from those agencies as required by Condition A10.
<table>
<tr><th></th><th>Operational Monitoring Programs</th><th>Relevant authority(s) and council(s) to be consulted for each Operational Monitoring Program</th></tr>
<tr><td>(a)</td><td>Fauna Connectivity Monitoring, Predator Prevention and Adaptive Mitigation Program</td><td>BCS and relevant council(s)</td></tr>
<tr><td>(b)</td><td>Surface Water Monitoring Program</td><td>DECCW Water</td></tr>
</table></td><td>The project is still in construction phase. This condition is not yet triggered.</td><td></td><td>Not Triggered</td></tr>
<tr><td>4.6</td><td>D</td><td>D6</td><td>Each operational monitoring program must include:
(a) details of baseline data;
(b) details of all monitoring of the CSSI to be undertaken;
(c) the parameters of the CSSI to be monitored;
(d) the frequency and lifespan of monitoring to be undertaken;</td><td>The project is still in construction phase. This condition is not yet triggered.</td><td></td><td>Not Triggered</td></tr>
</table>

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(e) the location of monitoring; (f) the reporting of monitoring and analysis results against relevant criteria; (g) details of the methods that will be employed to analyse the monitoring data; (h) procedures and/or trigger points to identify and implement additional mitigation measures where results of monitoring are unsatisfactory; (i) consideration of SMART principles; and (j) any consultation to be undertaken in relation to the monitoring programs.			
4.7	D	D7	An **Operational Fauna Connectivity Monitoring, Predator Prevention and Adaptive Mitigation Program** must be implemented for a period of ten (10) years, or as otherwise agreed with the Planning Secretary, to evaluate the effectiveness of fauna connectivity measures and any adaptive management measures. The Program must be prepared by a suitably qualified and experienced ecologist(s) with experience in fauna connectivity and crossings and experimental design and include regular seasonal ongoing monitoring and not be limited to: (a) target species, including: (i) Brown Treecreeper; (ii) Diamond Firetail; (iii) Flame Robin; (iv) Grey-Crowned Babbler;	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(v) Rainbow Bee-eater; (vi) Scarlet Robin; (vii) Speckled Warbler; (viii) Superb Parrot; (ix) Varied Sittella; (x) White-fronted Chat; and (xi) Squirrel Glider; (b) baseline monitoring data as required by **Condition E40**; (c) performance indicators, type, duration and frequency of monitoring, inspections and condition assessments; (d) the effectiveness of new and existing fauna connectivity measures, including fauna exclusion fencing, fauna furniture and predation prevention measures; (e) visual inspections of fauna connectivity structures including rope crossing and fauna exclusion fencing, following a severe weather event and/or record of fauna mortality; (f) condition assessments of fauna connectivity measures including habitat refuges and predation prevention measures; (g) an adaptive monitoring program to assess the effectiveness of the mitigation measures identified in **Conditions E44** to **E45** and whether changes are required to the monitoring program; (h) a process to ensure adaptive management measures, including changes to fauna furniture, predator			

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			prevention or mitigation in response to the results of monitoring completed in accordance with **Condition D7(a)** to **(g)** above, and a timeframe for their implementation; and (i) timeframes for the rectification of defects identified during inspections.			
4.8	D	D8	At the end of 10 years, the Proponent must consult with BCS to determine whether ongoing monitoring, predator prevention and mitigation measures are required to continue. Any ongoing monitoring, prevention and mitigation measures recommended by BCS must be undertaken, unless otherwise agreed to by the Planning Secretary. The **Operational Monitoring Program(s)** must be submitted to the Planning Secretary for approval at least three (3) months prior to the commencement of operation.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered
4.9	D	D9	Operation must not commence until the Planning Secretary has approved all of the required Operational Monitoring Programs, and all relevant baseline data has been collected.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered
4.10	D	D10	The **Operational Monitoring Programs**, as approved by the Planning Secretary, must be implemented for the duration identified in the terms of this approval. Where no duration is specified in this approval, they must be implemented for the duration specified in the relevant **Operational Monitoring Program** or as specified by the Planning Secretary.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
4.11	D	D11	The results of the **Operational Monitoring Programs** must be submitted to the Planning Secretary, and relevant regulatory authorities, for information in the form of an **Operational Monitoring Report** at the frequency identified in the in the terms of this approval. Where no frequency is identified in this approval, the results must be submitted at the frequency identified in the relevant **Operational Monitoring Program**.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered
4.12	D	D12	Where a relevant **OEMP Sub-plan** exists, the relevant **Operational Monitoring Program** may be incorporated into that **OEMP Sub-plan**.	The project is still in construction phase. This condition is not yet triggered.		Not Triggered
PART E - KEY ISSUE CONDITIONS						
NOISE AND VIBRATION						
5.1	E	E1	Work 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.	Site Induction as presented was noted to include a section on what is considered normal working hours, that is: • Monday to Friday 7am – 6pm, • Saturday 8am – 1pm, • Sundays & Public Holiday, no works.		Compliant

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				CEMP Section 7.5 "Working Hours" also outlines the construction working hours in compliance with E1.		
5.2	E	E2	Despite **Condition E1**, work (excluding establishment of the temporary workforce accommodation facilities) may be undertaken during the hours of 6:00 am to 6:00 pm each day provided: (a) no work affects any given receiver between the hours of 6:00 pm on a Saturday and 7:00 am on a Monday every second week; (b) only low impact noise activities (defined in **Condition E3(b)**) are permitted between 6.00 am and 7.00 am; and (c) consultation with affected receivers occurs at least every three months, or more frequently following complaints recorded in the Complaints Register required by **Condition B8**, to determine respite or additional mitigation measures. In consulting with the affected receivers, the following must be provided: (i) a progressive schedule of anticipated hours of works beyond those permitted by **Condition E1** for periods of no less than three months; (ii) a description of the anticipated construction activities, location and duration of the work;	Works have only commenced under the E2 framework. Out-of-Hours Work (OOHW) is planned in accordance with lookahead requirements, including Sunday work restrictions and avoidance of consecutive weekend works at the same receivers. In line with the monthly Consultation Notifications to the Community, the April 2026 notification was sighted. The notified activities relate to general construction works under standard notification requirements, impacting approximately 21 receivers. Construction is planned to occur during standard working hours: 7am to 6pm, Monday to Sunday. Some work may also take place between 6am and 6pm on any day, with limits on early morning activities and in consultation with affected stakeholders. Construction is planned to occur during standard working hours: 7am to 6pm, Monday to Sunday. Some work may also take place between 6am and 6pm on any day, with limits on early morning activities and in consultation		Compliant

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			(iii) the noise characteristics and likely noise levels of the work; (iv) the practical measures implemented to minimise noisy work and heavy vehicle movements before 7:00am and any time on a Sunday; and (v) mitigation and management measures which aim to achieve the relevant noise management levels identified in the documents listed under **Condition A1** (including the circumstances in which respite or other offers will be available and details about how the affected receivers can access these). Evidence of consultation and the outcomes, including any changes to construction practices or staging, must be reviewed by the **ER** and provided to the Planning Secretary on request. ***Notes:*** *1. This condition does not affect any other offers of respite or noise mitigation required under this approval.* *2. This condition does not prevent a working schedule of ten consecutive days of work followed by four consecutive days of no work provided one day of no work is a Sunday and that consultation with affected receivers about respite and mitigation occurs every three months*	with affected stakeholders. The proposed activities includes geotechnical investigations, materials delivery, fence installation , general earthworks, clearing and grubbing activities, piling works and services works etc. OOHW permits are issued for information only and do not require approval from the ER. At the time of inspection, no works were being undertaken under the OOHW Protocol.		

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5.3	E	E3	**Variation to Work Hours** Despite **Conditions E1** and **E2** work may be undertaken outside the hours specified in the following circumstances: (a) Safety and emergencies, including: (i) for the delivery of materials required by the NSW Police Force or other authority for safety reasons; or (ii) 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 (b) Low impact noise activities, including: (i) construction that causes LAeq(15 minute) noise levels: • no more than 5 dB(A) above the rating background level at any residence in accordance with the ICNG, and • no more than the 'noise affected' NMLs specified in Table 3 of the ICNG at other sensitive land uses; and (ii) construction that causes LAFmax noise levels no more than 15 dB(A) above the	(a) No emergency OOHW works required to date as advised by JHG. (b) Low impact works fall under the OOHW permit process as advised by JHG. (c) The following OOHW Permits were provided as evidence: • Subject to EPL - OOHW Permit PER/I2S/00327, permit no. 008, dated 5 February 2026, for the Temporary Water Supply - Night Works from 8:00PM 25 February to 6:00AM 26 February 2026. The OOHW was approved on 5 February 2026 by JHG. • Subject to EPL – OOHW Permit PER/I2S/00335, permit no. 009-, dated 10 February 2026, for the Ulandra Creek drilling works from 7:00AM to 6:00PM 15 February 2026 (Sunday). The OOHW was approved on 10 February 2026 by JHG. • OOHW Permit PER/I2S/00338, Permit No. 0010, dated 12 February 2026, for the February possession works from 5:00AM 28 Feb to 11:30PM 1 March. The OOHW was	**Opportunity for Improvement I2S-02_OFI-04:** The Out-Of-Hours-Work (OOHW) Permit sample showed ER approval as marked which is not a project requirement, with the permit unsigned by JHG and the Conditions of Approval section left blank. It is recommended to ensure all OOHW permits are completed accurately and in full.	Compliant

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			rating background level at any residence during the night period as defined in the *Noise Policy for Industry* (EPA, 2017); and (iii) construction that causes: - continuous or impulsive vibration values, measured at the most affected residence, are no more than the preferred values for human exposure to vibration specified in Table 2.2 of *Assessing vibration: A technical guideline* (DEC, 2006), or - intermittent vibration values, measured at the most affected residence, are no more than the preferred values for human exposure to vibration, specified in Table 2.4 of *Assessing vibration: A technical guideline* (DEC, 2006); or (c) By approval or agreement, including: (i) where different construction hours are permitted or required under an EPL in force in respect of the CSSI; or (ii) works which are not subject to an EPL that are approved under an **Out-of-Hours**	approved on 12 February 2026 by JHG. - OOHW Permit PER/I2S/00339, Permit No. 0011, dated 22 March 2026, for haul road treatment prior to commencement of shift from 30 March to 30 September 2026 – 5:00AM to 7:00AM Monday to Saturday. Sighted hold point JH-HP-OOOO58 release of February 2026 possession works via Aconex ref. IR2200-RTHP-000072, dated 24 February 2026. The Hold Point release was initially submitted by JHG on 13 February 2026; however, community notification details were not included in the initial submission. Further information was subsequently requested by IRPL and was provided on 20 February 2026, enabling the release of the Hold Point.		

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			Work Protocol as required by **Condition E5**; or (iii) negotiated agreements with directly affected residents and sensitive land uses. On becoming aware of the need for emergency work in accordance with **Condition E3(a)(ii)** above, the **ER**, the Planning Secretary and the EPA must be notified of the reasons for such work. The Proponent must use best endeavors to notify as soon as practicable all noise and/or vibration affected sensitive land uses of the likely impact and duration of those work. All negotiated agreements with owners and occupiers of sensitive land uses to carry out work in accordance with **Condition E3(c)(iii)** must be in writing, and include the hours, duration and likely noise levels compared to the NML defined in the ICNG. The negotiated agreement must be agreed and finalised before the commencement of work affecting the sensitive land uses.			
5.4	E	E4	**Highly Noise Intensive Work** Except as permitted by an EPL or approved through an Out of Hours Work Protocol (for work not subject to an EPL), **highly noise intensive work** (defined in Table 1) 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	JHG confirmed during the audit interview that there has been no highly noise intensive work to date. Upcoming grinding and blasting; however, these are expected to be during standard hours.		Not Triggered

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			Friday (excluding public holidays); (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 of at least one hour between each block of highly noise intensive work. 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 work that is the subject of this condition.			
5.5	E	E5	**Out-of-Hours Work Protocol – Work not subject to an EPL** 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 any 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	Out-of-Hours Work Protocol document no. 5-0019-220-EEC-00-PO-0001, Rev. E, dated 17 June 2025 as reviewed as part of this audit. The OOHW Protocol is included within the CNVMP under Appendix F. The CNVMP was approved by DPHI on 15 September 2025 as evidenced during the initial audit. Consultation with EPA is addressed under section 1.3. Compliance with this condition demonstrated below: (a) as per section 3.1 'Construction Noise and Vibration Impact Statement', section 3.2 'OOHW Permit' and section 3.4 'Approval of OOHW' (b) as per section 3.1 'Construction Noise and Vibration Impact		Compliant

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			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) the ER review all proposed out of hours activities and confirm their risk levels; (ii) low risk activities can be approved by the ER, and (iii) high risk activities that are approved by the Planning Secretary; and (e) identify Department, EPA and community notification arrangements for approved out-of- hours work, which may be detailed in the Communication Strategy.	Statement', section 3.3 'OOHW Noise and Vibration Management and Mitigation Measures' and section 4 'OOHW Stakeholder Consultation and Communication' (c) as per section 4.2 'Coordination of OOHW' (d) as per section 3 'OOHW Protocol', section 3.2 'OOHW Permit' and section 3.4 'Approval of OOHW' (e) as per section 4.1 'General' JHG confirmed during the audit interview that no work has been triggered under the OOHW Protocol and that all OOHW will be under the EPL.		
5.6	E	E6	Work that results in noise levels above NMLs at community, religious, educational institutions and noise and vibration-sensitive businesses and critical working areas (such as theatres, laboratories and operating theatres) must not be timetabled within sensitive periods or during important events, unless other reasonable arrangements with the affected institutions or businesses are made at no cost to the affected institution or business or as otherwise approved by	The only sensitive receiver is Stockinbingal School; however, no works undertaken as confirmed by JHG during the audit interview.		Not Triggered

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			the Planning Secretary.			
5.7	E	E7	**Noise and Vibration Mitigation** Mitigation measures must be implemented with the aim of achieving the following construction noise management levels and vibration criteria: (a) construction 'noise affected' NMLs established using the ICNG; (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; (e) the vibration limits set out in the German standard DIN 4150-3: Structural vibration- effects of vibration on structures (for structural damage); and (f) Project noise trigger levels and maximum noise level event trigger levels established using the *Noise Policy for Industry* (EPA, 2017) for noise generated by mechanical plant and on-site vehicles at temporary workforce accommodation facilities. Any work identified as exceeding the NMLs and/or vibration criteria must be managed in accordance with the	Quarterly Monitoring Report document no. 6-0019-220-EEC-00-RP-0009, Rev. A, drafted by JHG and submitted to IRPL for noise as sighted. The report confirmed that no noise exceedances have been recorded during the reporting period. Sighted submission of monitoring report to IRPL via Aconex ref. JH-TRANSMIT-002651, dated 16 April 2026. SiteHive (24/7 monitoring system) in place but attended monitoring actioned for monitoring reports. Sighted the following Calibration records for noise monitors: • Calibration Certificate C26214-V1, dated 20 March 2026. • Calibration Certificate C26215-V1, dated 20 March 2026. • Calibration Certificate C26216-V1, dated 20 March 2026.		Compliant

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			Construction Noise and Vibration Management Sub-plan required by **Condition C17.** ***Note:*** *The ICNG identifies 'particularly annoying' activities that require the addition of 5 dB(A) to the predicted level before comparing to the construction Noise Management Level.*			
5.8	E	E8	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 C17.**	JHG confirmed during the audit interview that owners and occupiers of properties at risk are outside of the vibration limits.		Not Triggered
5.9	E	E9	**Construction Noise - Coordination and Respite** The Proponent must coordinate work with other Inland Rail projects, including any work to relocate or connect utilities conducted under any approval pathway, to minimise cumulative and consecutive noise and vibration impacts and maximise respite for affected sensitive receivers. Coordination and mitigation measures must be detailed in the **Noise and Vibration Management Sub-plan** required by **Condition C17.**	JHG confirmed during the audit interview that fortnightly coordination meetings are held with the A2I Project. Sighted email correspondence from JHG to Martinus (Inland Rail – Albury to Illabo Project), dated 23 February 2026, regarding upcoming CSR works at Junee to Illabo, including construction details.		Compliant

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				Sighted email from Martinus, dated 1 March 2026, confirming that Out-of-Hours Work (OOHW) has been scheduled over a three-month period, with ongoing coordination of works. Sighted email from JHG, dated 12 April 2026, providing an OOHW Work Permit to Martinus for information.		
5.10	E	E10	**Blasting Management Strategy** If blasting is proposed during construction, a **Blast Management Strategy** must be prepared and must include: (a) sequencing and review of trial blasting to inform blasting; (b) regularity of blasting; (c) intensity of blasting; (d) monitoring blast overpressure and ground vibration; (e) consultation with utility asset owners and managers; (f) measures to minimise blasting impacts; (g) periods of relief; and (h) blasting program.	Sighted Blast Management Strategy, Rev. 1, document no. 5-0019-220-PMA-00-ST-0004, dated 20 March 2026. The Strategy was submitted to DPHI on 2 April 2026 for review. Sighted DPHI letter ref. SSI-9406-PA-82, dated 21 April 2026, requesting further information, with an attached comment sheet. The comment sheet identified the following items for clarification or update: • Confirmation of the location/potential location of the trial blast site • Removal of personal details from Table 7.3		Not Triggered

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				• Update to reflect the current timing of the blasting program • Clarification of the timeframe for community notification The Strategy has not yet been approved. Timing of this condition has not been triggered and will be reviewed at the next IEA.		
5.11	E	E11	The **Blast Management Strategy** must be endorsed by a suitably qualified and experienced person.	Sighted letter from Hutchison Weller, dated 24 March 2026, confirming the endorsement of Blast Management Strategy (BMS). The BMS was endorsed by John Hutchison, who hold a Master of Environmental Engineering from University of NSW) and certified as a Chartered Professional Engineer (CPEng) and active Member of the Australian Acoustical Society (AAS).		Compliant
5.12	E	E12	The **Blast Management Strategy** must be prepared in accordance with relevant guidelines to ensure that all blasting and associated activities are carried out so as not to generate unacceptable noise and vibration impacts or pose a significant risk to sensitive receivers.	Sighted letter from Hutchison Weller, dated 24 March 2026, confirming that the BMS has been prepared in compliance with condition E12.		Compliant

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5.13	E	E13	The **Blast Management Strategy** must be submitted to the Planning Secretary for approval no later than one month prior to the commencement of blasting. The Strategy as submitted to the Planning Secretary, must be implemented for all blasting activities.	Sighted DPHI submission ref. SSI-9406-PA-82, dated 2 April 2026. Sighted post approval receipt SSI-9406-PA-82, dated 2 April 2026. Commencement of blasting expected 2 May 2026 onwards.		Compliant
5.14	E	E14	Blasting associated with the CSSI must only be undertaken during the following hours: (a) 9:00 am to 5:00 pm, Monday to Friday, inclusive; (b) 9:00 am to 1:00 pm, Saturday; and (c) at no time on Sunday or on a public holiday; or as authorised through an EPL if blasting is proposed outside of these hours. This condition does not apply in the event of a direction from police or other relevant authority or utilities for safety or emergency reasons to avoid loss of life, property loss and/or to prevent environmental harm.	Blasting works have not yet occurred as confirmed by JHG during the audit interview.		Not Triggered
5.15	E	E15	**Noise Mitigation – Operational Noise Mitigation Measures – Rail** The Proponent must prepare an **Operational Noise and Vibration Review - Rail (ONVR - Rail**) to confirm noise and vibration control measures that would be implemented for operational rail elements of the CSSI. The **ONVR - Rail** and	The Operational Noise and Vibration Review (ONVR) is still in draft and under preparation as confirmed by IRPL and JHG during the audit interview. This condition is not yet triggered.		Not Triggered

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			identification and 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 and if noise walls/mounds are to be constructed along a road, the relevant roads authority. The **ONVR - Rail** must: (a) confirm the appropriate operational noise and vibration objectives and levels for each section at adjoining developments, including existing sensitive land uses; (b) confirm the operational noise and vibration predictions based on the final design. Confirmation must be based on an appropriately validated noise model (which has incorporated additional noise monitoring, and concurrent traffic counting, where necessary for model validation and/or calibration purposes). The noise and vibration modelling must consider as a minimum (but not limited to): (i) the number and type of locomotives and wagons required for each train type, (ii) track features and associated noise sources including trackform, track condition, turnouts, points, curves, crossing loops, and sidings, (iii) re-radiated noise from viaducts, bridges, culverts, and other structures, (iv) train operating characteristics and associated noise sources including travelling at ruling train speed, notch			

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			settings, dynamic braking, changes in speed, and gradients, (v) safety devices such as warning horns and bells at level crossings. (vi) Identify and confirm sensitive receivers at which *Rail Infrastructure Noise Guideline* (EPA, 2013) trigger levels are predicted to be exceeded once the CSSI is operational and in 2040 as identified in documents listed in **Condition A1**; (c) review the suitability of the operational noise and vibration 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 and vibration objectives outlined in the *Rail Infrastructure Noise Guideline* once the CSSI is operational and in 2040 as identified in documents in listed in **Condition A1** after commencement of operation as notified in accordance with **Condition A7**. This review must consider: (i) local climate and impacts on existing cooling devices; (ii) alternative at-property mitigation measures where the physical condition of a receiver building would render acoustic glazing and seals ineffective; and (iii) all feasible barrier options. (d) Review the location of crossing loops, sidings, and level crossings, and investigate and implement			

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			practical measures to minimise adverse traffic, access and noise impacts; (e) describe the final suite of noise and vibration mitigation measures that will be implemented to achieve the objectives outlined in the *Rail Infrastructure Noise Guideline* once the CSSI is operational and in 2040 as identified in documents in listed in **Condition A1**, including the timing of implementation in accordance with **Condition E20**; (f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures; and (g) procedures for the management of operational noise and vibration complaints. The **ONVR - Rail** must be verified by an independent and suitably qualified acoustic expert and submitted to and approved by the Planning Secretary prior to whichever occurs first: either the implementation of any operational noise mitigation measures, or commencement of operation. The Proponent must make the **ONVR - Rail** publicly available.			
5.16	E	E16	Within one year of, and after ten years after commencement of operations, or as otherwise agreed with the Planning Secretary, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the rail operations of the CSSI against the noise performance predicted in the review of noise mitigation measures required by **Condition E15.** The Proponent must	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

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			prepare an **Operational Noise Compliance Report – Rail (ONCR - Rail)** to document this monitoring. The Report must include, but not necessarily be limited to: (a) noise monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under **Condition E15**; (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 identified as exceeding noise trigger levels and vibration trigger levels in the Rail Infrastructure Noise Guideline defined in the documents listed under **Condition A1**. (c) details of any complaints and enquiries received in relation to operational noise and vibration generated by the CSSI between the date of commencement of operation and the date the report was prepared; (d) any required recalibrations of the noise model taking into consideration factors such as noise monitoring and actual train movements; (e) an assessment of the performance and effectiveness of applied noise mitigation measures together with a review and if necessary, reassessment of mitigation measures; and (f) identification of additional measures to those identified in the review of noise mitigation measures required by Condition E15, that would be implemented with the objective of meeting the criteria outlined in the Rail Infrastructure Noise Guideline, when these measures			

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			would be implemented and how their effectiveness would be measured and reported to the Planning Secretary and the EPA. The **ONCR - Rail** is to be verified by a suitably qualified and experienced noise and vibration expert. The **ONCR - Rail** must be submitted to the Planning Secretary and the EPA for approval within 90 days of completing the operational noise monitoring. The Proponent must make the **ONCR - Rail** publicly available.			
5.17	E	E17	**Noise Mitigation – Operational Noise Mitigation Measures – Road Traffic** The Proponent must prepare an **Operational Noise and Vibration Review – Road (ONVR - Road**) to confirm noise and vibration control measures that would be implemented for the operation of the road traffic related parts of the CSSI. The **ONVR - Road** and identification and 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 and if noise walls/mounds are to be constructed along a classified road, TfNSW. The **ONVR-Road** must: (a) confirm the appropriate operational noise and vibration objectives and levels including existing sensitive land uses;	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

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			(b) confirm the operational noise and vibration predictions based on the final design. Confirmation must be based on an appropriately validated noise model (which has incorporated additional noise monitoring, and concurrent traffic counting, where necessary for model validation and/or calibration purposes). (c) Identify / confirm sensitive receivers at which the criteria set out in the *Road Noise Policy* (EPA, 2011) are predicted to be exceeded once the CSSI is operational and ten years after operation commences. (d) review the suitability of the operational noise and vibration 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 and vibration criteria outlined in the *Road Noise Policy* once the CSSI is operational and ten years after as identified in documents in listed in **Condition A1** after commencement of operation as notified in accordance with **Condition A7**. (e) describe the final suite of noise and vibration mitigation measures that will be implemented to achieve the objectives outlined in the *Road Noise Policy* once the CSSI is operational and ten years after as identified in documents in listed in **Condition A1**, including the timing of implementation in accordance with **Condition E20**; (f) include a consultation strategy to seek feedback from directly affected landowners on the noise and vibration mitigation measures; and (g) procedures for the management of operational noise and vibration complaints.			

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			The **ONVR - Road** must be verified by an independent and suitably qualified acoustic expert and submitted to the Planning Secretary for approval before whichever occurs first: either the implementation of any operational noise mitigation measures, or commencement of operation. The Proponent must make the **ONVR - Road** publicly available.			
5.18	E	E18	Within one year of, and after ten years after commencement of operations, or as otherwise agreed with the Planning Secretary, the Proponent must undertake monitoring of operational noise to compare actual noise performance of the road traffic related parts of the CSSI against the noise performance predicted in the review of noise mitigation measures required by **Condition** E17. The Proponent must prepare an **Operational Noise Compliance Report – Road (ONCR - Road)** to document this monitoring. The Report must include, but not necessarily be limited to: (a) noise monitoring to assess compliance with the operational noise levels predicted in the review of operational noise mitigation measures required under **Condition** E17; (b) methodology, location and frequency of noise monitoring undertaken; (c) details of any complaints and enquiries received in relation to operational noise and vibration generated by the CSSI between the date of commencement of operation and the date the report was prepared;	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

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			(d) any required recalibrations of the noise model taking into consideration factors such as noise monitoring and actual traffic movements; (e) an assessment of the performance and effectiveness of applied noise mitigation measures together with a review and if necessary, reassessment of mitigation measures; and (f) identification of additional measures to those identified in the review of noise mitigation measures required by Condition E17, that would be implemented with the objective of meeting the criteria outlined in the Road Noise Policy, when these measures would be implemented and how their effectiveness would be measured and reported to the Planning Secretary and the EPA. The **ONCR - Road** is to be verified by a suitably qualified and experienced noise and vibration expert. The **ONCR - Road** must be submitted to the Planning Secretary and the EPA for information within 90 days of completing the operational noise monitoring. The Proponent must make the **ONCR - Road** publicly available.			
5.19	E	E19	Noise and vibration control measures identified in the **ONVRs** must be implemented.	ONVR is still in draft and under preparation as confirmed by IRPL and JHG during the audit interview. This condition is not yet triggered.		Not Triggered

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5.20	E	E20	Operational noise mitigation measures identified in **Condition E15** and **Condition E17** (such as at-property architectural treatments) that will not be affected by construction work, must be implemented: (a) within twelve (12) months of the commencement of construction affecting the impacted receiver/s; (b) in the case of at-property treatments, as agreed with the landowner; or (c) as agreed by the Planning Secretary.	ONVR is still in draft and under preparation as confirmed by IRPL and JHG during the audit interview. This condition is not yet triggered.		Not Triggered
5.21	E	E21	Where implementation of operational noise mitigation measures are not proposed in accordance with **Condition E20**, 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 E15** and **Condition E17** are implemented. The report must be endorsed by the **ER** and submitted to the Planning Secretary prior to the commencement of construction which would affect the identified sensitive receivers.	ONVR is still in draft and under preparation as confirmed by IRPL and JHG during the audit interview. This condition is not yet triggered.		Not Triggered
5.22	E	E22	**Maintenance of Track Friction Modification Systems** Track friction modification systems and track condition maintenance regimes must be maintained to ensure that they maintain the performance of the SSI as stated in the	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

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			ONVR – Rail (Condition E15) throughout the life of the project.			
BIODIVERSITY						
5.23	E	E23	The clearing of native vegetation must be minimised to the greatest extent practicable with the objective of reducing impacts to threatened ecological communities, threatened species and their habitat.	Sighted Clearing Permit CP015, PPW no. PER/I2S/00314 for the duration 2/2/2026 to 6/4/2026 – clearing and grubbing works within section 1 and section 2. Sighted Clearing Permit CP012, PPW no. PER/I2S/00277 for the duration 27/1/2026 to 27/4/2026 – clearing and grubbing works within section 5 and section 6. Sighted Hold Point Release correspondence on Aconex for Clearing and Grubbing – Section 1 and Section 2. The initial HP release was requested on 28 January 2026 via Aconex ref. JH-HP-000051 with HP-01 to HP-06 details including permits. The additional information was requested by IRPL on 30 January 2026 which was then provided by JH on 4 February 2026. The HP was released by IRPL on 4 February 2026 via Aconex ref. IR2200-RTHP-000062. Permits developed by JHG, discussed extent of vegetation with engineers		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				planned for clearing; construction team provided outline of reasons for clearing. Worked in the field with construction team to reduce clearing. DPHI came to site on 18 February 2026 and queried regarding Condition E23. Sighted IRPL Response Comment Sheet with details regarding hold point release, flagging, GIS data and preclearance survey. The project has reduced clearing at a cul-de-sac through amended design for Stockinbingal (Burley Griffin Way) with design drawing sighted during the audit interview. The post-clearance report is required to be prepared within three months of completion of clearance activities. The Ecologist is in the process of preparing the report, which will be provided upon completion of the overall clearing works. Timing is not yet triggered. JHG advised during the audit interview that no clearing of bushrock has been undertaken as removal will occur as part of the blasting process. At Cut 20 one outcrop		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				area was cleared, the Ecologist was present on site, and a post-clearance report is currently being prepared by OzArk. No rock has been removed to date. The rocky area will be cleared as part of the blasting process, with a pre-clearance survey to be undertaken prior to works. Preclearance survey for the rocky outcrop area was provided by Ecologist to JHG on 24 April 2026 via email as sighted. The data provided by Ecologist also confirmed that outcrop area was cleared on 22 March 2026 under supervision.		
5.24	E	E24	Prior to the commencement of work that would impact biodiversity values of (a)-(g), the Proponent must demonstrate to the satisfaction of the Planning Secretary that impacts to the following potential serious and irreversible impact entities have been avoided to the greatest extent possible: (a) White Box-Yellow Box Blakely's Red Gum Grassy Woodland and Derived Native Grassland comprising Plant Community Types (PCT) PCT 266, PCT 276, PCT 277, PCT 347 (b) *Caladenia arenaria* / Sand-hill Spider Orchid (c) *Caladenia concolor / Crimson Spider Orchid* (d) *Euphrasia arguta / Euphrasia arguta*	Assessment of Unsurveyed Area Report Rev. 2 prepared by WSP, dated 28/7/2025 as presented. Consultation records included under section 2.7 'Consultation. The report was submitted to DPHI on 11 August 2025. Sighted approval letter from DPHI, dated 20 August 2025, confirming the compliance with E24 – Impacts to Serious and Irreversible Impact (SAII) entities have been reduced and avoided to the greatest extent possible. Sighted letter from CPHR, dated 10 November 2025, confirming the satisfaction with the memo submitted on 24		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(e) *Grevillea wilkinsonii / Tumut Grevillea* (f) *Indigofera efoliata / Leafless Indigo* (g) *Prasophyllum sp. Wybong / Prasophyllum sp. Wybong* Avoidance, reduction in impacts and additional conservation measures must be documented in consultation with BCS and the Planning Secretary.	October 2025. The CPHR also advised one minor error requires correction in the memo. Sighted Memorandum, dated 18 November 2025, confirming the compliance with E24 and E33(d). Sighted DPHI approval letter ref. SSI-9406-PA-54, dated 1 December 2025, confirming the approval of memorandum under condition E24 and E33(d).		
5.25	E	E25	Impacts to plant community types and species credit species must not exceed those identified in the documents listed in **Tables** in **SCHEDULE 1** and **SCHEDULE 2** of **APPENDIX C** and the corresponding number and class of ecosystem and species credits as set out in the BAM Biodiversity Credit Report which forms part of **Condition A1(c).**	The clearing and grubbing works for Dirnaseer Road to Dudauman Lane commenced on 27 November 2025: I2S Vegetation Clearing Tracker prsented, showing cumulative clearing data for the March 2026 period. Includes tracker and Impact Limits (BMP) – different PCT areas allowed for clearing. Proportion % for clearance for TECs and overall species. Aligned to the PCT limits contained in the BMP. Column for unverified m2. Column for m2 cleared (actual) – pending post-clearance report – upcoming with ecologist (Ozark). Propeller used for GIS	**Opportunity for Improvement** **I2S-02_OFI-05:** The register for vegetation clearing which included the % proportion tracked was showing incorrect calculations. Additionally, the Fauna Capture Register stated NOT RELEASED under the date released column. The registers should be reviewed and updated	Compliant

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				mapping – update for remaining vegetation; will then recalculate polygons. Tracker will then be updated. Column F – HBT Cr Column G – No HBT Cr Column H – Total m2 to be cleared Appx 1, Schedule 2 in SSI – credit amounts: these have been updated based on the unsurveyed lands report (as per schedule 3 in SSI).	to reflect accurate information and for traceability purposes.	
5.26	E	E26	Prior to impacts on the biodiversity values of the CSSI, the number and classes of ecosystem credits and species credits (like-for-like) as set out in the BAM Biodiversity Credit Report which forms part of the **Condition A1(c)**, must be retired. The number and classes of ecosystem credits and species credits that must be retired (prior to impacting the biodiversity values) are detailed in **SCHEDULE 1** and **SCHEDULE 2** of **APPENDIX C.** The Proponent may review and reduce the ecosystem and species credit requirements in Tables in **SCHEDULE 1** and **SCHEDULE 2** of **APPENDIX C** to reflect the final construction footprint; the further surveys required by **Condition E31**; and the 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 BCS and DECCEW(Cth) and	Credit Retire Reports were reviewed as compliant during initial audit. This condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			documented in a report prepared in accordance the Biodiversity Assessment Method and accompanied by an updated Credit Report. The report and the updated Credit Report must be submitted to the Planning Secretary for approval prior to the retirement of credits.			
5.27	E	E27	On the discovery of potential or actual impacts to any threatened communities or species not listed in **SCHEDULE 1** or **SCHEDULE 2** of **APPENDIX C**, all work which may impact the identified species or community must stop to prevent further impact and the Planning Secretary and BCS (and DCCEEW(Cth) where relevant) notified in writing. Work must not recommence until the relevant agencies have been consulted and any required management plans or approvals have been obtained. This condition does not permit additional impacts to Threatened Species and Threatened Ecological Communities that were not assessed as part of the CSSI.	No potential or actual impacts were identified on threatened ecological communities or species which is not listed under Schedule 1 or Schedule 2 as confirmed by JHG during the audit interview.		Not Triggered
5.28	E	E28	The retirement of the credits must be carried out in accordance with the *Biodiversity Conservation Act 2016* (BC Act), and can be achieved by: (a) acquiring and retiring "biodiversity credits" within the meaning of the BC Act; and / or (b) making a payment into the Biodiversity Conservation Fund of an amount equivalent to the class and number of ecosystem and species credits, as calculated by the	Credit Retire Reports were reviewed as compliant during initial audit. This condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Biodiversity Conservation Fund (BCF) Charge System; and/or (c) funding a biodiversity conservation action that benefits the entity impacted and is listed in the ancillary rules of the Biodiversity Offset Scheme. ***Note:** "Impacted site" in the application of the like-for-like offset rules is taken to be the subject land described in the Biodiversity Development Assessment Report referred to in **Condition A1**. The subject land is the disturbance footprint subject to assessment under the Biodiversity Assessment Method.*			
5.29	E	E29	Evidence of the retirement of credits in satisfaction of Condition **E28** must be provided to the Planning Secretary prior to impacts to the biodiversity values occurring.	Credit Retire Reports were reviewed as compliant during initial audit. This condition is no longer triggered.		Not Triggered
5.30	E	E30	Where evidence of compliance with the *Ancillary rules: Reasonable steps to seek like-for-like biodiversity credits for the purpose of applying the variation rules* has been provided to, and approved by the Planning Secretary, the variation rules may be applied to retire the relevant ecosystem credits and species credits as set out in the BAM Biodiversity Credit Report (Variation). The variation rule does not apply to biodiversity credits for threatened species or threatened ecological communities that are listed as critically endangered under the *Biodiversity Conservation Act 2016* or listed in any capacity under the *Environment Protection and Biodiversity Conservation Act 1999*.	JHG confirmed during the audit interview that variation rules are not applicable for this project.		Not Triggered

<table>
<tr><th>ID No.</th><th>CSSI Part</th><th>Req. No.</th><th>SSI-9406 Requirement</th><th>Audit Evidence</th><th>Audit Findings / Recommendations</th><th>Compliance Rating</th></tr>
<tr><td>5.31</td><td>E</td><td>E31</td><td>Unsurveyed Areas
Biodiversity surveys of unsurveyed land identified in SCHEDULE 3 of APPENDIX C must be completed to confirm the CSSI will not result in a greater impact than Condition E32. The surveys must be completed by an accredited assessor in accordance with the Biodiversity Assessment Method prior to retiring credits in accordance with Condition E27 for the unsurveyed areas.</td><td>Assessment of Unsurveyed Area Report Rev. 2 prepared by WSP, dated 28/7/2025, was reviewed during the previous audit. All un-surveyed lands have now been surveyed. No survey undertaken in this audit period.</td><td></td><td>Not Triggered</td></tr>
<tr><td>5.32</td><td>E</td><td>E32</td><td>The CSSI must not result in an impact on Threatened Ecological Communities and/or threatened flora species within the unsurveyed lands identified in SCHEDULE 3 of APPENDIX C that is greater than that indicated in Table 4.
Table 4: Threatened Ecological Communities and threatened species assumed present within unsurveyed lands
<table>
<tr><th>PCT/species name</th><th>BC Act status</th><th>EPBCA</th><th>SAII</th><th>Area / No. Individuals[1]</th></tr>
<tr><td>Inland Grey Box Woodland in the Riverina, NSW South Western Slopes, Cobar Peneplain, Nandewar and Brigalow Belt South Bioregions
PCT 76, PCT 80</td><td>Endangered</td><td>Endangered</td><td>No</td><td>10.35</td></tr>
<tr><td>White Box Yellow Box Blakely's Red Gum Woodland</td><td>Critically Endangered</td><td>Critically Endangered</td><td>SAII</td><td>8.37</td></tr>
</table></td><td>As per assessment of Unsurveyed Area Report Rev. 2 prepared by WSP, dated 28/7/2025 presented as evidence. For the unsurveyed land, impacts did not appear to exceed those outlined in the referenced table.</td><td></td><td>Compliant</td></tr>
</table>

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(nested table below)			

PCT 266, PCT 276, PCT 277, PCT 347				
Acacia ausfeldii / Ausfeld's Wattle	Vulnerable	-	No	4.3
Ammobium craspedioides / Yass Daisy	Vulnerable	Vulnerable	No	15,477*
Austrostipa wakoolica / A spear-grass	Endangered	Endangered	No	4.88
Caladenia arenaria / Sand-hill Spider Orchid	Endangered	Endangered	SAII	4.41
Caladenia concolor / Crimson Spider Orchid	Endangered	Vulnerable	SAII	0.14
Cullen parvum / Small Scurf-pea	Endangered	Not Listed	No	8.56
Diuris tricolor / Pine Donkey Orchid	Vulnerable	Not Listed	No	5.02
Eleocharis obicis / Spike-Rush	Vulnerable	Vulnerable	No	4.41
Euphrasia arguta / Euphrasia arguta	Critically Endangered	Critically Endangered	SAII	2.3
Grevillea wilkinsonii / Tumut Grevillea	Critically Endangered	Endangered	SAII	2.3
Indigofera efoliata / Leafless Indigo	Endangered	Endangered	SAII	4.41
Lepidium aschersonii / Spiny Peppercress	Vulnerable	Vulnerable	No	4.41

<table>
<tr><th>ID No.</th><th>CSSI Part</th><th>Req. No.</th><th>SSI-9406 Requirement</th><th>Audit Evidence</th><th>Audit Findings / Recommendations</th><th>Compliance Rating</th></tr>
<tr><td></td><td></td><td></td><td>
<table>
<tr><td><i>Leucochrysum albicans subsp. tricolor</i> / Hoary Sunray</td><td>Endangered</td><td>Endangered</td><td>No</td><td>14,532*</td></tr>
<tr><td><i>Prasophyllum petilum</i> / Tarengo Leek Orchid</td><td>Endangered</td><td>Endangered</td><td>No</td><td>2.96</td></tr>
<tr><td><i>Prasophyllum sp. Wybong</i> / Prasophyllum sp. Wybong</td><td>Not Listed</td><td>Critically Endangered</td><td>SAII</td><td>2.3</td></tr>
<tr><td><i>Pultenaea humilis</i> / Dwarf Bush-pea</td><td>Vulnerable</td><td>Not Listed</td><td>No</td><td>0.14</td></tr>
<tr><td><i>Senecio garlandii</i> / Woolly Ragwort</td><td>Vulnerable</td><td>Not Listed</td><td>No</td><td>0.14</td></tr>
<tr><td><i>Swainsona murrayana</i> / Slender Darling Pea</td><td>Vulnerable</td><td>Vulnerable</td><td>No</td><td>4.88</td></tr>
<tr><td><i>Swainsona recta</i> / Small Purple-pea</td><td>Endangered</td><td>Endangered</td><td>No</td><td>9.05</td></tr>
<tr><td><i>Swainsona sericea</i> / Silky Swainson-pea</td><td>Vulnerable</td><td>Not Listed</td><td>No</td><td>4.41</td></tr>
<tr><td><i>Tylophora linearis</i> / Tylophora linearis</td><td>Vulnerable</td><td>Endangered</td><td>No</td><td>0.14</td></tr>
</table>
[1] number of individuals identified with *</td><td></td><td></td><td></td></tr>
<tr><td>5.33</td><td>E</td><td>E33</td><td>A report confirming the biodiversity impacts within unsurveyed land identified in SCHEDULE 3 of APPENDIX C must be prepared in consultation with BCS and submitted to the Planning Secretary for approval prior to Work that would impact biodiversity values occurring in the unsurveyed areas identified in SCHEDULE 3 of APPENDIX C. The</td><td>Assessment of Unsurveyed Area Report Rev. 2 prepare by WSP, dated 28/7/2025 as presented. Consultation records included under section 2.7 ‘Consultation’. The report was submitted to DPHI on 11 August 2025. Sighted approval letter from DPHI, dated 20 August 2025, confirming</td><td></td><td>Compliant</td></tr>
</table>

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Confirmation of Biodiversity Impacts of Unsurveyed Land Report must include: (a) details of the surveys completed in accordance with **Condition E31**; (b) the location of biodiversity to be impacted; (c) confirmation that impacts to the threatened ecological communities and threatened species impacted are the same or less than that permitted by **Condition E32**; (d) demonstration of how detailed design and refinement of areas of impact has resulted in minimising impacts to threatened ecological communities and threatened species including maps identifying changes to areas of impact; and (e) any reduction in the type and/or credit requirements as a result of this report. ***Note****: This condition does not preclude combining the requirements of* ***Condition E24*** *and the confirmation of biodiversity impacts of unsurveyed land into one report, where the requirements of both conditions are met.*	the compliance with E33 (a, b, c and e). DPHI advised to submit the second report to comply with E33 (d). Sighted Memorandum by JHG, dated 18 November 2025, confirming the compliance with E24 and E33(d). Sighted DPHI approval letter ref. SSI-9406-PA-54, dated 1 December 2025, confirming the approval of memorandum under condition E24 and E33(d).		
5.34	E	E34	**Additional Box Gum Woodland Measures** Within 12 months of the date of this approval, the Proponent must apply for, and, if approved, enter into a Biodiversity Stewardship Agreement (BSA) to ensure ongoing management and active restoration of 45.7ha hectares of Box Gum Woodland within a 123.15 hectare restoration site	Sighted DPHI Letter ref. SSI-9406-PA-69, dated 20 January 2026, confirming the extension until 31 March 2026 for the timeframe to apply for a Biodiversity Stewardship Agreement (BSA) as required under condition E34.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			of a portion of Lot 3 DP 591854 as outlined in documents listed in **Condition A1(e)** and **A1(f)**. The management and restoration actions are additional to credit obligations required by **Condition E26**.	Sighted email from Assurance & Biodiversity Stewardship Branch, dated 23 January 2026, stating that the "*BSA application has now entered the queue to commence spatial and eligibility review. As such, the commencement email below should suffice, and you can notify DPHI of compliance*". Sighted BSA submission to DPHI ref. SSI-9406-PA-72, dated 29 January 2026. Sighted post approval receipt SSI-9406-PA-72, dated 29 January 2026.		
5.35	E	E35	A **Box Gum Woodland Restoration Plan** must be prepared by an ecologist with appropriate qualifications and experience in Box Gum Woodland restoration determined in consultation with BCS for the management of the restoration site identified in **Condition A1(e)** and **A1(f)** to ensure: (a) in perpetuity management of existing Box Gum Woodland (b) increase in the extent of Box Gum Woodland and (c) improve connectivity within and across the site identified in **Condition E34**. The **Box Gum Woodland Restoration Plan** must be submitted to and approved by the Planning Secretary prior to the commencement of construction. The **Box Gum Woodland Restoration Plan** must be implemented and	Box Gum Restoration Plan Rev. 2, dated 13 October 2025, was prepared by WSP as presented as evidence. The qualification and experience of ecologist is included under section 1.4 'Personnel'. Sighted approval letter from DPHI, dated 17 October 2025, confirming the compliance with condition E35.	**Non-Compliance I2S-02_NC-04:** The Box Gum Woodland Restoration Plan was not uploaded on the website as required by Condition E35, therefore triggering a non-compliance. It is recommended that upload occur without delay to be fully	Non-Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			made publicly accessible.		compliant with Condition E35. This was rectified promptly, with the Plan subsequently uploaded to the website as evidenced during the closing meeting. This non-compliance is now considered closed.	
5.36	E	E36	The Box Gum Woodland Restoration Plan must include: (a) site map identifying the site boundary, existing vegetation to be maintained, areas to be actively restored and connectivity or movement corridors to be established or maintained; (b) active restoration and maintenance activities, including seed collection, fire management, threatened species habitat management, feral pest and weed management; (c) proposed restoration and connectivity targets; (d) timeframes and responsibilities for meeting targets, including all actions to be completed prior to entering into a Biodiversity Stewardship Agreement; (e) monitoring plan;	Box Gum Restoration Plan Rev. 2, dated 13 October 2025, was reviewed as part of this audit. Compliance with this condition addressed as follows: (a) as per figure 1.1 'Site Map' and figure 1.2 'Management Zones' (b) as per section 2.4 'Box Gum Woodland ARMA' and Appendix A 'Management Plan' (c) as per section 3 'Monitoring and Adaptive Management' and Appendix A 'Management Plan' (d) as per section 3 'Monitoring and Adaptive Management' and Appendix A 'Management Plan' (e) as per section 3 'Monitoring and Adaptive Management' and Appendix A 'Management Plan'		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(f) adaptive management program to assess the effectiveness of the restoration and maintenance activities in meeting the targets identified in (c), and (g) a process to ensure adaptive management measures, if targets are not met. ***Note**: The Box Gum Woodland Restoration Plan is not intended to replace or duplicate the requirements for the management of the site in accordance with a Biodiversity Stewardship Agreement. This condition does not preclude utilising documents or data from the BSA from being included in the Box Gum Woodland Restoration Report.*	(f) as per section 3 'Monitoring and Adaptive Management' and Appendix A 'Management Plan' (g) as per section 3 'Monitoring and Adaptive Management' and Appendix A 'Management Plan'		
5.37	E	E37	A **Box Gum Woodland Restoration Report** must be prepared by an ecologist with appropriate qualifications and experience in Box Gum Woodland restoration determined in consultation with BCS, every 12 months unless otherwise agreed by the Planning Secretary and made publicly available. The **Box Gum Woodland Restoration Report** must include: (a) active restoration and maintenance activities completed in the previous 12 months; (b) monitoring results; (c) performance against restoration and connectivity targets; and (d) adaptive management measures implemented in the event that targets are not being met.	The timing of this condition is not yet triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			The **Box Gum Woodland Restoration Report** must be finalised within 2 months of each 12- month period. The Report must also be provided to the Planning Secretary and **BCS** on request. ***Note:*** *This condition does not preclude utilising documents or data from the BSA from being included in the Box Gum Woodland Restoration Report.*			
5.38	E	E38	**Riparian Vegetation** Riparian land disturbed during construction must be rehabilitated and revegetated with native species of local provenance from the relevant plant community type on completion of Work impacting the riparian land in accordance with the *Guidelines for controlled activities on waterfront land – Riparian corridors* (NRAR, 2018).	Sighted email correspondence to CPHR, dated 11 March 2026, confirming that felled timber components will be repurposed as fauna furniture within bridges and creek crossings. Sighted email to DPI Fisheries, dated 26 March 2026, regarding consultation for the installation of fauna furniture beneath bridges and within/along creek banks. Sighted response from DPI Fisheries, dated 2 April 2026, providing guidance on the installation process for snags and associated habitat considerations. Rehabilitation and revegetation activities have not yet commenced.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.39	E	E39	**Seed Collection, Revegetation and Rehabilitation** Seed from native plants to be removed must be collected before clearing and used in revegetation, restoration and rehabilitation across the project area and the site identified in Condition E34. Plant propagation must ensure that native species of local provenance from the relevant native vegetation community are available for successful revegetation and landscaping.	Sighted short form subcontract (no. 7688-065) with Fontenoy AG & Earth Pty Ltd for the seed collection. Fontenoy remains engaged for these activities, with seed collection undertaken ahead of vegetation clearing. Collected materials are intended to be reused within creek crossings and along creek banks, supporting habitat connectivity and seed distribution. Local landholders have also expressed interest in utilising the collected seed. Sighted seed collection form, collection no. 201, dated 11 December 2025. Sighted photo evidence of collected seeds on JHG SharePoint folder.		Compliant
5.40	E	E40	**Fauna Connectivity** **Fauna Crossings - Baseline Monitoring** Baseline monitoring of existing fauna movement corridors, pathways and connectivity within the Assessment Area as defined in the Biodiversity Assessment Development Report must be undertaken in accordance with a Baseline Monitoring Program prepared by a suitably qualified and	Baseline Bird Monitoring Report Rev. 1, document no. 2-0001-220-ESV-00-RP-0010, dated 25/02/2026, prepared by WSP as sighted. Squirrel Glider Baseline Surveys Rev. B, dated 29 July 2025, prepared by WSP also presented as evidence.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			experienced expert in consultation with BCS. The Baseline Monitoring Program must: (a) be adequate for determining existing fauna movement corridors, pathways and connectivity for: (i) Brown Treecreeper; (ii) Diamond Firetail; (iii) Flame Robin; (iv) Grey-Crowned Babbler; (v) Rainbow Bee-eater; (vi) Scarlet Robin; (vii) Speckled Warbler; (viii) Superb Parrot; (ix) Varied Sittella; (x) White-fronted Chat; and (xi) Squirrel Glider; and (b) consider the broader landscape connectivity, pathways and movement corridors; and (c) consider relevant State and Commonwealth threatened species guidelines, species biology and the results of on-ground surveys in determining the length of time and time of year for baseline monitoring.	(a) Targeted monitoring of the specified bird species (i-x) (Table 1.1 of Bird Monitoring Report) and Squirrel Glider is undertaken using census and movement surveys (Squirrel Glider Sections 1.2 and 2.2). (b) As per Bird Monitoring Report Sections 2.2.2 and 2.4.2; Squirrel Glider Section 2.1 (c) As per Bird Monitoring Report Section 2.1.2; Squirrel Glider Sections 1.2 and 2.1		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.41	E	E41	The design of the fauna connectivity measures must have regard to: (a) baseline monitoring completed in accordance with Condition E40; (b) fauna habitat/fauna furniture and refuges within and near the CSSI to facilitate fauna movement for all native species (threatened and non-threatened) that will potentially use the connectivity structures; (c) relevant State and Commonwealth threatened species guidelines, species biology and the results of on-ground surveys; (d) Fauna Sensitive Road Design Manual Volume 2 (Queensland Government, 2010); (e) Fauna Sensitive Road Design Guidelines (VicRoads, 2012); and (f) industry best practice measures.	Sighted Revised Draft Connectivity Strategy Rev. G, document no. 5-0000-220-PMA-00-PL-0000, dated 25 February 2026. The strategy is in draft form. A draft was provided to CPHR and DPI Fisheries, with JHG noting that the strategy will progress in alignment with the civil design, including consideration of the number of structures and achieving the best ecological outcomes. IRPL confirmed during the audit interview that an on-site meeting was held with both parties on 18 March 2026. A program outlining the anticipated submission timeframe for upcoming strategy components was issued to DPHI, with a target completion of September 2026. A letter was submitted to DPHI in February 2026; however, it was rejected on 2 April 2026. Following Easter, IRPL submitted a further non-compliance notification and request for an extension of time, linked to Conditions A9 and E44. A Request for Information from DPHI is expected. Refer to condition E44 for more details.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.42	E	E42	**Watercourse Crossings** Watercourse crossings must be designed in consultation with DPI Fisheries and in accordance with *Why do fish need to cross the road? Fish passage requirements for waterway crossings* (Fairfull & Witheridge, 2003).	Consultation records with DPI Fisheries were presented. Sighted email from DPI Fisheries, dated 30 September 2025, endorsing the detailed temporary waterway crossing designs received on 15 September 2025, as evidenced during initial audit. IRPL and JHG confirmed during the audit interview that there have been no changes in this audit period.		Not Triggered
5.43	E	E43	Fauna access pathways to connectivity measures must: (a) not be impeded by crossing loops, ancillary facilities, service roads and tracks, level crossings and roads; and (b) use local native flora species in approaches to connectivity structures.	Sighted Billabong Isobel Creek drawing 5-0019-220-SBD-H6-DR-006.DWG, Rev. 0, dated 12 September 2025. Connectivity measures included within area of environmental concerns and it will be linked to Final Fauna Connectivity Strategy. This was reviewed during initial audit. No changes in this audit period.		Not Triggered
5.44	E	E44	**Connectivity Strategy** The *draft Connectivity Strategy* listed in Condition A1 must be finalised by a suitably qualified and experienced ecologist(s) with experience in fauna connectivity, fauna crossings and experimental design. The final Connectivity Strategy must be prepared in consultation with BCS and DPI	Sighted Revised Draft Connectivity Strategy Rev. G, document no. 5-0000-220-PMA-00-PL-0000, dated 25 February 2026. The strategy was noted to be in draft form.	**Non-Compliance I2S-02_NC-05:** The non-compliance was self-reported by IRPL to DPHI via non-compliance notification	Non-Compliant

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			Fisheries and submitted to the Planning Secretary for approval prior to construction commencing. The Connectivity Strategy must include, but not limited to: (a) details of existing fauna movement corridors, pathways and connectivity informed by baseline monitoring completed in accordance with Condition E40 and other on-ground surveys completed; (b) justification for the location and design, and spacing of the connectivity structures with reference to the requirements of Condition E41; (c) justification for not proceeding with a fauna connectivity measure outlined in Table L.3 of the *draft Connectivity Strategy* and the location and design of alternative fauna connectivity measures where the measure could not be implemented; (d) demonstration of the effectiveness of the proposed connectivity structures and measures in terms of location, design and number to mitigate impacts to the relevant threatened species, and that the design will: (i) maintain or improve connectivity and movement pathways of species within regional, local and riparian corridors; (ii) reduce the risk of mortality for threatened species; (iii) be located at sufficient frequency along the alignment, based on the ecological requirements of the targeted species, including but not limited to home range size, movement patterns, and habitat use; and (iv) consider the effects of connectivity structures on the maintenance or improvement of population viability and	Approval letter of submission timeframe extension of final Fauna Connectivity Strategy under SSI-9406-PA-47, dated 15 September 2025, was sighted, confirming the extension of submission until 9 December 2025. Sighted IRPL Extension Letter to DPHI, dated 9 December 2025, requesting the extension of final fauna connectivity strategy. Sighted DPHI letter ref. SSI-9406-PA-64, dated 11 December 2025, confirming the extension of final fauna connectivity strategy until 28 February 2026. The Fauna Connectivity Strategy (FCS) was extended to 9 December 2025 (PA-47) and further extended to 28 February 2026 (PA-64). A third extension request submitted on the 26 February 2026 was refused on 02 April 2026 citing: • *Consultation with Regional Delivery Division of DCCEEW (previously BCS) and Fisheries has not been closed out* • *Early construction activities, including clearing and fauna fencing, were to be managed*	dated 7 April 2026, relating to the timely submission of Fauna Connectivity Strategy. The submission timeframe for the final Fauna Connectivity Strategy (FCS) was extended by DPHI to 9 December 2025 (ref. SSI-9406-PA-47) and subsequently to 28 February 2026 (ref. SSI-9406-PA-64). A third extension request submitted on 26 February 2026 was refused by DPHI on 2 April 2026. The final FCS was not submitted by the 28 February 2026 deadline as required by MCoA E44, and the further extension request was not accepted by DPHI.	

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			gene flow for targeted species; (e) details and design (including a map) of all connectivity structures including: (i) flight diversion structures and (ii) fauna exclusion fencing (f) a map showing the location and design of all fauna connectivity measures to be implemented (g) the maintenance activities for all connectivity structures and measures for the life of the impact of the CSSI, including timing and frequency of maintenance actions, including after flooding events; (h) an assessment of the flooding risk for proposed structures and measures to confirm and provide for flood immunity of those structures as a result of this assessment; (i) include Operational Fauna Connectivity Monitoring, Predator Prevention and Adaptive Mitigation Program required by Condition D7.	*under the approved Biodiversity Management Sub-plan however:* *(a) There was an incident on 2 December 2026 where a superb parrot habitat tree, was felled while three fledglings were present in the hollow* *(b) During site inspections on 18 February 2026 and 19 March 2026 there was no observable demarcation of clearing limits or habitat features or signage* - *The draft FCS provided for consultation on 25 February 2026:* *(a) Remains non-committal regarding connectivity measures to be implemented, including structures, access pathways (strategic revegetation) and fencing (exclusion and funnelling)* *(b) Did not discuss whether potential connectivity measures have been*		

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				affected by clearing conducted to date (c) *Did not include the map series locating the fauna connectivity measures* (d) *Did not include the Operational Fauna Connectivity Monitoring, Predator Prevention and Adaptive Mitigation Program required by Condition D7.* A DPHI and CPHR site visit was held on 19 March 2026 and subsequent meeting on 25 March 2026 where the FCS was reviewed and discussed including inspection of the connectivity sites with the WSP representative/author of the FCS Attendees at this site visit included representatives from DPHI and CPHR where discussions included an agreement for the Project to prepare a suite of actions and timeline to outline the remaining inputs for a complete FCS draft (to the expectations of DPHI and CPHR).		

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				During the 25 March 2026 meeting it was agreed an amended A9 letter would be issued including justification for the extension, past progress and future milestones. The updated A9 letter has been submitted on 07 April 2026 (IRPL REF# 6-0000-210-EEC-00-LT-0075), requesting the timeframe to be modified to 2 September 2026. The overview of the anticipated completion date is attached with the letter. JHG and IRPL advised during the audit interview that there has been a change in DPHI expectations. Previously, DPHI required a single consolidated document at the final stage; however, they are now requesting progressive information submissions throughout the process. It was noted that the current requirement focuses on detailed design information, including specific coordinates and technical details.		
5.45	E	E45	**Fauna Funnel and Exclusion Fencing** Fauna funnel fencing and exclusion fencing must be provided to prevent fauna from accessing the rail alignment. The fencing must be installed before the commencement of operation. The fencing must be designed in accordance with	This condition will be triggered during pre-operational stage.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			best practice measures in consultation with suitably qualified experts in both fauna fencing and the target fauna species (threatened and non-threatened species) and in consideration of baseline monitoring results required by **Condition** E40. ***Note:*** *It is envisaged that different types of fauna fencing will be required in different areas depending on the requirements to exclude or funnel the target species.*			
5.46	E	E46	**Re-use of Timber** Cleared native vegetation and other landscape features must be reused as part of the CSSI, including for re-snagging of waterways, in consultation with DPI Fisheries. If reuse is not practicable, consultation with the relevant council(s), landcare groups and relevant state agencies must be undertaken to determine if: (a) hollows, tree trunks, mulch, bush rock and root balls; and (b) collected plant material, seeds and/or propagated plants; can be used by others in habitat enhancement, beneficial re-use and rehabilitation work, before pursuing other disposal options.	During the 19/03/2026 site inspection from DPHI and CPHR, the clearing limits at Isobel Creek were observed without flagging installed and pockets/individual trees at Burley Griffin Way were observed to be surrounded by orange flagging. During the 18/02/2026 site inspection, JHG outlined that mulching had commenced for materials not suitable for reuse to enable the mulch to be used for ERSED controls on-site. Concerns were raised by the DPHI and CPHR regarding the quantity of mulch and if other re-use options had been investigated prior to the mulching such as the BSA site. At the time of the 18/02/2026 site inspection, IRPL had not informed JHG that reuse of wooded debris could be considered, nor that access was possible	Refer to Self-Reported Non-Compliance I2S-02_NC-01 under condition C20.	Compliant

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				for placement of the wooded debris prior to the sign off of the BSA. It is noted initial discussions were held with DPI fisheries in March 2025. Sighted email to DPI Fisheries, dated 25 February 2025. These discussions included an agenda raised by JHG staff to discuss matters associated with CoA E41, E44 and E46. A subsequent meeting was held with Fisheries where opportunities to provide rootballs for re-use offsite as part of DPI Fisheries Projects in the Southwest Slopes and Riverina regions was discussed. Further discussions have taken place with DPHI providing details of preferred installation, habitat and hydraulic considerations (Attachment 1). As-built designs include details of installation of fauna furniture, with JHG committing to incorporating remaining timber as prescribed by DPI Fisheries. The details provided are also being incorporated into the next revision of the FCS. During the audit interview, JHG and IRPL advised that the matter was only partially considered a non-compliance, specifically in relation to the reuse of vegetation within		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				the Biodiversity Stewardship Agreement (BSA). It was noted that early access had been sought to utilise the BSA area; however, the BSA is managed by IRPL, not JHG. During a site visit by DPHI and CPHR on 19 March 2026, questions were raised regarding why the BSA area, located outside the project boundary, had not been considered. This subsequently led to the option being pursued. The issue itself is not considered a non-compliance; however, an non-compliance was raised in accordance with internal classification and flagging requirements. Evidence was sighted demonstrating ongoing consultation with DPI Fisheries. Initial consultation was documented in meeting minutes dated March 2025. JHG subsequently re-engaged with DPI Fisheries to confirm the suitability of cleared vegetation for reuse, including for creek bank stabilisation and rehabilitation works. An email from JHG to DPI Fisheries dated 26 March 2026 was sighted, confirming earlier enquiries regarding whether any projects required cleared vegetation. Additional consultation emails dated 26 March 2026 were also sighted.		

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				This correspondence confirms that JHG sought to ensure vegetation reuse aligned with environmental and ecological requirements, including potential use for terrestrial fauna habitat. Sighted email correspondence to CPHR, dated 11 March 2026, confirming that felled timber components will be repurposed as fauna furniture within bridges and creek crossings. Sighted email to DPI Fisheries, dated 26 March 2026, regarding consultation for the installation of fauna furniture beneath bridges and within/along creek banks. Sighted response from DPI Fisheries, dated 2 April 2026, providing guidance on the installation process for snags and associated habitat considerations. JHG confirmed during the audit interview that no cleared vegetation has been taken offsite. All material has been reused within the project, including for creek bank stabilisation and installation as fauna habitat (e.g. “fauna furniture”) at watercourse crossings. The BMP is currently under review by the ER and will		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				be submitted to DPHI following this review. Evidence of toolbox talks, dated 23 April 2026, was sighted, confirming that environmental controls and installation methodologies have been communicated to the workforce. Timber hollows were observed temporarily placed outside the fence line and are scheduled to be relocated to designated locations within the BSA boundary. JHG advised that these measures are intended to enhance biodiversity outcomes while also contributing to erosion minimisation. In addition, a Box Gum Woodland Restoration Plan has been developed, and a BSA application for stewardship has been lodged. Supporting documentation, including information relating to the Threatened Ecological Communities (TEC), is currently under government review. Subject to approval, works will be implemented under the BSA framework. These activities are linked to Conditions E34 and E35, with implementation to be undertaken in accordance with the approved restoration plan and BSA requirements.		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
FLOODING						
5.47	E	E47	All practicable measures must be implemented to ensure the design, construction and operation of the CSSI will not adversely affect flood behaviour, or adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses.	Sighted Flood Design Verification Report (FDVR) Rev. C, document no. 6-0019-220-IHY-00-RP-0002, dated 20 February 2026 – issued for review. The FDVR was noted to be still in draft form. Ongoing discussions with DPHI through weekly meetings regarding the FDVR and Erosion Threshold Velocities (ETV) Report. Sighted correspondence dated 24 April 2026 from IRPL to DPHI, providing responses to DPHI's feedback on the ETV Report. Sighted calendar invitation for a Hydrologist High-Level Meeting with DPHI scheduled at 10:30 AM on 24 April 2026.		Not Triggered
5.48	E	E48	**Flood Modelling** The hydraulic and hydrological flood modelling undertaken during the design of the CSSI and the assessment of its flood impacts must be undertaken consistent with the Flood Modelling Specifications listed in **APPENDIX B SCHEDULE 2**. In addition the modelling must be to a standard equal to or better than that in the RtS referenced in **Condition A1**. In the event of any inconsistency between the flood modelling in	Sighted Flood Design Verification Report Rev. C, document no. 6-0019-220-IHY-00-RP-0002, dated 20 February 2026 – issued for review. The FDVR is still in draft form. Sighted Technical Memorandum, dated 16 February 2026, prepared by KBR was provided. The memo states that *"No*		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			the RtS and the Flooding Modelling Specifications listed in **APPENDIX B SCHEDULE 2**, the Flood Modelling Specifications prevail.	*hydrological model developed during the detailed design phase of the project (I2S). All hydrological information has been fully adopted from the refence design by the originator design team (BG&E, 2025) without any modification and deviation from reference design. Hence, it has not been reviewed”*. The FDVR is not yet finalised; therefore, this condition is not yet triggered.		
5.49	E	E49	**Independent Peer Review of Hydraulic and Hydrological Modelling** Hydraulic and hydrological flood modelling completed in accordance with **Condition E48** and **APPENDIX B SCHEDULE 2** must be independently peer reviewed.	Sighted approval letter from DPHI, dated 18 July 2025, approving the appointment of hydrologist Bahman Esfandiar for the peer review of Hydraulic and Hydrological Modelling. Sighted Technical Memorandum, dated 16 February 2026, prepared by KBR was provided. The memo states that *“No hydrological model developed during the detailed design phase of the project (I2S). All hydrological information has been fully adopted from the refence design by the originator design team (BG&E, 2025) without any modification and deviation from*		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				reference design. Hence, it has not been reviewed”. The FDVR is not yet finalised; therefore, this condition is not yet triggered.		
5.50	E	E50	The peer review required by **Condition E49** must be undertaken 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) that prepared the flood model for the documents listed in **Condition A1**, and be approved by the Planning Secretary, 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).	Sighted approval letter from DPHI, dated 18 July 2025, approving the appointment of hydrologist Bahman Esfandiar for the peer review of Hydraulic and Hydrological Modelling.		Compliant
5.51	E	E51	The peer reviewer must verify whether the flood model and the modelled final CSSI design complies with **Condition E48** and **APPENDIX B SCHEDULE 2.** The peer review must include undertaking the following tasks: (a) comprehensively review the flood model files; (b) assess the establishment, calibration, validation and operation of the flood model including the identification of any modelling results classified as model noise;	Sighted Technical Memorandum, dated 26 February 2026, prepared by KBR was provided, confirming the compliance with condition E51. The FDVR is not yet finalised; therefore, this condition is not yet triggered.		Not Triggered

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			(c) identify and document existing and future purposes for which the model can and cannot be used, including adaptation of this model by others, and any limitations on this; (d) document the review findings and provide written confirmation that the review report is consistent with the requirements of this condition and accurately determines the flood related aspects of the design and compliance by **Condition** E55; (e) review the monitoring methodologies required by **Condition** E72. ***Note:*** *The review of the monitoring methodologies required by (e) above can be completed separately.*			
5.52	E	E52	The peer reviewer must prepare a report that details the activities undertaken during the peer review and its findings. Where the review identifies deficiencies or non-compliances within the flood model or the CSSI design, these are to be rectified prior to finalisation of the model, the CSSI design and/or the **Flood Design Verification Report**.	Sighted Technical Memorandum, dated 26 February 2026, prepared by KBR was provided, confirming the compliance with condition E52. The FDVR is not yet finalised; therefore, this condition is not yet triggered.		Not Triggered
5.53	E	E53	The peer reviewer's report must be appended to the **Flood Design Verification Report** prior to seeking agency comment and the Planning Secretary's approval required in **Condition** E66. ***Notes:***	Sighted Flood Design Verification Report Rev. C, document no. 6-0019-220-IHY-00-RP-0002, dated 20 February 2026 – issued for review. Peer Review Report (Technical Memorandum) prepared by KBR, dated 26		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			1. *The independent peer reviewer must have extensive experience with the software packages applied in the modelling for the PIR and the Flood Design Verification Report, although this may not necessarily include the specific software version(s) used in the PIR and Flood Design Verification Report, provided the software version updates are not relevant to the peer review.* 2. *An interim version/s of the peer review may be conducted consistent with the processes in* ***Condition E67.***	February 2026, is included under appendix A. The FDVR is not yet finalised; therefore, this condition is not yet triggered.		
5.54	E	E54	**Impacts on Flood Behaviour** The CSSI must be designed with the objective to meet or improve upon the flood performance identified in the RtS referenced in **Condition A1**. Variation consistent with the requirements of this approval at the rail corridor is permitted to effect minor changes to the RtS design with the intent of improving the flood performance of the CSSI.	There has been changes to RtS design – refer to exceedances of QDL's – this will be triggered upon finalisation of FDVR. IRPL advised during the audit interview that the design changes are in process and currently in consultation phase.		Not Triggered
5.55	E	E55	The CSSI must be designed and constructed so changes in the flood behaviour will not exceed the Quantitative Design Limits (QDLs) listed in **APPENDIX BSCHEDULE 1,** as assessed in accordance with the flood modelling specifications in **APPENDIX B SCHEDULE 2**, except as provided in **Condition E58** below.	The FDVR is not yet finalised; therefore, this condition is not yet triggered.		Not Triggered
5.56	E	E56	The requirements of **Conditions E54** and **E55** apply in any and all of the following circumstances: (a) on land located: (i) beyond the rail corridor; and	The FDVR is not yet finalised; therefore, this condition is not yet triggered.		Not Triggered

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			(ii) on any public road within the rail corridor; (b) during any flood event up to and including the 1% AEP event as described in the RtS; and (c) in any storm duration.			
5.57	E	E57	If the CSSI does not meet the requirements of **Condition E55** in relation to resultant velocity that exceeds the erosion threshold velocity (**ETV**), the Proponent must prepare and implement the **Operational Erosion Mitigation and Management Program** required by **Condition E68**.	The FDVR is not yet finalised; therefore, this condition is not yet triggered.		Not Triggered
5.58	E	E58	If it is not practical to modify the design of the CSSI to meet the requirements of **Condition E55**, the Proponent must, in instances of non-compliance with **Condition E55**: (a) document the extent of the non-compliance and the impact to all landowners (public and private) and environment including biodiversity and soil stability; and (b) justify why it is not practical to achieve compliance through CSSI design changes including provision of details of design options investigated to achieve compliance; and (c) consult with and obtain the written agreement of the roads authority (where relevant); and (d) consult with and provide full disclosure of likely impacts resulting from non-compliance with the QDL and obtain the written agreement of the affected landowner to the non- compliance. Such an agreement may involve works, measures,	The FDVR is not yet finalised; therefore, this condition is not yet triggered.		Not Triggered

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			maintenance activities, acquisitions, or other commitments by the Proponent to the landowner. All written agreements must be legally binding and meet any requirements of relevant legislation. ***Notes:*** 1. *Nothing in this condition prevents the use of mediation in accordance with the **Communication Strategy** required by **Condition B2**.* 2. *Nothing in this approval prevents tasks or actions completed in compliance with the conditions of approval occurring concurrently, where this does not result in a non-compliance with the approval.*			
5.59	E	E59	The Proponent must prepare a **Flood Design Consultation Protocol**, to outline the steps that the Proponent will take where there are non-compliances with the QDLs, in accordance with **Condition E58**, to consult with landowners, road authorities, and TfNSW. The Flood Design Consultation Protocol must include: (a) when non-compliances will be notified to the landowner or roads authority; (b) time provided to the landowner and roads authority to consider the non-compliance; (c) process for seeking agreement to the non-compliance and any associated works, measures, maintenance activities, acquisitions, or other commitments by the Proponent to the landowner; and (d) the process for mediation and resolution of disputes outlined in the Communications Strategy required by **Condition B2**.	Sighted Flood Design Consultation Protocol Rev. 1 document no. 5-0019-220-PMA-00-PO-0001, dated 14 November 2025. Compliance with the condition demonstrated as below: (a) as per section 4 ‘Consultation Approach’ (b) as per section 4 ‘Consultation Approach’ (c) as per section 4 ‘Consultation Approach’ (d) as per section 4 ‘Consultation Approach’		Compliant

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			The Flood Design Consultation Protocol must be prepared prior to construction and made publicly available in accordance with **Condition B18**.	The Flood Design Consultation Protocol was verified as available on the project website.		
5.60	E	E60	**Determination of Erosion Threshold Velocities (ETVs)** Should the Proponent seek to replace the default Erosion Threshold Velocity (**ETV**) of 0.5m/s (refer Velocity QDL in **APPENDIX B SCHEDULE 1**) with a site-specific ETV then an **Erosion Threshold Velocities Report** must be prepared by a suitably qualified geomorphologist or scour/erosion specialist with experience in calculating the erosion threshold velocities of erosive floodplain soils in Eastern Australia.	IRPL advised during the audit interview that the project is not proposing to replace the default ETVs. Part of ongoing discussions and modelling are as per Condition E61.		Not Triggered
5.61	E	E61	The Erosion Threshold Velocities Report must: (a) determine ETVs for every location for which site-specific ETVs are sought; (b) be based on literature and guidelines relevant to the project’s location; (c) utilise determination methods that measure the ETVs directly within a hydraulic flume (**Direct Method**) to determine ETVs for a range of sites within the Project that are representative of all sites within the Project; (d) if necessary, utilise soil classifications to infer ETVs (**Indirect Method**) from the ETVs determined using the Direct Method; (e) assume worst case ground vegetation conditions, which for the majority of locations will be bare soil conditions;	Sighted Erosion Threshold Velocity Report prepared by Landloch, Rev. 2, document no. 5-0019-220-PEN-00-RP-0024, dated 12 April 2026. The ETV Report was noted to be in draft and under discussion with DPHI. Ongoing engagement with DPHI through weekly meetings regarding the Flood and Drainage Verification Report (FDVR) and Environmental Technical Verification Report (ETVR). The ETVR (Revision A) was originally submitted in November 2025 as part of the FDVR. Subsequently, the ETVR was		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(f) state an ETV for all sites and whether the default ETV, or a determined ETV (whether calculated or inferred from a calculated value) has been adopted; (g) document the procedures used to determine the ETVs for all sites; and (h) justify procedures used to determine the sites chosen for ETV determination using the Direct Method and the Indirect Method.	issued separately to DPHI for review. Once approved by DPHI, the ETVR will be incorporated into the FDVR. Sighted RFI Comment Sheet “SSI-9406-PA-52 ETV Report RFI-104848474_260216”, confirming that John Holland provided responses to RFIs issued by DPHI. The first RFI was issued on 22 October 2025 and responded to on 16 December 2025. The second RFI was issued on 30 January 2026 and responded to by John Holland on 16 February 2026. A DPHI site visit occurred in February 2026, during which an escalation process was initiated. Following this, an extension of time was requested, with submission due by 8 May 2026. Sighted email from IRPL to DPHI, dated 8 April 2026, providing the comments on figure A06 of ETVR. Additionally, sighted email dated 24 April 2026 from IRPL to DPHI, providing responses to DPHI’s RFI feedback.		

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				Sighted calendar invitation for a Hydrologist High-Level Meeting with DPHI held at 10:30 AM on 24 April 2026. The ETVR is not yet finalised; therefore, this condition is not yet triggered.		
5.62	E	E62	The methodology/ies used to determine the ETVs must be submitted to and approved by the Planning Secretary in advance of submitting the **Erosion Threshold Velocities Report** required by **Condition E60** for the Planning Secretary's approval.	Following methodologies for ETVs has been prepared and submitted to DPHI as verified during the initial audit: • Methods For Erosion Threshold Velocity (ETV) – Method 1, Rev. A, dated 1/05/2025. • Methods For Erosion Threshold Velocity (ETV) – Method 2, Rev. A, dated 1/05/2025. These methodologies were submitted and administratively closed out; however, they are considered no longer applicable due to progression beyond the proposed methodology framework as advised by IRPL. The matter remains under discussion between the IRPL Programs Team and DPHI. The methodologies are not currently triggered. Applicability is limited to the indirect methodology approach, whereas the direct methodology is currently being applied. Based on available records, DPHI		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				has not provided formal approval or endorsement of the ETV methodologies. Sighted email correspondence dated 12 December 2025 from Landloch, which confirmed that the Indirect Method is no longer relied upon in the latest ETV Report update. The email noted that all sites previously assessed using the indirect method have been reassessed using the Direct Method, which is accepted by DPHI. It also indicated that the Indirect Method is not internally endorsed, and no further updates are being progressed at this stage.		
5.63	E	E63	The Erosion Threshold Velocities Report must be developed in consultation with the Department. The Report must be submitted to and approved by the Planning Secretary prior to finalisation of any Interim Flood Design Verification Report, or the Flood Design Verification Report prepared in accordance with **Conditions E64** to **E67** (FDVR and Interim FDVR), whichever occurs earlier.	Sighted Erosion Threshold Velocity Report prepared by Landloch, Rev. 2, document no. 5-0019-220-PEN-00-RP-0024, dated 12 April 2026. The ETV Report is in draft and under discussion with DPHI. The draft report was submitted to DPHI on 15 April 2026 via email as evidenced. Ongoing discussions with DPHI through weekly meetings regarding the FDVR and ETV Report. This condition is not yet triggered.		Not Triggered

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5.64	E	E64	**Flood Design Verification Report** A **Flood Design Verification Report** (**FDVR**) must be prepared to detail flood behaviour under existing conditions and how this would change with the final detailed design of the approved CSSI. The **FDVR** must demonstrate compliance (or otherwise) with **Conditions E54** to **E58**.	Sighted Flood Design Verification Report Rev. C, document no. 6-0019-220-IHY-00-RP-0002, dated 20 February 2026 – issued for review. This report is still in draft and under review. Sighted RFI request from DPHI, dated 30 March 2026, regarding the low risk culverts. Sighted Response sheet "I2S DPHI criterial low High Risk Drainage Culverts Project Response 20260409", dated 9 April 2026. The response was submitted to DPHI on 13 April 2026.		Not Triggered
5.65	E	E65	The Flood Design Verification Report must include: (a) the CSSI design used in the preparation of the **Flood Design Verification Report**; (b) details of the hydraulic and hydrological flood modelling including: (i) the establishment, calibration, validation and operation of any computer models (including hydraulic and hydrology models); (ii) a description of all flood behaviour used in the design of the CSSI; (iii) details of the flood modelling assumptions and inputs including blockage calculations	As above – the FDVR is under review and not yet finalised. This condition is therefore not yet triggered. **E65 (d) (f) (j):** Sighted extension letter from DPHI ref. SSI-9406-PA-55, dated 11 December 2025, confirming to defer the following requirement to prior to operation phase: • written agreements with landowners until prior to operation as they relate to condition E65(d),		Not Triggered

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			and assumptions for each cross-drainage structure; (iv) demonstration that the modelling conforms with all the requirements of **APPENDIX B**; (v) a copy of the flood modelling outputs required to demonstrate compliance with **Conditions E54** to **E58**; (c) 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; (d) an assessment of compliance of the final design of the CSSI with the requirements of **Conditions E54** to **E56**, including a table of all non-compliances, and documentation of the process and outcomes required by **Conditions E57** and **E58**. Written agreements, in accordance with **Conditions E58(c)** and **E58(d)** may be provided to the Planning Secretary separate to the **FDVR**; (e) an assessment of the impacts of the final design on the Stockinbingal village and adjacent rural land (i.e. land within Stockinbingal zoned RU5 and any land directly adjacent to land zoned RU5 or separated from it by a road or railway) in the 1% plus climate change AEP event and details of the final design's capacity to mitigate these impacts; (f) all design and/or mitigation measures to address adverse impacts to existing erosion for all instances in which the CSSI:	E58(d), E65(f) and E65(j). As noted in condition E65(d) written agreements may be provided to the Planning Secretary separately. • implementation of identified mitigation measures as identified in the OEMMP as they relate to condition E70(a) until prior to operation. However, DPHI did not agree to defer the requirement for written agreements with roads authorities in accordance with conditions E65(d), E58(d), E65(f) and E65(j). Sighted Flood Impacts Deed with Cootamundra-Gundagai Regional Council, dated 12 March 2026. Sighted Flood Impacts Deed with Junee Shire Council, dated 6 March 2026.		

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			(i) exceeds the velocity QDL specified in **APPENDIX B SCHEDULE 1** and causes the resultant velocity to exceed the erosive threshold velocity; or (ii) is within an area that is actively eroding; (g) an assessment of: (i) risk to life caused by formation failure in flood events based on an evaluation of the probabilities and consequences of formation failure; (ii) aquaplaning risks where the CSSI produces additional inundation of highways or sealed roads with a speed limit of 80km/h or greater; and (iii) the impacts of the CSSI on erosion, scouring, bank stability, stream stability and geomorphology including with regard to *NRAR's Guidelines for Controlled Activities on Water Front Land* (DPE 2022); and (h) a detailed response outlining how recommendations of the independent peer review required by **Condition E49** have been incorporated into the flood modelling or justification for why recommendations have not been incorporated; (i) the Erosion Threshold Velocities Report required by **Conditions E60** to **E62**; and (j) the Operational Erosion Monitoring and Mitigation Program required by **Conditions E68**			

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			to **E70**.			
5.66	E	E66	The **Flood Design Verification Report** must be submitted to the Planning Secretary for approval at least one month prior to the commencement of construction of permanent works that may impact on flooding. Works that may impact on flooding cannot commence until the **Flood Design Verification Report** is approved by the Planning Secretary. The **Flood Design Verification Report** including the flood model and the model results must be submitted for review by BCS, DCCEEW Water, TfNSW and Councils and any comments received addressed prior to submitting the **Flood Design Verification Report** to the Planning Secretary. **Note**: Where the information included in the **FDVR** relates to that reviewed by an independent peer reviewer in accordance with **Condition E49**, the Planning Secretary will consider how any findings or recommendations made by the Independent Peer Reviewer were addressed and resolved. For the purposes of **Condition E66**, “permanent works that may impact of flooding” includes but is not limited to: any flood storage, earthen embankment, viaduct, bridge, rail formation, culverts, and drainage including longitudinal drainage.	As above – ongoing discussions with DPHI through weekly meetings regarding the FDVR. This condition is not yet triggered.		Not Triggered

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5.67	E	E67	**Interim Flood Design Verification Report** The Proponent may provide a program for review of an interim **FDVR** at defined point/s of project design development by the Planning Secretary, in consultation with BCS, DCCEEW Water, TfNSW and Councils. The program must be submitted to the Planning Secretary at least one month before the date an Interim **FDVR** would be submitted. This program must: (a) define the points at which complete interim versions of the **FDVR** will be provided for review; (b) provide for review of a detailed methodology of the formation failure assessment required by **Condition E65(g)**; (c) allow each agency and the Planning Secretary at least one month for each review of the interim **FDVR**; (d) provide for every version of the interim **FDVR**: (i) an interim Independent Peer Review of Hydraulic and Hydrological Modelling to meet the requirements of **Condition E49**; and (ii) each of the requirements of the FDVR detailed in **Condition E65**; and (e) detail the process for revising the **FDVR** in response to comments provided on the interim **FDVR**.	This condition is not triggered as the interim FDVR has not been required as advised by JHG during the audit interview.		Not Triggered

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			The Final **FDVR** required by **Condition E65** must include a summary of comments received on the Interim **FDVR** and how these were addressed.			
5.68	E	E68	**Operational Erosion Mitigation and Monitoring Program** An **Operational Erosion Mitigation and Monitoring Program (OEMMP)** must be developed to respond to changes in erosion as a result of the CSSI and implement appropriate measures to mitigate erosion. The **OEMMP** must be implemented for all circumstances in which the CSSI: (a) exceeds the velocity QDL specified in **APPENDIX B SCHEDULE 1** and causes the resultant velocity to exceed the erosive threshold; or (b) is within an area that is actively eroding.	Operational Erosion Mitigation and Monitoring Plan Rev. 0, document no. 6-0019-220-IHY-D9-PJ-0001, dated 30 January 2026 was presented as evidence. The OEMMP is included in draft FDVR under Appendix F which is still in draft. Implementation was therefore not triggered at the time of the audit.		Not Triggered
5.69	E	E69	The **OEMMP** must be prepared in consultation with BCS, DCCEEW Water, relevant council(s) and landowner(s).	Section 3 'Stakeholder Consultation and Agreements' outlines the consultation undertaken with BCS (now CPHR-RD), DCCEEW Water, Cootamundra Gundagai Regional Council, the Junee Shire Council, and relevant landowners.		Not Triggered
5.70	E	E70	The **OEMMP** must include: (a) All design (including placement and alignment of drainage structures to mimic existing flow directions) and mitigation measures implemented within the project corridor as identified in **Condition E65** and any agreements for mitigation measures outside the rail	Compliance with the condition demonstrated as follows: (a) Sighted extension letter from DPHI ref. SSI-9406-PA-55, dated 11 December 2025, confirming to defer "implementation of identified		Not Triggered

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			corridor required by **Condition E58(d)** to the extent that those measures or agreements relate to erosion; (b) monitoring and adaptive management measures, including: (i) identification of monitoring areas including the upstream and downstream ends of all drainage structures, that meet the criteria identified in **Condition E68** and **E58,** 50 metres upstream and 150 metres downstream from each structure or to the end of any continuous active erosion (whichever is the longer); (ii) a baseline pre-construction survey of conditions within the monitoring areas; (iii) monitoring annually and after rain events greater than a 20% AEP for a period of 15 years of operation or as otherwise approved by the Planning Secretary; (iv) a process for adaptive management and mitigation measures if monitoring determines the project is adversely affecting erosion; and (v) a process for addressing complaints received that relate to erosion. The OEMMP must form part of the Flood Design Verification Report required by **Condition E64.** A copy of the monitoring results with appropriate commentary must be submitted to the Planning Secretary for information, within three months of completing the monitoring.	mitigation measures as identified in the OEMMP as they relate to condition E70(a) until prior to operation”. Also, Agreements with landowners are being managed separately to this Plan. (b) Monitoring and adaptive measures included: (i) As per section 6 “Identified of Erosion Control Monitoring Locations’ and section 7 ‘Monitoring and Adaptive Management Approach’ (ii) As per section 7 ‘Monitoring and Adaptive Management Approach’ (iii) As per section 7 ‘Monitoring and Adaptive Management Approach’ (iv) As per section 7 ‘Monitoring and Adaptive Management Approach’ (v) As per section 7 ‘Monitoring and Adaptive Management Approach’ and section 12		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Any rectification measures identified within the monitoring results must be developed in consultation with the affected parties and implemented as agreed with the affected parties, within twelve months of the monitoring results unless timing extension is agreed in writing with the landowner. ***Note:** The requirements of **Conditions E68** to **E70** apply in addition to the requirements of **Condition E57**.*	'Communication and Complaints Management' The OEMMP was verified to be included in the draft FDVR under Appendix F.		
5.71	E	E71	**Flood Review after Construction** Following substantial completion of a section or stage of the CSSI and 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 each of the following flood magnitude ranges that occur within or adjacent to the rail corridor – greater than 1% AEP, 1-5% AEP, 5-10% AEP and 10-20% AEP events (using AEP event trigger levels as agreed by the Secretary). The Flood Review Report(s) must be prepared by a suitably qualified and experienced hydrologist(s) and include: (a) a comparison of the observed extent, level, and duration of the flooding event against those predicted in (or inferred from) the **Flood Design Verification Report** required by **Condition E64**; (b) identification of the properties and infrastructure affected by flooding during the reportable event; and (c) where the observed extent and level of flooding or other flooding or erosion impacts exceed those predicted due to the CSSI with the consequent effect	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			of adversely impacting on property(ies), structures, infrastructure or the environment, and/or exceed the requirements specified in **Condition** E55: (i) determine if the exceedance is attributable to the CSSI, and (ii) where the cause is attributable to the CSSI, identify measures (including but not limited to physical alterations to the CSSI's design and/or revised operational maintenance measures or a combination of both) that would be implemented to reduce future adverse impacts of flooding from similar events related to the CSSI, including the timing and responsibilities for implementation. A copy of the **Flood Review Report(s)** must be submitted to the Planning Secretary BCS, the relevant roads authority and relevant council(s) for information, 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 parties and implemented within the timeframes specified in the **Flood Review Report(s)** or as agreed with the affected parties.			
5.72	E	E72	To analyse the lengths of rail corridor impacted by rainfall and consequential flood events for the purposes of **Condition** E71 the Proponent must develop spatially defined monitoring zones and associated monitoring methodologies for the flood catchments modelled in **Condition** A1. The	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

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			monitoring methodologies must provide an approach to infer rainfall intensities utilising the available Bureau of Meteorology rainfall monitoring stations suitable for each catchment, as well as utilising the available streamflow data and water level records. The methodology must be developed in consultation with BCS and DCCEEW Water and submitted to the Planning Secretary for approval within six (6) months prior to the commencement of operation of the CSSI.			
5.73	E	E73	**Flood Emergency Response Plan (FERP) for Flood Risks within the Rail Corridor** The Proponent must prepare and implement 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**. The **FERP** must: (a) be prepared by an experienced flood emergency response specialist who has extensive experience in preparation of these plans; (b) must confirm that residual flood risks are acceptable and the procedures within the FERP are consistent with best practice and the requirements of the Flood Risk Management Manual (2023) and its 'Toolkit'; (c) be appended to the **Flood Design Verification Report**, and	Sighted Flood Emergency Response Plan (FERP) Rev. 0, document no. 5-0019-220-IHY-00-RP-0001, dated 30 January 2026. Compliance with condition E73 demonstrated as follows: (a) as per section 1.5 'About the Authors' – Qualification and experience of authors 'Siobhan Maxwell' and Kyle Thomson' provided. (b) as per section 1.6 'Flood Risk Management Manual (2023) and its 'Toolkit'' and 2.6 'Likelihood of Flooding During Design Life of the Track'		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(d) detail the development of a flood warning system in the upper reaches of Dudauman Creek. The flood warning system should have the capacity to be adapted for use during the operational stage as a formal flood warning system for Stockinbingal. Once operational, equipment or plans developed for the **Flood Emergency Response Plan** (**FERP**) must be offered to the relevant agency for ongoing implementation and use. ***Note:*** *Nothing in this condition prevents the adaptation of an existing flood management or emergency plan to satisfy this condition.*	(c) as per section 1.2 'Purpose of the Flood Emergency Response Plan (FERP)' appended in draft FDVR under appendix D. (d) as per section 1.4 'Interpretation of CoA E73' and 4 'Flood Warning System'		
5.74	E	E74	**Information to Facilitate Management of Flood Emergency Risks beyond the Rail Corridor** 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, infrastructure asset owners and managers, and other affected parties can prepare, respond and recover from future flood emergencies. This must include but not be limited to: (a) documentation of the changes to flood behaviour including levels, depths, velocities, time of first inundation, duration of inundation 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;	Sighted Flood Emergency Risks Beyond the Rail Corridor Rev. 0, document no. 5-0019-220-IHY-00-RP-0002, dated 30 January 2026. The plan addresses condition E74 requirements: (a) as per section 5 'Changes to Flood Behaviour Beyond the Rail Corridor' and section 7 'Infrastructure Failure Scenarios' (b) as per section 7 'Infrastructure Failure Scenarios' (c) as per section 7 'Infrastructure Failure Scenarios' and appendix A to D	**Note:** (d) Appendix E is not included in the current document, and therefore the report does not demonstrate how IRPL will respond to requests for information from relevant personnel or agencies to support the preparation of flood emergency response plans.	Not Triggered

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			(b) consideration of changes to flood behaviour that may result from CSSI infrastructure failures or embankment collapses where these may occur during floods; (c) provision of sufficient detail and scope to enable the relevant personnel or agency (including the NSW SES, the relevant Council(s), affected property or infrastructure owners) to prepare for management of flood emergencies; and (d) respond to requests for information about the CSSI from those personnel or agencies in to assist them in preparing their own flood emergency response plans. This documentation shall be appended to the **Flood Design Verification Report** and be endorsed as consistent with the requirements of this condition by the same specialist preparing and certifying the **FERP** (required by **Condition E73**). ***Note:*** *affected parties include but are not limited to:* *a) land and property owners;* *b) infrastructure owners;* *c) EES;* *d) SES; and* *e) the relevant council(s), state and local government agencies.*	(d) as per section 3.2 “Purpose of this Report” (Appendix E is not present in document –but it does not yet show how IRPL will respond to requests for information from emergency agencies) Flood Emergency Risks Beyond the Rail Corridor is included in the draft DFVR under appendix E.		
5.75	E	E75	**Information Sharing** Flood information resulting from the requirements of this approval, including flood reports, models and geographic information system outputs, and work as executed information and the dimensions and finished levels of all	The project is still in construction phase. This condition is not yet triggered.		Not Triggered

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			structures within flood prone land, must be made available to the relevant council(s), TfNSW, BCS and the SES upon request. The relevant councils, TfNSW, BCS and the SES must be notified in writing by the proponent that the information is available no later than one (1) month following the completion of construction. Information requested by a relevant council, TfNSW, BCS or the SES must be provided within three (3) months of the request.			
WATER QUALITY AND DRAINAGE						
5.76	E	E76	The CSSI must be designed, constructed and operated so as to maintain the *NSW Water Quality Objectives* where they are being achieved as at the date of this approval, and 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. ***Note:*** *If it is proposed to discharge construction stormwater to waterways, a Water Pollution Impact Assessment will be required to inform licensing, consistent with section 45 of the POEO Act. Any such assessment must be prepared in consultation with the EPA and be consistent with the National Water Quality Guidelines, with the level of detail commensurate with the potential water pollution risk.*	JHG noted during the audit interview the following: • there have been no discharges to date with no discharge points in place. • Currently applying for EPL variation to include discharge points. • All water is contained and reused onsite. • No overtopping from rain events to date. • Potable water tested by utility company for relocation of testing line at Old Cootamundra Rd – hydro static testing of the main,		Compliant

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				discharged from water line, pumped into turkeys nest and then reused for dust suppression. - TARP hasn't been triggered yet. - Goldenfields Council is the water supplier. No licence requirements for connection to the mains. Water use is metered. Feedback as discussed from DCCEEW for annual reporting – annual timing has not yet been triggered. JHG noted that the Water Reuse Strategy contains water supply requirements; no water extraction occurring; water metering under framework not applicable; no water access license.		
5.77	E	E77	The CSSI must be designed, constructed and operated to: (a) ensure all drainage feature crossings (permanent and temporary watercourse crossings and stream diversions) new or modified surface water drainage (including cess drains), depressions are designed and constructed and maintained in accordance with Guidelines for controlled activities on waterfront land: riparian corridors (Department of Industry, 2018) and Policy and Guidelines for Fish Habitat Conservation and Management (Department of Primary Industries, 2013); (b) locate all scour protection work associated with replacement culverts or the construction of new	IRPL are still discussing designs with DPHI. Consultation with DPI Fisheries unchanged since previous audit - Consultation records with DPI Fisheries were presented. Sighted email from DPI Fisheries, dated 30 September 2025, endorsing the detailed temporary waterway crossing designs received on 15 September 2025.		Not Triggered

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			culverts within the rail corridor, or as agreed to by the relevant landowner in accordance with Condition E57; (c) ensure that there is no permanent interception of, and/or connection with, groundwater; (d) 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; and (e) ensure that any recycled wastewater (including recycled/treated water) proposed for use by the CSSI, considers risks to human health or the receiving environment and meets the relevant standards.	Smaller culverts have commenced construction as noted during the audit interview.		
5.78	E	E78	Unless an EPL is in force in respect to the CSSI and that license specifies alternative criteria, discharges from construction water treatment plant(s), where required, to surface waters must not exceed: (a) the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2018* (ANZG 2018) default guideline values for toxicants at the 95 per cent species protection level; (b) for physical and chemical stressors, the guideline values set out in Tables 3.3.2 and 3.3.3 of the *Australian and New Zealand Guidelines for Fresh and Marine Water Quality 2000*; and (c) for bioaccumulative and persistent toxicants, the ANZG 2018 values at a minimum of 99 per cent species protection level. Where the ANZG 2018 does not provide a default guideline value for a particular pollutant, the approaches set out in the ANZG 2018 for deriving guideline values, using interim	No construction water treatment plant on site; sediment basin in place for managing construction water as verified during the site inspection.		Not Triggered

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			guideline values and/or using other lines of evidence such as international scientific literature or water quality guidelines from other countries, must be used.			
5.79	E	E79	Prior to construction impacting a landowner anywhere on the alignment, the Proponent must consult with the landowner and/or relevant roads authority that is located immediately adjacent to new or upgraded culverts to determine the potential for impacts on infrastructure, dwellings, property access, 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 or relevant roads authority on the management measures that will be implemented to mitigate the impacts. The outcomes of the consultation with affected landowners or relevant roads authority must be documented.	Sighted a private property consultation form dated 29 July 2025, confirming consultation with the Old Sydney Road landowner. The consultation addressed flood model design changes, the farm dam register, native vegetation, condition surveys, as well as construction and operational noise and vibration. Also, sighted private property consultation form dated 26 November 2025, confirming consultation with 582 Ironbong Rd owner.		Compliant
5.80	E	E80	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. The Register must include: (a) property, location within property and owner; (b) approximate surface area, depth and volume;	Sighted Dam Register document no. 5-0019-220-IHY-00-RG-0001_A – last updated on 5 November 2025. The register includes property name, lot no., dam location, dam surface area, dam inflow upstream, dam outflow downstream, water diverting structures, existing catchment area, developed catchment area, dam		Compliant

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			(c) alignment of dam inflow and outflow for 500m upstream and 100m downstream of the dam; (d) identification of all contour banks, drains or other water diverting structures that influence the water supply yield of existing farm dams; (e) catchment area feeding the dam; (f) identification of all surface water and groundwater sources supplying the dam; and (g) a map showing the items in (a) to (f) above. 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.	water source, and impacts to owner and Project. Dam Register is also provided in FDVR under Appendix B7. IRPL confirmed during the audit interview that there have been no changes to the dam register. Sighted a private property consultation form dated 29 July 2025, confirming consultation with the Old Sydney Road landowner. The consultation addressed flood model design changes, the farm dam register, native vegetation, condition surveys, as well as construction and operational noise and vibration. Also, sighted private property consultation form dated 26 November 2025, confirming consultation with 582 Ironbong Rd owner.		
5.81	E	E81	The design of the Project including the longitudinal drainage and the cross drainage, is to be prepared to ensure there are no significant impacts to the farm dams in the Register and the other items listed in **Condition E77**. The hydrological modelling, calculations or other assessments demonstrating no significant impacts are to be documented.	IRPL confirmed during the audit interview that no significant impacts have been identified as part of the alignment, noting that hydrological modelling is still ongoing.		Not Triggered
5.82	E	E82	Where culverts, bridge abutments and other cross drainage structures are designed to pass flood and surface water	Sighted Technical Memorandum by JHG "Compliance criteria to Minister's		Not Triggered

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			flows through the rail formation, the orientation of these structures is to be aligned with the existing flow direction to minimise disturbance of existing flow patterns around the entries and exits to these structures, or as otherwise agreed by the Secretary.	Conditions of Approval E82", dated 10 July 2025. The memo is included in FDVR under appendix B10. This will be submitted with the FDVR.		
5.83	E	E83	**Construction Requirements** The construction of the CSSI must protect the integrity of riparian corridors in accordance with the *Guidelines for controlled activities on waterfront land: Riparian Corridors* (Department of Industry 2018) when carrying out Work within 40 metres of a watercourse.	Sighted I2S Project Daily Bulletin, dated 5 December 2025, issued during the December possession, which states that "The closest waterway is Billabong Creek, approximately 1.7 km from the work area." Sighted the I2S Project Daily Bulletin dated 27 February 2026, issued during the February possession. The environmental section outlines measures to be implemented during the works, noting that activities were being undertaken adjacent to and within the vicinity of Billabong Creek.		Compliant
5.84	E	E84	**Surface Water Monitoring Program** A **Surface Water Monitoring Program** must be prepared in consultation with DCCEEW Water for construction and for a minimum of two years from commencement of operation or as otherwise agreed with the Secretary. The **Surface Water Monitoring Program** must include, but not be limited to:	Surface Water Monitoring Program has been prepared and included within Soil and Water Management Plan Rev. 0, dated 4 August 2025 as presented as evidence. The monitoring program was prepared in consultation with DCEEW – consultation summary report included under Appendix A of the Soil and Water Management Plan.		Compliant

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			(a) identify surface water monitoring locations, frequency and duration at discharge points and selected watercourses where works are being undertaken; (b) identify surface water monitoring parameters; (c) include water quality objectives, parameters and criteria from documents listed in **Condition** **A1;** (d) monitoring of operational meters installed, recording and reporting to Natural Resources Regulator, in accordance with the relevant requirements of the *NSW Non-Urban Water Metering Policy* (DPIE, 2020) and clause 21(6) of the *Water Management (General) Regulation 2018*. (e) monitoring to ensure water quality complies with relevant drinking water criteria from the *National Water Quality Management Strategy Australian Drinking Water Guidelines 6 2011* (National health and Medical Research Council 2017) (f) monitoring geomorphological changes downstream of water treatment plant(s) (where required) and on watercourses' (at locations where the velocity QDL is exceeded or there is active erosion) physical structure on at least four cases of inundation to ensure mitigation measures are achieving desired outcomes; (g) trigger points for responding to any monitored changes which adversely impact on baseflows of creeks in the vicinity of the CSSI, including the implementation of additional protection measures to address these	Compliance with condition E84 demonstrated as below: (a) as per section 6.2 'Monitoring Locations' (b) as per section 6.3 'Surface Water Quality Objectives and Trigger Values' (c) as per section 5.5 'Water Quality' and section 6.3 'Surface Water Quality Objectives and Trigger Values' (d) as per section 6.7 'Water extraction monitoring' (e) as per section 6.3 'Surface Water Quality Objectives and Trigger Values' (f) as per section 6.8 'Geomorphology Monitoring' (g) as per section 6.8 'Geomorphology Monitoring' (h) as per section 7.6 'Reporting' (i) as per section 7.6 'Reporting'		

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			changes and their associated timing (trigger points must be defined and designed as part of the **Program** in consultation with DCCEEW Water); (h) methods for providing the data collected to the relevant water authority where discharges are directed to their assets; and (i) a method for providing the surface water monitoring data to DCCEEW Water every six months during construction and for a minimum period of two years from commencement of operation or as otherwise agreed with the Secretary. ***Note:*** *With regards to monitoring data to be provided to DCCEEW Water, the format of the dataset must be both in a tabulated and electronic quality-controlled data (.csv, Excel) ready to use format.*			
5.85	E	E85	The Surface Water Monitoring Program for construction must be submitted to and approved by the Planning Secretary before construction and the Surface Water Monitoring Program for operation must be submitted to and approved by the Planning Secretary prior to the completion of construction. The Surface Water Monitoring Programs for construction and operation must be implemented. ***Note:*** *Nothing in this condition prevents the Proponent from preparing separate or combined Surface Water Monitoring Programs for the construction and operational phases of the CSSI.*	Surface Water Monitoring Program for construction was approved by DPHI as per approval letter, dated 4 September 2025 as verified during the initial audit. Surface water monitoring report every 6-months. Implementation has not yet been triggered.		Not Triggered
TRAFFIC, TRANSPORT AND ACCESS						

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.86	E	E86	Construction traffic must not use local roads or privately-owned roads unless no alternative access is available. Use of private access roads must be in accordance with Conditions C7 and C8. Local or privately owned roads used for access to ancillary facilities, construction sites, and temporary accommodation must be identified in the Construction Traffic, Transport and Access Management Sub-plan required by Condition C13.	On the 19 March 2026, during the DPHI and CPHR site inspection, the use of Gate 1 was highlighted by DPHI as an unapproved access point in the CTTAMP. At the time JHG confirmed use of the gate (which had commenced during the set-up for the February 2026 Possession) and outlined that the CTTAMP was to be updated to include the access point in the 6-month review cycle which had been agreed with the ER. JHG also detailed the access gate was included in a Consistency Assessment (CA) on the Inland Rail website. IRPL discussed the access point with the ER and it was agreed the CTTAMP was required to be updated to include the relevant information from the CA prior to commencing the activity/using the access point. This was self-reported as a non-compliance and captured as part of this audit under Condition C26. The following actions were undertaken to address the non-compliance: • CTTAMP updated as per Condition C21 and under review.	Refer to Non-Compliance I2S-02_NC-03 under condition C26.	Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				- CTTAMP updates to be finalised with ER endorsement once reviewed - Use of gates are being monitored as per weekly site inspection as advised by JHG. - *Use of gates captured under daily bulletin, dated 23 April 2026, stating "No Access Via Gate 1, Only Via Gate 2 Old Sydney Rd"* JHG confirmed during the audit interview that all approved gates, and local roads are being used as per the CTTAMP. Landowners agreement for the access to ancillary facilities as per Condition C7. Works done under a Works Authorisation Deed (WAD) on ARTC & Linkx Bulk Haulage land. Sighted Section 138 approval from Junee Council for Warrens Lane, dated 14 April 2026. Currently seeking agreement with TfNSW for Burley Griffin Way and Hibernia Street under WADs.		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.87	E	E87	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 or as otherwise agreed with the relevant council and bus operator. 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.	No bus stops relocation or closures required to date as advised by JHG during the audit interview.		Not Triggered
5.88	E	E88	**Level Crossing Treatment Reports** 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 the relevant road authority. 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 established, closed or upgraded; (c) describe the treatments that will be implemented at new and/or upgraded crossings; (d) include measures to avoid potential short-stacking at level crossings; and (e) provide justification for any proposed closures.	Sighted Public Level Crossing Treatment Report Rev. 0, document no. 5-0019-220-CXR-00-RP-0002, dated 1 April 2026. The Report was submitted to DPHI ref. SSI-9406-PA-84 on 7 April 2026 as evidenced. Compliance with this condition demonstrated below: (a) as per section 3 'Introduction' (b) as per section 3 'Introduction' (c) as per appendix B 'Level Crossing Treatment Summary' (d) as per section C 'Short Staking Review'		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			The assessment of level crossings must use the Australian Level Crossing Assessment Model (ALCAM). The process for determining the type of level crossing treatment must be consistent with the process outlined in the documents listed in Condition A1. 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.	(e) as per section 6 'Level Crossing Closure Summary' ALCAM model has been used for the assessment of level crossings as per Appendix B 'Level Crossing Treatment Summary' Risk assessment of roads and level crossing included under appendix D 'Level Crossing Risk Assessment Evidence' and appendix E 'Risk Assessment Summary' Road authority (Junee Shire Council, Cootamundra Gundagai Regional Council, and Crown Lands) endorsements are included under Appendix F 'Road Authority Endorsement of LX Design'. However Junee Council didn't endorse Unnamed Road (PU15950) and Old Sydney Road. An RFI was received from DPHI, DATED 7 April 2026 ref. SSI-1055-PA-180, requesting clarification on level crossings in Junee, including the endorsement status from Junee Council. IRPL is currently preparing a response to address DPHI's comments.		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.89	E	E89	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 establishment, 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 established, closed or upgraded; (c) describe the treatments that will be implemented at new and/or 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. The establishment, closure, relocation or modification of formal private level crossings must be included in the **Individual Property Management Plans** required by **Condition E95**, noting that any new, closure, relocation or modification must be in accordance with *AS/RISSB 7658:2012 Railway Infrastructure – Railway Level Crossing* and relevant rail safety legislation. The Proponent must consult with relevant landowners on the design of the crossing and where consistent with relevant safety standards	Sighted Private Level Crossing Treatment Report document no. 5-0019-220-CXR-00-RP-0001, Rev. 0, dated 20 April 2026. Compliance with this condition demonstrated below: (a) as per section 7 "Location of Private Level Crossings" (b) as per table 5 "Level Crossing Treatment Summary", section 7 "Location of Private Level Crossings" and section 9 "Closure of Private Level Crossings" (c) as per table 5 "Level Crossing Treatment Summary" and section 8 "Level Crossing Treatments" (d) as per section 9 "Closure of Private Level Crossings" (e) as per section 5 "Consultation" and appendix A "Consultation Outcomes" IPMPs have been prepared but not yet finalised. Design consultation Round 3		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			and legislation, incorporate reasonable landowner requirements into the design. ***Note:*** *The presumption of this condition is that the proponent will adopt landowner requests unless they can demonstrate why they cannot.*	occurring; once complete, the IPMPs will then be finalised.		
5.90	E	E90	The **Public Level Crossing Treatment Report** and **Private Level Crossing Treatment Report** must be submitted to and approved by the Planning Secretary at least one (1) month prior to the establishment, 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.	Sighted submission letter to DPHI, dated 7 April 2026, confirming the submission of the Public Level Crossing Treatment Report Rev. 0, dated 1 April 2026. Sighted post approval receipt ref. SSI-9406-PA-84, dated 7 April 2026. The Private Level Crossing Treatment Report was submitted to DPHI on 23 April 2026. Sighted post approval receipt SSI-9406-PA-90, dated 23 April 2026.		Compliant
5.91	E	E91	**Level Crossing Performance Report** Within one year of commencing operation, and ten years after commencement of operations, 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	This condition will be triggered upon commencement of operation.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			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 work 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** E88; (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.			
5.92	E	E92	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 local and classified roads as a result of vehicle queuing; and	This condition will be triggered upon commencement of operation.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(b) all reported near misses and collisions at level crossings within the project area.			
5.93	E	E93	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 made publicly available and provided to relevant road authority within 60 days of its completion.	This condition will be triggered upon commencement of operation.		Not Triggered
5.94	E	E94	**Property Access** The Proponent must consult with all landowners where the project will either temporarily or permanently impact farm operations, access to the property from public roads and/or to other parts of the property owned by the landowner to ensure that impacts to the use of properties are minimised and mitigated. This consultation must include, but not be limited to: (a) safe and convenient stock and machinery movement across the rail corridor, including provision and maintenance of livestock holding pens; (b) the safe and efficient operation of agricultural aerial activities; (c) provision and maintenance of fencing of a type suited to stock and livestock husbandry operations	All agreements were in place by November 2025 as confirmed by JHG during the audit interview, with Temporary Access Agreements currently in design phase as per the Individual Property Management Plans (IPMPs). IPMPs have been prepared but not yet finalised. Design consultation Round 3 occurring; once complete, the IPMPs will then be finalised.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			conducted on the property (including barrier fencing where appropriate); and (d) relocation of farm infrastructure necessitated by the CSSI. Details of consultation and agreed management measures must be included in the Individual Property Management Plans required by **Condition** **E95**. ***Note:*** *Acquisition or adjustment of property and access that includes Crown land/roads must consider the relevant provisions in the Land Acquisition (Just Terms Compensation) Act 1991, Crown Land Management Act 2016 and/or the Roads Act 1993.*			
5.95	E	E95	**Individual Property Management Plans** must be prepared to document the results of consultation with landowners identified to be consulted by **Condition** **E94** with and agreed outcomes. The Proponent must implement all reasonable measures proposed by landowners. A copy of the **Individual Property Management Plan** must be provided to the landowner. A copy of each agreement must also be provided to the Planning Secretary upon request. ***Note:*** *The Communications Strategy required by* ***Condition B2*** *includes a procedure and mechanism to resolve and mediate disputes in relation to construction and impacts to property and infrastructure.*	Individual Property Management Plans will be finalised following completion of the design consultation process. Sighted email from Stakeholder engagement Officer – IRPL, dated 23 April 2026, confirming that the Private Crossing design criteria forms has been signed by 6 Landowners with evidence attached. Sighted signed form of N. Emery (landowner), dated 9 September 2024.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.96	E	E96	No part of any crossing loop may cross over any driveway, private road or public road unless determined in consultation with the relevant landowner and any other adjacent landowner whose access is impacted by the crossing loop, and with the relevant road authority for any road within 60m of the road and rail interfaces.	No crossing loops in design; no consultation has been required as advised by JHG during the audit interview.		Not Triggered
5.97	E	E97	The Proponent must maintain existing access to properties during the entirety of work where practicable. 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 standard determined through consultation with the landowner, at no cost to the property landowner, unless otherwise agreed with the landowner.	CTTAMP Section 5.7 'Management of Property Access' outlines the process of maintaining existing access to properties. The temporary crossings are as per IPMPs and links to the Private Level Crossing Agreements. Sighted Temporary Level Crossing Agreement for torrens title – 202/1300288, signed for 3 years, dated 21 June 2024.		Compliant
5.98	E	E98	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 determined 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.	CTTAMP Section 5.7 'Management of Property Access' outlines the process of maintaining existing access to properties. The temporary crossings are as per IPMPs and links to Private Level Crossing Agreement. Sighted Temporary Crossing Agreement for torrens title – 202/1300288, signed for 3 years, dated 21 June 2024.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.99	E	E99	The Proponent must implement and maintain a system for the communication of train movements through level crossings to facilitate safe movement of livestock and agricultural machinery across the rail corridor. The system must be developed in consultation with landowners, stock operators and Local Land Services, and be accessible to them prior to the commencement of operation. A report detailing the implemented system and communication to stakeholders of the communication system must be submitted to and approved by the Planning Secretary at least one (1) month prior to commencement of operation.	This condition will be triggered during pre-operational stage.		Not Triggered
5.100	E	E100	The Proponent must notify Local Land Services at least 1 month prior to access and movement restrictions on the Old Cootamundra Road underbridge to enable alternative stock routes to be used.	JHG confirmed during the audit interview that there have been no impacts to date. This condition is not yet triggered.		Not Triggered
5.101	E	E101	**Road Safety** 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. A copy of **the Road Dilapidation Report** must be provided to the relevant road	As evidenced during the initial audit, the following reports were presented: Illabo to Stockinbingal Road Condition Report Rev. B, dated 29 July 2025.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			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.	Aconex submission (ref. IR2200-TRANSMIT-001268) to Junee Shire Council, dated 8 August 2025. Aconex submission (ref. IR2200-TRANSMIT-001269) to TfNSW, dated 8 August 2025. Aconex submission (ref. IR2200-TRANSMIT-001267) to Cootamundra-Gundagai Regional Council, dated 8 August 2025. JHG confirmed during the audit interview that no dilapidation reports were required for action during the audit period. This condition was therefore not triggered.		
5.102	E	E102	The **Road Dilapidation Report** shall provide measures to ensure: (a) roads deemed unsafe for the use of heavy vehicles are upgraded and repaired prior to use; (b) roads used can safely accommodate heavy vehicle haulage based on volume, types and duration of use; and (c) road repair is undertaken periodically before and during construction.	JHG confirmed during the audit interview that no road dilapidation reports were required in this audit period.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Where the road is not up to standard due to condition, width, pavement type, and road geometry, the Proponent must upgrade the road to a service level equal to (or better than) the level it was being maintained immediately prior to construction and before heavy haulage commences, at no cost to the owner.			
5.103	E	E103	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 relevant road authority's discretion): (a) rectify the damage to restore the road to at least the condition it was in at the time of the dilapidation survey in **Condition E101**; or (b) compensate the relevant road authority(ies) for the damage so caused. The amount of compensation may be agreed with the relevant road authority(ies), but compensation must be paid even if no agreement is reached; or (c) where other agreements are in place, leave, maintain or remunerate for damages to these roads in accordance with these agreements. Damage to roads that affects road safety or trafficability as a result of the construction of the CSSI must be rectified by the Proponent as soon as practicable after the damage is identified, at no cost to the owner.	This condition will be triggered upon completion of construction.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.104	E	E104	The CSSI (including any new overbridges, new or modified roads, and new or modified level crossings) must be designed and constructed to meet relevant design, engineering and safety guidelines, including the *Austroads Guide to Traffic Management*, and relevant Transport for NSW Austroads Supplements, as agreed with the roads authority and TfNSW. Consideration must be given to the movement of livestock, farming machinery, and pedestrians.	No new or modified roads constructed to date as confirmed by JHG during the audit interview. This will become triggered for Burley Griffin Way – detailed design still to be finalised.		Not Triggered
5.105	E	E105	The design of any new grade separated rail and road infrastructure, or new or modified roads must be developed in consultation with TfNSW and endorsed by the relevant roads authority prior to construction of the new road overbridges or new or modified roads.	JHG advised during the audit interview that Burley Griffin Way design is still in development. This condition is not yet triggered.		Not Triggered
5.106	E	E106	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*, including but not limited to for all areas identified by the Safe Systems Assessment as requiring further assessment. Audit findings and recommendations must be actioned before construction of the relevant infrastructure and must be made available to the Planning Secretary on request.	JHG advised during the audit interview that Road Safety Audits (RSAs) are issued as part of design report for each package and then issued to stakeholders for review. RSA actioned as part of Burley Griffin Way and level crossings during audit period: Sighted Pre Construction Road Safety Audit (Junee Shire Council) Rev. 00 prepared by Civlink Consulting, dated 23 May 2025.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				IRPL confirmed during the audit interview that there have been no requests from DPHI to provide RSAs.		
5.107	E	E107	**Pedestrian and Cyclist Access** Safe pedestrian and cyclist access, where such access exists, 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.	No restrictions noted during audit site inspection.		Not Triggered
5.108	E	E108	**Country Rail Network Interface** The design of any new or modified connection to the Country Rail Network (CRN) must be developed in consultation with the CRN Rail Infrastructure Manager (RIM) and TfNSW. Designs, management plans and programs of work must be endorsed by the CRN RIM and TfNSW prior to construction of any new or modified connection.	Country Rail Network (CRN) is to the northern end of site (Stockinbingal). This condition is not yet triggered. Weekly coordination meetings are being held with CRN, with TfNSW also in attendance. These discussions are focused on finalising the licence for the JHG temporary access pad and confirming property boundaries. Sighted meeting minutes, dated 14 April 2026, IFC drawings to be submitted. L4, L3, L6 and E7. CRN comments closed; final packages to be provided. Sighted email from IRPL to JHG, dated 31 July 2025, confirming that they have		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				received the TfNSW approved version of package L4. Sighted submission of package L4: Corridor Works - Rail Systems Civil Works to UGL via Aconex ref. IR2200-TRANSMIT-001642, dated 17 October 2025. IRPL confirmed during the audit interview that IFC has not yet been issued due to pending acceptance.		
SOCIAL IMPACTS						
5.109	E	E109	**Social Impact Management Plan** A **Social Impact Management Plan** (**SIMP**) must be prepared for the CSSI to guide the management and monitoring of the social impacts of the CSSI including informing detailed design, and during construction and operation. The SIMP must: (a) be prepared in accordance with the *Social Impact Assessment Guideline* (DPE 2023) by suitably qualified and experienced person(s) in the social sciences in accordance with Appendix B of the *Social Impact Assessment Guideline* (DPE 2023); (b) be developed with involvement from directly affected communities and businesses, LALC/s, community organisations and representative groups, and councils;	Social Impact Management Plan document no. 5-0019-220-PMA-00-PL-0064, Rev. 1, dated 30 October 2025 as reviewed as part of this audit. Approval letter from DPHI for submission timeframe extension of Social Impact Management Plan (SIMP) under SSI-9406-PA-15, dated 1 May 2025, was sighted, confirming that the SIMP to be submitted concurrently with the Stage 2 CEMP Rev. 0, dated 14 July 2025. The SIMP was verified to address condition E109 requirements:		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(c) inform where relevant the preparation of **CEMP Sub-plans** and monitoring plans; (d) define the period over which it will be implemented based on the duration of anticipated impacts it predicts; (e) include measures to support **the Community Complaints Mediator** required by **Condition B12**; and The **SIMP** must be approved by the Planning Secretary at least one month before the receipt of **CEMPs, CEMP sub-plans** and monitoring programs required by **Conditions C12** and **C17**. The **SIMP** must be implemented.	(a) as per section 3.3 'SIA Guideline' and Appendix A 'Qualification of Contributors' (b) as per section 5 'Consultation' and Appendix B 'Consultation Summary Report' (c) as per section 7.3 'Interface with CEMP Sub-Plans and Monitoring Plans' (d) as per section 7 'Mitigation and Monitoring of Social Impacts' (e) as per section 3.5 'Community Complaints Mediator' Approval letter from DPHI, dated 29 August 2025, confirming the initial approval of the Social Impact Management Plan Rev. 0 dated 28/07/2025 as presented during the previous audit. The revised SIMP Rev. 1.1, dated 19 April 2026 has been transmitted to IRPL for review. Sighted Aconex submission ref. JH-TRANSMIT-002681, dated 21 April 2026. This review is part of the 6-monthly review process.		
5.110	E	E110	The **SIMP** must include specific details of the commitments, programs and timing to secure and enhance positive social outcomes, and measures to minimise negative social and cumulative impacts associated with the CSSI, including: (a) revisions to or refinement of the assessment of social impacts and risks;	The SIMP was verified to address condition E110 requirements: (a) as per section 5.5 'Outstanding Consultation items' (b) as per section 7 'Mitigation and Monitoring of Social Impacts'	**Non-Compliance I2S-02_NC-06:** The SIMP Quarterly Report Q4 2025 was not uploaded on the	Non-Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(b) additional mitigation measures to address social impacts based on those committed to in the documents listed in **Condition A1** and **E109** above; (c) details on social-oriented commitments to be delivered such as those related to employment diversity and procurement; and (d) details of how measures will be targeted and adapted to meet the needs of affected communities, including legacy benefits to directly affected communities; and (e) a monitoring program, prepared in accordance with **S5.2** of the *Social Impact Assessment Guideline* (DPE 2023), to: (i) monitor, review, and report on the effectiveness of the identified measures; (ii) report on community engagement and complaints in relation to social issues; and (iii) report on adaptative management measures implemented or proposed. Reporting on the social impact performance of the CSSI, including monitoring results, must be reported quarterly with the results made publicly accessible in accordance with **Condition B18**.	(c) as per section 7 'Mitigation and Monitoring of Social Impacts' (d) as per section 7 'Mitigation and Monitoring of Social Impacts' (e) as per section 7 'Mitigation and Monitoring of Social Impacts' Sighted Social Impact Management Plan Quarterly Progress Report Q4 2025, document no. 6-0019-220-ESP-00-RP-0001, revision 0, dated 29 January 2026. The quarterly report includes the details of SIMP targets, community engagement activities and complaints management. Following engagement undertaken in this Q4 2025: • During October 2025, there were a total of 230 interactions between JHG and the community. Recorded in Consultation Manager for the reporting period is an additional 42 interactions between IRPL and various stakeholders. • During November 2025, there were a total of 230 interactions between JHG and the community. Recorded in Consultation Manager for the reporting period is an	website as required by Condition E110, therefore triggering a non-compliance. It is recommended that upload occur without delay to be fully compliant with Condition E110. This has been rectified, with the SIMP Quarterly Reports for Q4 2025 and Q1 2026 uploaded to the website as evidenced during the closing meeting. This non-compliance is now considered closed.	

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				additional 8 interactions between IRPL and various stakeholders. • During December 2025, there were a total of 186 interactions between JHG, IRPL and the community. Recorded in Consultation Manager for the reporting period is an additional 8 interactions between IRPL and various stakeholders. Also sighted Social Impact Management Plan Quarterly Progress Report Q4 2025, document no. 6-0019-220-ESP-00-RP-0002, revision 0, dated 24 April 2026.		
5.111	E	E111	**Temporary Workforce Accommodation Facilities** Temporary workforce accommodation facilities must be completed prior to commencement of construction. The accommodation facilities must be designed to ensure sufficient capacity to house the peak workforce and operate to ensure for the surrounding community and accommodation facility occupants: (a) environmental amenity, particularly in relation to noise, air quality and lighting; and (b) security, in particular for vulnerable community members and workers.	Prior to commencement condition reviewed as compliant during the previous audit. This condition is no longer triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.112	E	E112	The accommodation facilities must be managed and appropriately staffed to minimise amenity and social impacts associated with the running of the accommodation facilities, both within and outside of the accommodation facility. Suitably qualified and experienced resident facility manager(s), security and paramedic staff must be employed and be available while the accommodation facilities is running.	An outsourced company, QVC, continues to manage the Camp under contract with QVC (Contract no. 7688-027) as confirmed by JHG during the audit interview.		Compliant
5.113	E	E113	Delivery servicing is limited to the work hours specified in **Conditions E1** and **E2**, unless any out of hours noise related to the delivery servicing complies with **Condition E3**.	Temporary Works Accommodation Management Plan (TWAMP) section 5.8 ‘Working Hours’ outlines the timing of deliver services in compliant with condition E1 and E2. JHG confirmed that there have been no out of hours deliveries during the audit interview.		Compliant
5.114	E	E114	Outdoor recreation areas of the accommodation facilities can only be used between 7.00am and 10.00pm daily.	TWAMP section 5.8 ‘Working Hours’ - The outdoor recreation areas will only operate within the hours of 7am-10pm as required by Condition E113. This is also communicated in the Village Rules attached as Appendix B to this Plan.		Compliant
5.115	E	E115	On site utilities including water, wastewater and electricity must be designed and located in accordance with Council specifications and relevant standards, in consultation with Council.	Sighted Section 68 with Cootamundra-Gundagai Council for onsite sewerage management, dated 24 October 2025.		Compliant

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5.116	E	E116	Telecommunications upgrades undertaken for the Accommodation facilities must consider the ability to provide long-term improvements to mobile telephone and internet capacity in surrounding areas.	As per email conversation with Telstra for the mobile and internet capacity for the camp facility with the last email on 1 October 2025 presented during the initial audit, confirming to provide feasibility and commercial quotation to upgrade capacity for the workers camp and Stockinbingal community. Starlink in use for Camp for the mobile and internet services – Project has offered assistance for Stockinbingal community. Sighted media release from Telstra for upgrading 4G/5G coverage in Stockinbingal. *For upgrades, temporary disruptions are expected from 20 January to 24 January 2026*.		Compliant
CODE OF CONDUCT						
5.117	E	E117	The Proponent must prepare and implement a Workforce Code of Conduct for employees and contractors involved in the construction of the CSSI. The Code of Conduct must be prepared by a suitably qualified and experienced person(s) in the human resources sector and made publicly available prior to work commencing. The Code of Conduct sets out the ethical standards that employees are expected to adhere to	Workforce Code of Conduct Rev. 0, dated 16 December 2024 was presented as evidence and noted to be unchanged during the audit period. The Workforce Code of Conduct was noted to be available on website.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			in the construction site and interaction with the local community.			
5.118	E	E118	The Employee Code of Conduct applies to all employees on the CSSI site (including the temporary workforce accommodation facilities) and those living in the community in the surrounding towns. The Employee Code of Conduct must: (a) set out the ethical standards for the behaviour and conduct of employees on and off the site, including for driving on public roads; (b) include disciplinary actions where employee behaviour and conduct do not meet the ethical behaviour standards; and (c) include processes for responding to and addressing community complaints about the behaviour and conduct of employees.	Workforce Code of Conduct Rev. 0, dated 16 December 2024 was reviewed and compliance with condition E118 demonstrated as below: (a) as per appendix A ‘Ethical Behaviour Policy in Practice’ (b) as per section 3.12 ‘Outline of Counselling & Disciplinary Process’ (c) as per appendix B ‘Complaints Management Process’		Compliant
5.119	E	E119	The Employee Code of Conduct must be reviewed 12 months after approval and annually thereafter for the duration of construction. Updates to the Code of Conduct must be approved by the ER. The updated Code of Conduct must be made publicly available within one month of approval.	The Workforce Code of Conduct Rev. 0, dated 16 December 2024 has not undergone a review within the 12-month period. The December 2024 version of the Workforce Code of Conduct was noted to be available on website.	**Non-Compliance I2S-02_NC-07:** The Workforce Code of Conduct Rev. 0, dated 16 December 2024 was not reviewed within the annual timeframe as required by Condition E119.	Non-Compliant

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					JHG provided evidence that a review has now been undertaken. Sighted Workforce Code of Conduct Rev. 0.1, dated 27 April 2026, issued to IRPL for review via Aconex ref. JH-TRANSMIT-002759, dated 4 May 2026, with the ER still to approve the Code of Conduct. It is recommended that JHG implement a process to ensure timeframes are continually met. This non-compliance is now considered closed.	
BUSHFIRE MANAGEMENT						
5.120	E	E120	The Proponent must minimise the fire risks of the development, including managing vegetation fuel loads within and adjacent to the corridor during construction of the CSSI, and ensure that the development:	Bushfire Emergency Plan document no. 5-0019-220-PMA-00-PL-0065, Rev. 0, dated 1 October 2025 was reviewed as compliant during the previous audit. IRPL and JHG		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(a) (i) complies with the relevant asset protection requirements in the RFS's Planning for Bushfire Protection 2019 (or equivalent) and Standards for Asset Protection Zones; (ii) incorporates the recommendations of a fire risk assessment as per TfNSW design standards; and (iii) is suitably equipped to respond to any fires on site, including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located at each at locations identified by the fire risk assessment (including all weather access to the water supply tanks for Category 1 tankers); and (b) develop procedures to manage fire hazard and potential fires on site, in consultation with the RFS and FRNSW; (c) assist the RFS, FRNSW and emergency services as much as practicable if there is a fire in the vicinity of the site; and (d) notify the relevant local emergency management committee following completion of construction of the development, and prior to commencing operations.	advised during the audit interview that it is planned for review. APZ design of 50m for the Camp included within BMP under section 5.6.		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.121	E	E121	**Bushfire Emergency Plan** Prior to commencing construction, the Proponent must develop and implement a comprehensive **Bushfire Emergency Plan** and detailed emergency procedures for the infrastructure, in consultation with RFS and FRNSW and provide a copy of the plan to the local Fire Control Centre. The plan must: (a) be consistent with: (i) RFS's Planning for Bushfire Protection 2019 (or equivalent); (ii) RFS's Development Planning - A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan; (iii) the Fire and Rescue NSW Act 1989; (iv) the Work Health and Safety (WHS) Act 2011; (b) identify the fire risks and hazards and detailed measures for the CSSI to prevent or mitigate fires igniting, including risks associated with the revegetation within the rail corridor; (c) include procedures that would be implemented if there is a fire on-site or in the vicinity of the site; (d) list works that should not be carried out during a total fire ban; (e) include availability of fire suppression equipment, access and water;	Bushfire Emergency Plan document no. 5-0019-220-PMA-00-PL-0065, Rev. 0, dated 1 October 2025 was reviewed as part of this audit and confirmed as unchanged. Compliance with this condition demonstrated as follows: (a) as per section 2 'Requirements, Definitions and Abbreviations' (b) as per section 5 'Bushfire Prevention and Mitigation Measures' (c) as per section 8.2 'Bushfire Emergency Response' (d) as per section 7 'Bushfire Preparedness Actions' (e) as per section 5 'Bushfire Prevention and Mitigation Measures' (f) as per section 5.6 'Hazardous and Flammable Material Storage' (g) as per section 8.4.5 'Emergency Contacts' and section 5.2 'Onsite and Offsite Emergency Provisions' (h) as per section 5.1 'Asset Protection Zones and Vegetation Management' (i) as per section 4 'Bushfire Risks and Hazards' and section 5.6 'Hazardous and Flammable Material Storage' (j) as per section 5.1 'Asset Protection Zones and Vegetation Management'		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(f) include procedures for the storage and maintenance of any flammable materials; (g) detail access provisions for emergency vehicles and contact details for both a primary and alternative site contact who may be reached 24/7 in the event of an emergency; (h) include a figure showing site infrastructure, any Asset Protection Zones and the on-site water supply tank(s); (i) include location of hazards (physical, chemical and electrical) that may impact on fire fighting activities and procedures to manage identified hazards during fire fighting activities; (j) include details of the location, management and maintenance of any Asset Protection Zone (including maintaining the Asset Protection Zones at a height of 100 mm or less at the construction compounds and temporary workforce accommodation facilities) and who is responsible for the maintenance and management of the Asset Protection Zone; (k) include bushfire emergency management planning; (l) include details of the how RFS and FRNSW would be notified, and procedures that would be implemented, in the event that: (i) there is a fire on-site or in the vicinity of the site; (ii) there are any activities on site that would have the potential to ignite surrounding vegetation; or (iii) there are any proposed activities to be carried out during a bushfire danger period	(k) as per section 5 ‘Bushfire prevention and mitigation measures’, section 6 ‘Bushfire awareness’ and section 7.1 ‘Assess Fire Danger and Notify Personnel’ (l) as per section 9.4.2 ‘Incident Notification and Reporting’, appendix D ‘Emergency Management and Evacuation Protocol’ and section 9.4.2.2 ‘Notification to RFS and FRNSW’		

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			that have the potential to ignite surrounding vegetation.			
5.122	E	E122	**Operational Access to be maintained for Bethungra Ranges** The CSSI must be designed and operated to maintain access for an RFS Category 1 fire appliance and any other heavy vehicle as agreed with RFS, to cross the rail corridor to access the Bethungra Ranges in the area south of Dirnaseer Road and east of Ironbong Road. The Proponent must consult with RFS about crossing arrangements to facilitate access and adopt RFS' reasonable recommendations.	Appendix C of the Bushfire Management Plan – comment was raised additional considerations for the Bethungra Range Access. The project closed the comment with the following statement: *"The existing procedural controls during the construction phase are designed to limit the potential for fires to start and spread to these areas without the need for additional construction of trails".*		Compliant
SPOIL MOUNDS						
5.123	E	E123	Permanent spoil mounds are to be located: (a) within the rail corridor; (b) at least 50 metres from any watercourse or culvert or where there is a risk of erosion or flood impacts during any flood event; (c) at least 500 metres from any residence; and (d) outside the drip lines of trees located on private property.	No permanent spoil mounds to date as confirmed by JHG during the audit interview.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			***Note:** For the purpose of **Condition E123(d)**, the Proponent must not affect trees outside of the rail corridor for the purpose of preventing those trees' driplines overhanging spoil mounds.*			
5.124	E	E124	Permanent spoil mounds are to comply with the following requirements: (a) maximum height must not exceed the top height of the upgraded rail line directly parallel to the spoil mound or two metres (whichever is the lesser); (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 following completion of construction of the CSSI.	No permanent spoil mounds to date as confirmed by JHG during the audit interview.		Not Triggered
VISUAL AMENITY AND LANDSCAPE IMPACTS						

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.125	E	E125	The CSSI must be constructed and operated so as to minimise light spillage on residences. All lighting associated with the construction and operation of the CSSI must be consistent with the requirements of Australian Standard 4282-2019 Control of the obtrusive effects of outdoor lighting. Mitigation measures to manage any residual night-lighting impacts to residences must be undertaken in consultation with affected landowners.	Sighted Visual and Landscape Impact Mitigation Plan Rev. B prepared by Conybeare Morrison International, document no. 5-0019-220-PEN-L5-PL-0001_B, dated 20 March 2026. The plan is in draft form. The community consultation was outlined in section 4.3 – a total of 21 landowners were consulted. The plan is under review to address comments raised by IRPL. Sighted Comment Sheet transmittal ref. JH-TRANSMIT-002562, dated 31 March 2026.		Not Triggered
5.126	E	E126	The Proponent must prepare and implement a **Visual and Landscape Impact Mitigation Plan** to mitigate visual and landscape impacts of the CSSI. In preparing the plan, the Proponent must: (a) consult landowners and residents of land zoned RU1 within 500 metres of the CSSI and all landowners and residents of all other land within 100 metres of the CSSI; (b) prepare a landscaping plan for all locations identified in (a) above that specifies plants and trees to be used, with a preference for native vegetation and a program for implementation and ongoing maintenance; (c) document the responses in (a) above and detail how the Plan responds to them.	Sighted Visual and Landscape Impact Mitigation Plan Rev. B prepared by Conybeare Morrison International, document no. 5-0019-220-PEN-L5-PL-0001_B, dated 20 March 2026. The plan is still in draft. The plan is under review to address comments raised by IRPL. Sighted Comment Sheet transmittal ref. JH-TRANSMIT-002562, dated 31 March 2026.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			The Visual and Landscape Impact Mitigation Plan must be made publicly available no later than six (6) months after the commencement of construction of the CSSI.			
HERITAGE						
5.127	E	E127	The Proponent must not destroy, modify or otherwise physically affect any heritage items, including Aboriginal objects or Aboriginal places, outside of the CSSI construction boundary.	JHG confirmed during the audit interview that there was no damage to heritage items.		Compliant
5.128	E	E128	The Proponent must not wilfully harm, modify, or otherwise impact human remains uncovered during the construction of the CSSI. Where identified, remains must be managed through the Unexpected Heritage Finds and Human Remains Procedure required by **Condition E143**.	JHG confirmed during the audit interview that no human remains have been identified to date.		Not Triggered
5.129	E	E129	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 C17**.	Heritage Management Sub-Plan Rev. 0, dated 6 August 2025 continues to be in place as reviewed as part of this audit. Section 9 'Environmental Mitigation and Management Measures' outlines the measures to reduce identified impacts through design and construction.		Compliant
5.130	E	E130	**Aboriginal Cultural Values and Heritage** All reasonable steps must be taken so as not to harm, modify or otherwise impact Aboriginal objects, Aboriginal	Heritage Management Sub-Plan Rev. 0, dated 6 August 2025, Section 9.2 'Protection of Aboriginal sites' and Section 9.8 'Heritage Mitigation and Management		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			values or Aboriginal places except as authorised by this approval.	Measures' outlines the reasonable steps to protect aboriginal cultural values and heritage. Most heritage items have been salvaged and removed from the project footprint, with scar trees located outside the project boundary. JHG confirmed during the audit interview that no advice from a heritage consultant was required during the reporting period. Second Wirajduri Language Session was conducted on 1 April 2026 – sighted calendar invitation. The session was regarding the history of the Wiradjuri people, their culture, and introduction of basics of the Wiradjuri language.		
5.131	E	E131	The Registered Aboriginal Parties (RAPs) must be kept involved in the CSSI in accordance with **Conditions** **B1** and **B2** and the **Aboriginal Community and Stakeholder Engagement Strategy** required by **Condition** **E132**. The RAPs must continue to be provided with regular opportunities to be consulted about the Aboriginal cultural heritage management requirements of the CSSI.	The Aboriginal Community and Stakeholder Engagement Strategy (5-0019-220-PMA-00-ST-0001), Rev. 0, dated 29 July 2025 was reviewed as part of the audit. Section 6 outlines the Aboriginal engagement strategy. Section 2.4 'Aboriginal community consultation for the project' outlines the consultation process.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				Consultation with salvage methodology review during last period which is included in Salvage Methodology. IRPL and JHG advised during the audit interview that salvage occurred December 2025 Sighted email from AOHC (Heritage Consultant), dated 22 January 2026, confirming that the Aboriginal Cultural Values Plan (ACVP) Consultation Log have been updated and sent to the RAPs. No heritage items remaining in the corridor as confirmed during the audit site inspection.		
5.132	E	E132	Prior to the commencement of construction, an **Aboriginal Community and Stakeholder Engagement Strategy** shall be finalised and implemented, in consultation with Heritage NSW, relevant RAPs, and LALCs. The Strategy will detail and include, but not be limited to, the consultation process with Aboriginal stakeholders for the integration of Aboriginal Cultural Values into the CSSI.	The Aboriginal Community and Stakeholder Engagement Strategy (5-0019-220-PMA-00-ST-0001) dated 29 July 2025 was reviewed as part of this audit and confirmed to be unchanged during the audit period. Consultation details are under section 2.4 'Aboriginal community consultation for the project'. The consultation was undertaken with aboriginal stakeholders identified in the Aboriginal Community and Stakeholder Engagement Strategy for the preparation of Aboriginal Cultural Values Plan. Sighted		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				the consultation log confirming the consultation with Cootamundra Working Party, Young LALC, Wagga Wagga LALC, Gulgunya NHAC, Bidya Marra Consultancy, PD Ngunawal Consultancy, Thunderstone Cultural & Land Management Services, Bundyi Cultural Tours, Wingarra Wilay, Yurwang Gundana CHS and Corroboree Aboriginal Corporation.		
5.133	E	E133	**Aboriginal Cultural Values Plan** An **Aboriginal Cultural Values Plan** must be prepared to inform how Aboriginal Cultural Values will be integrated into the broader design of the SSI including design elements (form and fabric), landscaping (the collection, propagation and replanting of traditional plant resources), language; and cultural design principles. The Plan must identify how interpretive themes and cultural values will be implemented and provide a timeframe for their provision during construction. The Plan must recognise the spiritual, intangible, linguistic and cultural values of the sites to Aboriginal people and address the full story of the place (s) (i.e. landscape through the eyes of Aboriginal people); Aboriginal design and story elements, patterns and motifs or other appropriate visual interpretations.	Sighted Aboriginal Cultural Values Plan (ACVP) prepared by Navin Officer Heritage Consultants, Rev. 0, document no. 5-0019-220-PMA-00-PL-0067, dated 23 January 2026. DPHI approval letter of submission timeframe extension of Aboriginal Cultural Values Plan under SSI-9406-PA-44, dated 4 September 2025, was sighted, confirming the extension of submission until 9 November 2025. Sighted submission of ACVP rev. 0 to DPHI, dated 7 November 2025. Sighted post approval receipt SSI-9406-PA-59, dated 7 November 2025. However, the RFI was received from DPHI regarding the		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			The Plan will be developed in conjunction with the **Aboriginal Community and Stakeholder Engagement Strategy**. The Strategy will detail the consultation process with Aboriginal stakeholders and identify the Aboriginal Cultural Values to be incorporated into the design of the CSSI. The **Aboriginal Cultural Values Plan** shall be submitted for the approval of the Planning Secretary one (1) month prior to commencing construction. The **Aboriginal Cultural Values Plan** must be implemented.	information on implementation of interpretive themes & cultural values and consultation with aboriginal stakeholders. The plan was revised (dated 23 January 2026) and submitted to DPHI on 23 January 2026. Sighted post approval receipt SSI-9406-PA-59, dated 23 January 2026. Sighted DPHI approval letter ref. SSI-9406-PA-59, dated 23 February 2026, confirming the approval of Aboriginal Cultural Value Plan Rev. 0, dated 23 January 2026. The methodology used in developing the plan is described in Section 3 “METHODOLOGY” with a description of the consultation workshops held are in Section 5 “WORKSHOP OUTCOMES”. Relevant historical cultural themes are provided in Section 4 “CULTURAL CONTEXT”. Sections 6.5 “DESIGN INPUT” and 6.6 “HERITAGE INTERPRETATION” provide specific commitments relating to heritage interpretation and integration in design. The community engagement methodology used in developing this plan was consistent		

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				with the Aboriginal Community and Stakeholder Engagement Strategy- see section 2.1.3 “Relationship with other documents” and section 3 “METHODOLOGY”.		
5.134	E	E134	Aboriginal cultural heritage artefacts and culturally modified trees that are to be retained within the rail corridor are to be protected during routine maintenance and repair activities during operation in accordance with ARTC’s standard operational environmental management procedures.	This condition will be triggered during operational stage.		Not Triggered
5.135	E	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 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.	Additional Survey and Test Excavation Methodology Rev. 0, dated 29 April 2025. The Additional Survey and Test Excavation Methodology was submitted to DPHI on 10 June 2025 under ref. SSI-9406-PA-17. Prior to ground disturbance works were reviewed as compliant during initial audit. This condition is no longer triggered.		Not Triggered
5.136	E	E136	Following analysis of the test excavation results, the Proponent must prepare and implement an **Aboriginal Archaeological Salvage Excavation Methodology**.	Sighted Aboriginal Archaeological Salvage Excavation Methodology prepared by Apex Archaeology, Rev. 0 final, dated 13 November 2025.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.137	E	E137	Following additional survey, test and salvage excavation, if sites are identified that exceed the expected level of significance identified in the Aboriginal Cultural Heritage Assessment Report, further consultation with Heritage NSW and the RAPs must be undertaken and consideration given, where feasible, for avoidance by the project.	Sighted Aboriginal Archaeological Salvage Excavation Methodology prepared by Apex Archaeology, Rev. 0 final, dated 13 November 2025. Additional Survey and Test Excavation Methodology Rev. 0, dated 29 April 2025. As per the survey and methodology, no exceedances identified. This condition is therefore not triggered as part of this audit.		Not Triggered
5.138	E	E138	The Additional Aboriginal Archaeological Survey Methodology, Aboriginal Archaeological Test Excavation Methodology and Aboriginal Archaeological Salvage Excavation Methodology must be prepared by a suitably qualified expert in consultation with Heritage NSW and RAPs, and provided to the Planning Secretary for information at least one month prior to test or salvage excavation.	Additional Survey and Test Excavation Methodology Rev. 0, dated 29 April 2025, as sighted during initial audit. The methodology was prepared by Apex Archaeology. The Additional Survey and Test Excavation Methodology was submitted to DPHI on 10 June 2025 under ref. SSI-9406-PA-17, as sighted during initial audit. Sighted Aboriginal Archaeological Salvage Excavation Methodology prepared by Apex Archaeology, Rev. 0 final, dated 13 November 2025. Sighted submission to DPHI ref. SSI-9406-PA-56, dated 16 December 2025, providing the Aboriginal Archaeological		Compliant

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				Salvage Excavation Methodology and evidence of consultation email sent to Heritage NSW for the developed methodology. Additionally, the initial version of Aboriginal Archaeological Salvage Excavation Methodology dated October 2025 was uploaded to the major portal for consultation ref. SSI-10055-PA-56, as sighted. This was actioned prior to 1 month of salvage excavation (17 December 2025). Sighted letter from Apex Archaeology, dated 17 December 2025, confirming the completion of salvage excavation within zone 1.		
5.139	E	E139	At the completion of Aboriginal cultural heritage survey and test and salvage excavations, an **Aboriginal Cultural Heritage Excavation Report(s)** must be prepared by a suitably qualified expert. The **Aboriginal Cultural Heritage Excavation Report(s)**, must: (a) be prepared in accordance with the Guide to Investigation, assessing and reporting on Aboriginal cultural heritage in NSW, OEH 2011 and the Code of	The excavation report was not triggered during the audit period.		Not Triggered

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			Practice for Archaeological Investigation of Aboriginal Objects in New South Wales, DECCW 2010; and (b) document the results of the archaeological survey and test excavations and any subsequent salvage excavations (with artefact analysis and identification of a final repository for finds). The RAPs must be given a minimum of 28 days to consider the report and provide comments before the report is finalised. The final report must be provided to the Planning Secretary, Heritage NSW, the relevant Councils, relevant LALCs and the RAPs within 24 months of the completion of the Aboriginal archaeological excavations (both test and salvage).			
5.140	E	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.	Sighted letter from Apex Archaeology, dated 17 December 2025, confirming the completion of salvage excavation within zone 1. A total of 1220 lithic items were recovered from the salvage excavation program. The letter confirms the compliance with E140. Sighted letter from Apex Archaeology, dated 28 January 2026, confirming the completion of salvage excavation across one area within zone 2. A total of 85 lithic items were recovered from the salvage		Compliant

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				excavation program. The letter confirms compliance with E140.		
5.141	E	E141	At the completion of surface collection, test excavations, and salvage excavations, Aboriginal site impact recording forms (ASIRF) must be submitted to the Aboriginal Heritage Information Management System (AHIMS) and evidence provided of submission to the AHIMS Registrar.	AHIMS Web Services Report (Excel Sheet) was provided, dated 2 December 2025, confirming the entries from Inland Rail for Bethungra Crown Land, Ironbong Rd, Olympic Highway, and Burley Griffin Way. Sighted the following Aboriginal Site Impact Recording Forms: • AHIMS Site Id: 63-7-0102, dated 5 March 2026 – Broken Hammer Stone (Artefact) • AHIMS Site Id: 50-5-0312, dated 11 February 2026 - One basalt edge-ground axe and anvil (Artefact) • AHIMS Site Id: 50-5-0311, dated 11 February 2026 - One white quartz flake (Artefact) • AHIMS Site Id: 50-5-0310, dated 11 February 2026 – One broken Hammer Stone / anvil (Artefact)		Compliant
5.142	E	E142	Where previously unidentified Aboriginal objects or Aboriginal Places are discovered, all work must immediately	IRPL and JHG confirmed during the audit interview that there had been no		Not Triggered

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			stop in the vicinity of the affected area. Works potentially affecting the previously unidentified objects or places must not recommence until Heritage NSW has been informed. The measures to consider and manage this process must be specified in the **Unexpected Heritage Finds and Human Remains Procedure** required by **Condition E143** and include registration in the Aboriginal Heritage Information Management System (AHIMS).	unexpected finds during the audit period, and that the identified scar trees are located outside the project boundary. AHIMS Web Services Report (Excel Sheet) was provided, dated 2 December 2025, confirming the entries from Inland Rail for Bethungra Crown Land, Ironbong Rd, Olympic Highway, and Burley Griffin Way.		
5.143	E	E143	**Unexpected Heritage Finds** An **Unexpected Heritage Finds and Human Remains Procedure** must be prepared to manage unexpected heritage finds in accordance with any guidelines and standards prepared by Heritage NSW and submitted to the Planning Secretary for information before the commencement of Work.	Unexpected and Incidental Finds Protocol document no. 5-0019-220-PES-00-PR-0001, Rev. 0, dated 16 December 2024 was prepared as reviewed during the initial audit and verified to be unchanged as part of this audit. Timing of this condition is no longer triggered.		Not Triggered
5.144	E	E144	The **Unexpected Heritage Finds and Human Remains Procedure**, as submitted to the Planning Secretary, must be implemented for the duration of Work. ***Note**: Human remains that are found unexpectedly during the carrying out of Work may be under the jurisdiction of the NSW State Coroner and must be reported to the NSW Police immediately.*	Unexpected and Incidental Finds Protocol document no. 5-0019-220-PES-00-PR-0001, Rev. 0, dated 16 December 2024 as reviewed as part of this audit. IRPL and JHG confirmed during the audit interview that there had been no unexpected finds during the audit period.		Compliant

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LAND USE AND PROPERTY						
5.145	E	E145	**Condition Surveys and Rectification** 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. 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.	The following conditions reports were actioned during the previous audit period: • Illabo to Stockinbingal Road Condition Report Rev. B, dated 29 July 2025. • Pre-Construction Condition Survey for Billabong 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. • Pre-Construction Condition Survey for Access via 3A Cambria Street, dated 24 June 2025. Refer to the close out of the non-compliance raised at the previous IEA (reference I2S-01_NC-02). Compliance and timing of this condition is no longer triggered; however, upon review of the close out documentation to address the previous non-compliance, an improvement opportunity was identified to update the register used for tracking the status of condition surveys.	**Opportunity for Improvement** **I2S-02_OFI-06:** During the review of Condition Survey Register, it was identified that some cells were marked as red and some entries left blank. Although evidence was presented demonstrating surveys were submitted prior to commencement of construction, the register itself does not record the date of submission of condition surveys to landowners and agencies. It is recommended that the register be reviewed and updated	Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
					to ensure all fields are completed accurately, submission statuses are clearly defined, and relevant submission dates are captured.	
5.146	E	E146	After completion of construction, condition surveys of all items for which condition surveys were undertaken in accordance with **Condition E145** of this approval must be undertaken by a structural engineer. The results of the surveys must be documented in a **Condition Survey Report** for each item surveyed. Copies of **Condition Survey Reports** must be provided to the landowners of the items surveyed, and no later than three (3) months following the completion of construction.	This condition will be triggered upon completion of construction.		Not Triggered
5.147	E	E147	The Proponent, where liable, must rectify any property damage caused directly or indirectly (for example from vibration or from groundwater change) by the construction or operation at no cost to the owner. Alternatively, the Proponent may pay compensation for the property damage as agreed with the property owner.	This condition will be triggered for any damage or rectification to properties. This condition was not triggered during the audit period.		Not Triggered
SUSTAINABILITY						
5.148	E	E148	The CSSI must achieve a minimum ‘excellent’ rating for both ‘Design’ and ‘As built’ civil works, under the Infrastructure	IRPL confirmed during the audit interview that the first round of submission is		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Sustainability Council of Australia infrastructure rating tool, or through the use of an equivalent process or an equivalent level of performance using a demonstrated equivalent rating tool. Evidence that these ratings have been achieved must be published on the proponent's website: (a) within 12 months of commencing Construction for the 'Design' rating; and (b) within 12 months of commencing of Operation for the 'As built' rating.	currently being prepared (half-way through). IS Rating as per ISC – score card to determine rating outcome. Tracking spreadsheet developed – I2S KRA tracker presented as evidence showing Round 1 Certainty column (50%, 75%, 90%). JHG shared during the audit interview sustainability initiatives for innovation credits onsite include the development of ecology enhancements e.g., nest boxes (as per fauna connectivity strategy) – ECO2 credits; poly-line installation; reuse of water through treatment plant (still a work in progress). This condition is not yet triggered.		
5.149	E	E149	A **Water Reuse Strategy** must be prepared, which sets out options for the reuse of collected stormwater and groundwater during construction. The **Water Reuse Strategy** must include, but not be limited to: (a) evaluation of reuse options; (b) details of the preferred reuse option(s), including volumes of water to be reused, proposed reuse locations and/or activities, proposed treatment (if required), and any additional licences or approvals that may be required;	Water Re-use Strategy Rev. 0, dated 18 September 2025 as reviewed as part of this audit. Compliance with this condition demonstrated as follows: (a) as per section 6.3 'Water Reuse Options Summary' (b) as per section 7 'Water Reuse and Reduction Strategies' (c) as per section 7 'Water Reuse and Reduction Strategies'		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(c) measures to avoid misuse of recycled water as potable water; (d) consideration of the public health risks from water recycling; and (e) a time frame for the implementation of the preferred reuse option(s). The **Water Reuse Strategy** must be prepared based on best practice and advice sought from relevant agencies, as required. The Strategy must be applied during construction and operation. Justification must be provided to the Planning Secretary if it is concluded that no reuse options prevail. The **Water Reuse Strategy** must be implemented and published on the project website. ***Note****: Nothing in this condition prevents the Proponent from preparing separate* ***Water Reuse Strategies*** *for the construction and operational phases of the CSSI.*	(d) as per section 6.4 'Consideration of the Public Health Risks' (e) as per section 6 'Water Sources and Reuse Options' and section 7.1 'Water Reduction Strategies' The Water Re-use Strategy was noted to be available on the project website. JHG noted during the audit interview that there have been no discharges to date; no discharge points. Currently applying for EPL variation to include discharge points. All water is contained and reused onsite. No overtopping from rain events to date. Potable water tested by utility company for relocation of testing line at Old Cootamundra Rd – hydro static testing of the main, discharged from water line, pumped into turkeys nest and then reused for dust suppression. Goldenfields Council is the water supplier. No licence requirements for connection to the mains. Water use is metered. Feedback as discussed from DCCEEW. Annual reporting – timing not yet triggered. JHG noted that Water Reuse Strategy contains water supply requirements; no		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				water extraction occurring; water metering under framework not applicable; no water access license.		
SOILS						
5.150	E	E150	Erosion and sediment controls must be installed and maintained, as a minimum, in accordance with the publication *Managing Urban Stormwater: Soils & Construction* (4th edition, Landcom 2004) commonly referred to as the ‘Blue Book’.	Sighted Progressive Erosion and Sediment Control Plan – Billabong Creek, Rev. C, dated 11 April 2026. The plan was approved by CPESC 7317. Sighted Progressive Erosion and Sediment Control Plan – Ironbong Road, Rev. A, dated 1 April 2026. The plan was approved by CPESC 7317. Sighted Erosion and Sediment Control Audit Report prepared by Treestone Environmental, dated 10 April 2026, confirming that the site is achieving a compliant level of erosion and sediment control, with ongoing maintenance and targeted improvements required to ensure continued performance and minimise environmental risk. Erosion and sediment controls appeared to be generally implemented and adequately maintained during the audit, with some		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				items raised. Refer to site inspection photos including observations.		
CONTAMINATION						
5.151	E	E151	**Role of Site Auditor** A **Site Auditor**(s) must be engaged before the commencement of contamination investigations until the completion of construction to ensure contamination is appropriately managed. The **Site Auditor** is to review all documentation relevant to contamination, including previous site audits, and provide a written opinion on the contamination risk and the appropriateness of the reports and any proposed management measures of the site, including (but not limited to): (a) the management and monitoring plans in **Conditions C12** and **C17**, where relevant, including any updates or amendments to those plans; (b) Sampling and Analysis Quality Plan in **Condition E154**; (c) Detailed Site Investigation Report(s) in **Condition E155**; (d) Remedial Action Plans in **Condition E156**; (e) **Unexpected Finds Procedure for Contamination** in **Condition E161**; and (f) Post-remediation validation reports.	Envirocene continues to be engaged as the site auditor. Sighted Interim Audit Advice No. 3 for DSI AEC 11, dated 11 March 2026, confirming the review of Detailed Site Investigation (DSI) Rev. 4 prepared by McMahon. The review confirms that the DSI is appropriate.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.152	E	E152	All recommendations made by the **Site Auditor** must be implemented before commencing work (other than intrusive work conducted as part of detailed site investigations) that could result in any disturbance of any land identified as an area of potential contamination.	Sighted Interim Audit Advice No. 3 for DSI AEC 11, dated 11 March 2026, confirming the review of DSI Rev. 4 prepared by McMahon. The review confirms that the DSI is appropriate.		Compliant
5.153	E	E153	Evidence that a **Site Auditor** has reviewed each of the required plans and reports listed in **Condition E151**, and has issued an interim audit advice or a relevant **Site Audit Statement** regarding the appropriateness of those plans or reports must be appended to those plans or reports. ***Note:*** *Any associated Site Auditor report, or* ***interim audit advice*** *or a relevant* ***Site Audit Statement*** *must made publicly available in accordance with* ***Condition B18****.*	Sighted Interim Audit Advice No. 3 for DSI AEC 11, dated 11 March 2026, confirming the review of DSI Rev. 4 prepared by McMahon. The review confirms that the DSI is appropriate. However, DSI rev. 4, dated 2 March 2026, is still in draft and currently with IRPL for review and endorsement. The interim audit advice will be documented in DSI.		Not Triggered
5.154	E	E154	**Contamination Investigations** **A Sampling and Analysis Quality Plan** (SAQP) must be completed prior to **Detailed Site Investigations** being undertaken. The SAQP must: (a) be prepared by a suitably qualified and experienced contaminated land consultant(s) in accordance with the relevant guidelines made or approved by the EPA under section 105 of the *Contaminated Land Management Act 1997* (CLM Act);	Sampling and Analysis Quality Plan Rev. V3, dated 30 July 2025. SAQP has been prepared by David McMahon, a competent and experienced contaminated land professional as per Schedule B9 of the National Environment Protection (Assessment of Site Contamination) Measure 1999 (amended 2013). Compliance with this condition was reviewed during previous audit, with the		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(b) be prepared where construction or land disturbing activity is to be undertaken, on sites identified as for medium to high risk sites as identified in the documents referred to in **Condition A1**, to ensure that field investigations and analyses will be undertaken in a way that enables the collection and reporting of reliable including (where applicable) the relevant site characterisation requirements of the detailed or targeted site investigations; and (c) inform the development of **Detailed Site Investigations**.	SAQP actioned prior to the DSI (currently Rev 4 dated 2 March 2026.		
5.155	E	E155	Detailed Site Investigations (DSI) must: (a) be undertaken by a suitably qualified and experienced contaminated land consultant(s); (b) be prepared in accordance with the relevant guidelines made or approved by the EPA under section 105 of the CLM Act; (c) be undertaken before the commencement of work that would result in any disturbance of land identified as moderate to high risk areas of potential contamination in the relevant documents in **Condition A1** or as updated by **Condition E152**; (d) determine the nature and extent of contamination in soil, groundwater, surface water, ground gases and sediments (where applicable); (e) consider whether contamination has the potential to pose an unacceptable risk to human health or the environment on or off-site;	Detailed Site Investigations are still ongoing and have not yet been finalised. The current DSI revision is Rev. 4 dated 2 March 2026. Review and endorsement still to occur by IRPL. Two DSIs will be required: 1. AEC 1 and 2 Stockinbingal Railyard 2. AEC 11 – unexpected finds location (refer to screenshot) IAA No. 3 confirms review of DSI for AEC 11.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(f) include recommendations for further investigations, remediation and/or management of contamination; (g) be prepared in accordance with the land use criteria applicable to the final land use at the opening of the CSSI; (h) be reviewed by the accredited Site Auditor with the intent of issuing Interim Audit Advice commenting on the adequacy of the report; and (i) be provided to the Planning Secretary upon request, along any associated Site Auditor's Advice. ***Notes:*** *1. This condition does not prevent disturbance to land that is required to complete the Detailed Site Investigations.* *2. The intention of this condition is to require Detailed Site Investigations of locations identified as an area of potential contamination to be completed before any form of excavation, including the use of hand tools, exposes soil. This will minimise risks to human health and/or the environment.* *3. Detailed Site Investigation Reports must made publicly available in accordance with Condition B18.* *4. Nothing in this condition prevents the preparation of individual Detailed Site Investigation Reports for separate contaminated sites.* *5. Any recommendations made in the Detailed Site Investigation Report for changes to management measures in the CEMP sub-plan(s) must be incorporated into the relevant subplan required by Condition C17, unless otherwise approved by the Planning Secretary.*	This condition was not triggered at the time of the audit and will be reviewed as part of the next IEA.		
5.156	E	E156	**Remediation** Where remediation is required to make land suitable for the final intended land use, a **Remedial Action Plan** must:	Detailed Site Investigations are still ongoing and have not yet been finalised. No significant contamination has been		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(a) be undertaken by a suitably qualified and experienced contaminated land consultant(s); (b) be prepared in accordance with relevant guidelines made or approved by the EPA under section 105 of the CLM Act; (c) outline remediation options to address the contamination and the final chosen remediation methodology to make the land suitable for the final intended land use; (d) be reviewed by the accredited Site Auditor with the intent of issuing interim audit advice commenting on the adequacy of the report; and (e) be provided to the Planning Secretary upon request, along with any associated Site Auditor's advice. ***Note:** Nothing in this condition prevents the preparation of individual **Remedial Action Plans** for separate contaminated areas within the project footprint.*	identified; therefore, no remediation is required at this stage.		
5.157	E	E157	**Site Audit Statement(s)** Before commencing remediation, a **Section B Site Audit Statement(s)** or an interim audit advice must be prepared by a **Site Auditor** that certifies that the **Remedial Action Plan** is appropriate and that the site can be made suitable for the proposed use. The **Remedial Action Plan** must be implemented and any changes to the **Remedial Action Plan** must be approved in writing by the **Site Auditor**.	Based on the evidence presented in preceding conditions, remediation is yet to occur. This condition is not yet triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			Note: *Nothing in this condition prevents the Proponent from engaging the Site Auditor to prepare Site Audit Statements for separate contaminated sites.*			
5.158	E	E158	For any land identified as an area of moderate or high potential contamination risk, a **Section A1 Site Audit Statement** or **A2 Site Audit Statement** (accompanied by an Environmental Management Plan) and a **Site Audit Report** must be prepared which states that the contaminated land disturbed by the work has been made suitable for the intended land use. The **Site Audit Statement and Site Audit Report** must be provided to the relevant council after remediation and no later than before the commencement of operation of the CSSI. ***Notes:*** 1. *Nothing in this condition prevents the Proponent from obtaining* ***Section A Site Audit Statements*** *for individual parcels of remediated land.* 2. *As required by* ***Condition E153***, ***interim audit advice*** *may be provided prior to a final* ***Site Audit Statement and Site Audit Report.*** 3. *Any associated* ***Site Auditor Report****, or* ***interim audit advice*** *or a relevant* ***Site Audit Statement*** *must made publicly available in accordance with* ***Condition B18****.*	Based on the evidence presented in preceding conditions no significant contamination has been identified. This condition is not yet triggered.		Not Triggered

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.159	E	E159	Contaminated land must not be used for the purpose approved under the terms of this approval until a **Section A1** or **A2 Site Audit Statement** is obtained which states that the land is suitable for that purpose and any conditions on the **Section A Site Audit Statement** have been complied with.	Based on the evidence presented in preceding conditions no significant contamination has been identified, with no remediation or clearance certificates required. This condition is not yet triggered.		Not Triggered
5.160	E	E160	Where required, any recommendations to minimise risk to human health or the environment or for the management of contamination arising, the Site Auditor's review, advice or audits must be incorporated into the relevant **CEMP subplan** and implemented.	One Interim Audit Advice (No. 3) was issued during the audit period; however, this was relevant to the review of the DSI with no additional risk or contamination of note. This condition is not yet triggered.		Not Triggered
5.161	E	E161	**Unexpected Finds** An Unexpected Finds Procedure for Contamination must: (a) be prepared prior to the commencement of Work and must be followed should unexpected contamination or asbestos (or suspected contamination) be excavated or otherwise discovered; (b) include details of who will be responsible for implementing the unexpected finds procedure and the roles and responsibilities of all parties involved; (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;	Unexpected and Incidental Finds Protocol document no. 5-0019-220-PES-00-PR-0001, Rev. 0, dated 16 December 2024. Appendix C – Unexpected Finds Procedure – Contamination, as reviewed during the audit and verified as unchanged during the audit period. Implementation of the procedure is as per section 4 'Implementation' which includes training and roles and responsibilities. Unexpected find advised by JHG email as sighted, dated 15 April 2026 as issued to IRPL and the ER. Testing has occurred		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(d) be provided to the Planning Secretary and the EPA upon request with a copy of the **interim audit advice** or **Section B Site Audit Statement** attached; and (e) be implemented throughout work.	with plans to remove (not yet actioned at the time of the audit). Sighted Analytical Report from SGS, dated 17 April 2026, ref. SE300646 R0, confirming the detection of Amosite & Chrysotile Asbestos in cement sheet fragments. Sighted Analytical Report from SGS, dated 12 April 2026, ref. SE300866 R0, confirming the detection of Amosite & Chrysotile Asbestos in cement sheet fragments.		
AIR QUALITY						
5.162	E	E162	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, odour and other air pollutants during the construction and operation of the CSSI.	Site inspection confirmed large water carts operational on site throughout the alignment (refer to photos). Additionally, all site access areas are stabilised to reduce dust.		Compliant
WASTE						
5.163	E	E163	Waste generated during construction and operation is to be dealt with in accordance with the following priorities:	Waste Management Plan document no. 5-0019-220-PMA-00-PL-0071, Rev. 0, dated 14 August 2025 was provided as part of	**Opportunity for Improvement**	Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(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 in accordance with **Condition E165**.	this audit. Section 4 "Waste Management' describes the management measures to reduce waste, reuse or recycled waste and disposal process. JHG confirmed during the audit interview that no material has been taken to a facility during the audit period. Only cut to fill + general waste is being removed. Cleanaway is still used as the waste contractor. Sighted Cleanaway Waste Report Register with the entry on 1 December 2025 for Burley Griffin Site – invoice # 15221246.	**I2S-02_OFI-07:** The current waste tracking register does not distinguish between recycled and landfilled waste streams, limiting the ability to demonstrate waste diversion performance. While waste segregation bins were observed onsite during site inspection. It is recommended that a monthly waste report be obtained from the contractor, clearly outlining the proportion of waste recycled versus landfilled, to effectively demonstrate waste performance and support sustainability reporting requirements, including ISC outcomes.	

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
5.164	E	E164	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.	JHG confirmed during the audit interview that there has been no importation of waste material to date.		Not Triggered
5.165	E	E165	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 site meeting applicable legislation and regulations, 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.*	Cleanaway continues to be engaged for waste & recycling services as per evidence presented. Cleanaway is EPA approved with license number 12945. JHG advised that no materials are currently being transported offsite. The BSA is technically not part of the JHG site, but forms part of the IRPL site. DPHI and CHPR have requested the reuse of logs within the BSI. Sighted Material Tracking Register – Crushed rock usage on site was 565.50 tonnes in December 2025.	**Opportunity for Improvement** **I2S-02_OFI-08:** No waste was exported or transported offsite under a Resource Recovery Order in relation to vegetation clearing activities. Instead, cleared vegetation (e.g. logs and mulch) is being reused onsite, indicating positive resource recovery practices. However, the project did not capture or maintain quantitative	Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
					records relating to the volumes of logs and mulch reused onsite. It is recommended that, for future vegetation clearing activities, processes are implemented to record the data of logs and mulch for reuse opportunities.	
5.166	E	E166	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.	Sighted Analytical Report from SGS for the unexpected find, dated 17 April 2026, ref. SE300646 R0, confirming the detection of Amosite & Chrysotile Asbestos in cement sheet fragments. Sighted Analytical Report from SGS for the unexpected find, dated 12 April 2026, ref. SE300866 R0, confirming the detection of Amosite & Chrysotile Asbestos in cement sheet fragments. The asbestos removal works had not commenced at the time of inspection as advised by JHG.		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
APPENDIX A - WRITTEN INCIDENT NOTIFICATION AND REPORTING REQUIREMENTS						
5.167	APPX A	1.	A written incident notification addressing the requirements set out below must be submitted to the Department via the Major Projects website within seven (7) days after the Proponent becomes aware of an incident. Notification is required to be given under this condition even if the Proponent fails to give the notification required under **Condition A34** or, having given such notification, subsequently forms the view that an incident has not occurred.	The incident was initially reported verbally to DPHI on 3 December 2025, followed by formal notification on 5 December 2025 via Aconex ref: IR2200-RECCO-000078 in accordance with the Unexpected and Incidental Finds Procedure. Sighted notification letter ref: 6-0000-220-EEC-00-LT-0056, dated 5 December 2025. Additionally, sighted post-approval receipt SSI-9406-PA-67,dated 5 December 2025. Sighted email from JHG, dated 15 December 2025, confirming that the DPHI categorised/initiated it as a notifiable incident. Sighted incident notification to DPHI dated 19 December 2025, submitted as a notifiable incident.		Compliant
5.168	APPX A	2.	Written notification of an incident must: (a) identify the CSSI and application number; (b) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); (c) identify how the incident was detected; (d) identify when the Proponent became aware of the incident;	Sighted incident notification to DPHI dated 19 December 2025, submitted as a notifiable incident. The notification included all the required information including details of the incident, implementation of mitigation measures, and further actions being undertaken. It also noted that the		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			(e) identify any actual or potential non-compliance with conditions of approval; (f) describe what immediate steps were taken in relation to the incident; (g) identify further action that will be taken in relation to the incident; and (h) identify a project contact for further communication regarding the incident.	fledgling Superb Parrots were uninjured and, following care and assessment by a licensed wildlife carer, were successfully released on 11 December 2025.		
5.169	APPX A	3	Within 7 days of the date on which the incident occurred or as otherwise agreed to by the Planning Secretary, the Proponent must provide the Planning Secretary and any relevant public authorities (as determined by the Planning Secretary) with a detailed report on the incident addressing all requirements below, and such further reports as may be requested.	The incident was initially reported verbally to DPHI on 3 December 2025, followed by formal notification on 5 December 2025 via Aconex ref: IR2200-RECCO-000078 in accordance with the Unexpected and Incidental Finds Procedure. Sighted notification letter ref: 6-0000-220-EEC-00-LT-0056, dated 5 December 2025. Additionally, sighted post-approval receipt SSI-9406-PA-67,dated 5 December 2025. Sighted email from JHG, dated 15 December 2025, confirming that the DPHI categorised/initiated it as a notifiable incident. Sighted incident notification to DPHI dated 19 December 2025, submitted as a notifiable incident. The notification included all the required information including details of the incident, implementation of		Compliant

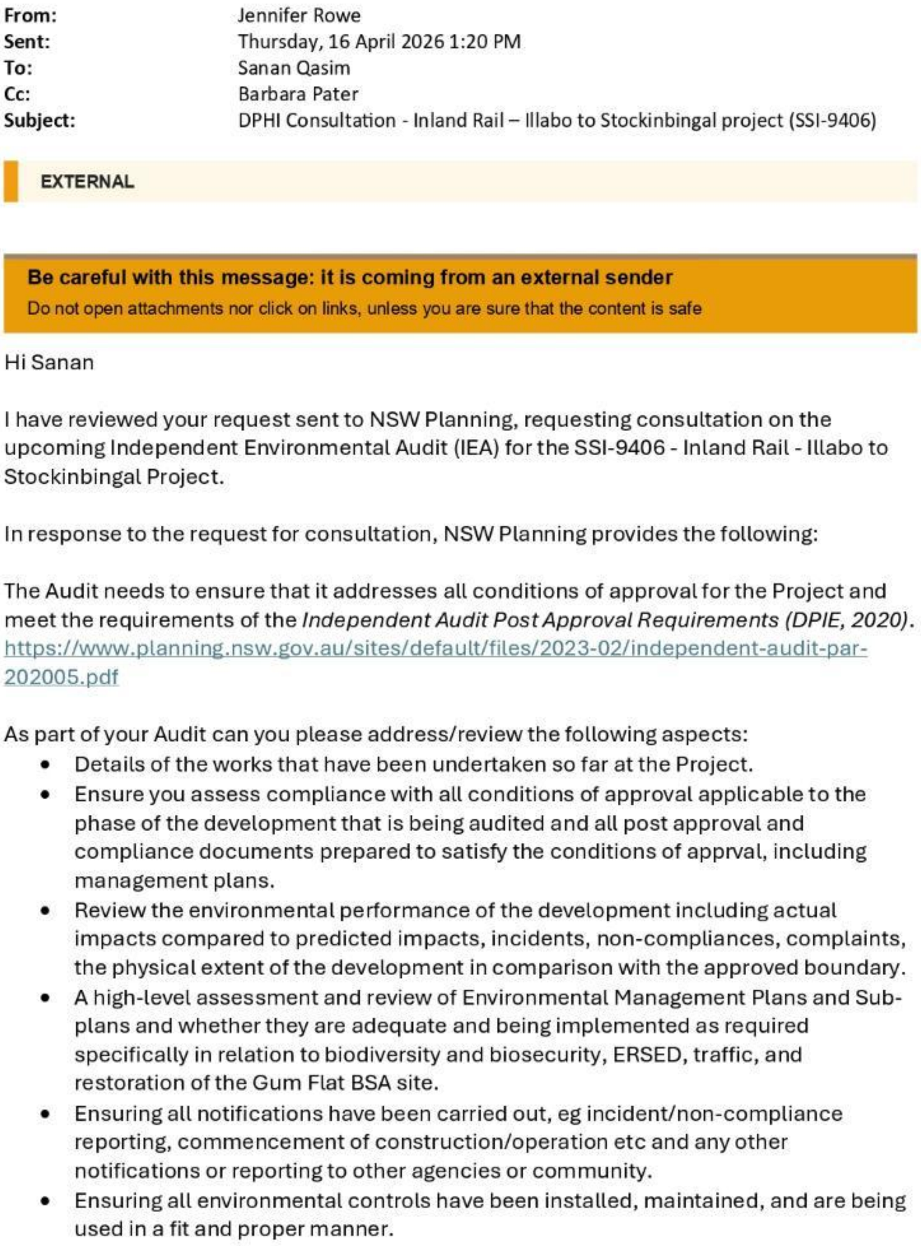
ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				mitigation measures, and further actions being undertaken. Sighted RFI letter from DPHI ref. SSI-9406-PA-67, dated 14 January 2026, requesting the detailed investigation report by 30 January 2026. Sighted email from DPHI, dated 29 January 2026, confirming the extension of submission of investigation report by 4 February 2026. Sighted IRPL Response to DPHI's RFI request, dated 4 February 2026. The response includes the details of the investigation conducted by IR. The primary cause of the incident was the delay in schedule and preclearance survey being conducted outside of the Superb Parrot breeding season, and management of change associated with that delay.		
5.170	APPX A	4.	The Incident Report must include: (a) a summary of the incident; (b) outcomes of an incident investigation, including identification of the cause of the incident; (c) details of the corrective and preventative actions that have been, or will be, implemented to address the incident and prevent recurrence; and (d) details of any communication with other stakeholders	Sighted IRPL Response to DPHI's RFI request, dated 4 February 2026. The response includes the details of the investigation conducted by IRPL including all the required information as per APPX A. The primary cause of the incident was the delay in schedule and preclearance survey		Compliant

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
			regarding the incident.	being conducted outside of the Superb Parrot breeding season, and management of change associated with that delay. (a) In December 2025 as part of site establishment (clearing & grubbing) works, tree removal has been undertaken at an I2S site located north of Dirnaseer Road within the Junee Shire Council area of NSW. During this activity and the removal of a hollow bearing tree on the 2 December 2025, three (3) Superb Parrot fledglings were identified following felling of that tree. (b) The primary cause of the incident was the delay in schedule and preclearance survey being conducted outside of the Superb Parrot breeding season, and management of change associated with that delay (c) Details of immediate corrective and preventive actions addressed including stop clearing work, Ecologist's observations at dusk, and use of pole mounted cameras for investigation etc.		

ID No.	CSSI Part	Req. No.	SSI-9406 Requirement	Audit Evidence	Audit Findings / Recommendations	Compliance Rating
				(d) Communications with other stakeholders include: • Commonwealth DCCEEW notifications as required by EPBC 2018/8233 on the 4th of December 2025 and 17th December 2025 • DCCEEW NSW (CHPR) notifications on the 5th of December 2025 and 19th of December 2025.		

Appendix F – Consultation

DPHI:



From:	Jennifer Rowe
Sent:	Thursday, 16 April 2026 1:20 PM
To:	Sanan Qasim
Cc:	Barbara Pater
Subject:	DPHI Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

EXTERNAL

Be careful with this message: it is coming from an external sender

Do not open attachments nor click on links, unless you are sure that the content is safe

Hi Sanan

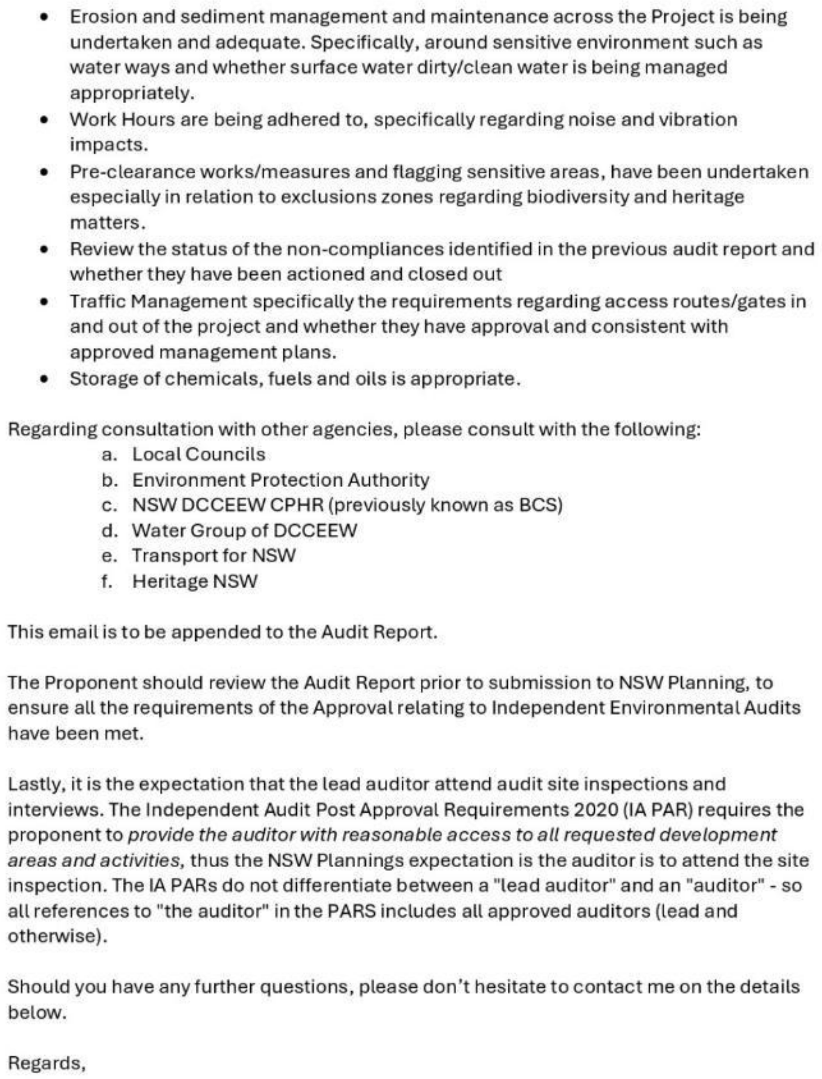
I have reviewed your request sent to NSW Planning, requesting consultation on the upcoming Independent Environmental Audit (IEA) for the SSI-9406 - Inland Rail - Illabo to Stockinbingal Project.

In response to the request for consultation, NSW Planning provides the following:

The Audit needs to ensure that it addresses all conditions of approval for the Project and meet the requirements of the *Independent Audit Post Approval Requirements (DPIE, 2020)*. https://www.planning.nsw.gov.au/sites/default/files/2023-02/independent-audit-par-202005.pdf

As part of your Audit can you please address/review the following aspects:

- Details of the works that have been undertaken so far at the Project.
- Ensure you assess compliance with all conditions of approval applicable to the phase of the development that is being audited and all post approval and compliance documents prepared to satisfy the conditions of apprval, including management plans.
- Review the environmental performance of the development including actual impacts compared to predicted impacts, incidents, non-compliances, complaints, the physical extent of the development in comparison with the approved boundary.
- A high-level assessment and review of Environmental Management Plans and Sub-plans and whether they are adequate and being implemented as required specifically in relation to biodiversity and biosecurity, ERSED, traffic, and restoration of the Gum Flat BSA site.
- Ensuring all notifications have been carried out, eg incident/non-compliance reporting, commencement of construction/operation etc and any other notifications or reporting to other agencies or community.
- Ensuring all environmental controls have been installed, maintained, and are being used in a fit and proper manner.



- Erosion and sediment management and maintenance across the Project is being undertaken and adequate. Specifically, around sensitive environment such as water ways and whether surface water dirty/clean water is being managed appropriately.
- Work Hours are being adhered to, specifically regarding noise and vibration impacts.
- Pre-clearance works/measures and flagging sensitive areas, have been undertaken especially in relation to exclusions zones regarding biodiversity and heritage matters.
- Review the status of the non-compliances identified in the previous audit report and whether they have been actioned and closed out
- Traffic Management specifically the requirements regarding access routes/gates in and out of the project and whether they have approval and consistent with approved management plans.
- Storage of chemicals, fuels and oils is appropriate.

Regarding consultation with other agencies, please consult with the following:

a. Local Councils
b. Environment Protection Authority
c. NSW DCCEEW CPHR (previously known as BCS)
d. Water Group of DCCEEW
e. Transport for NSW
f. Heritage NSW

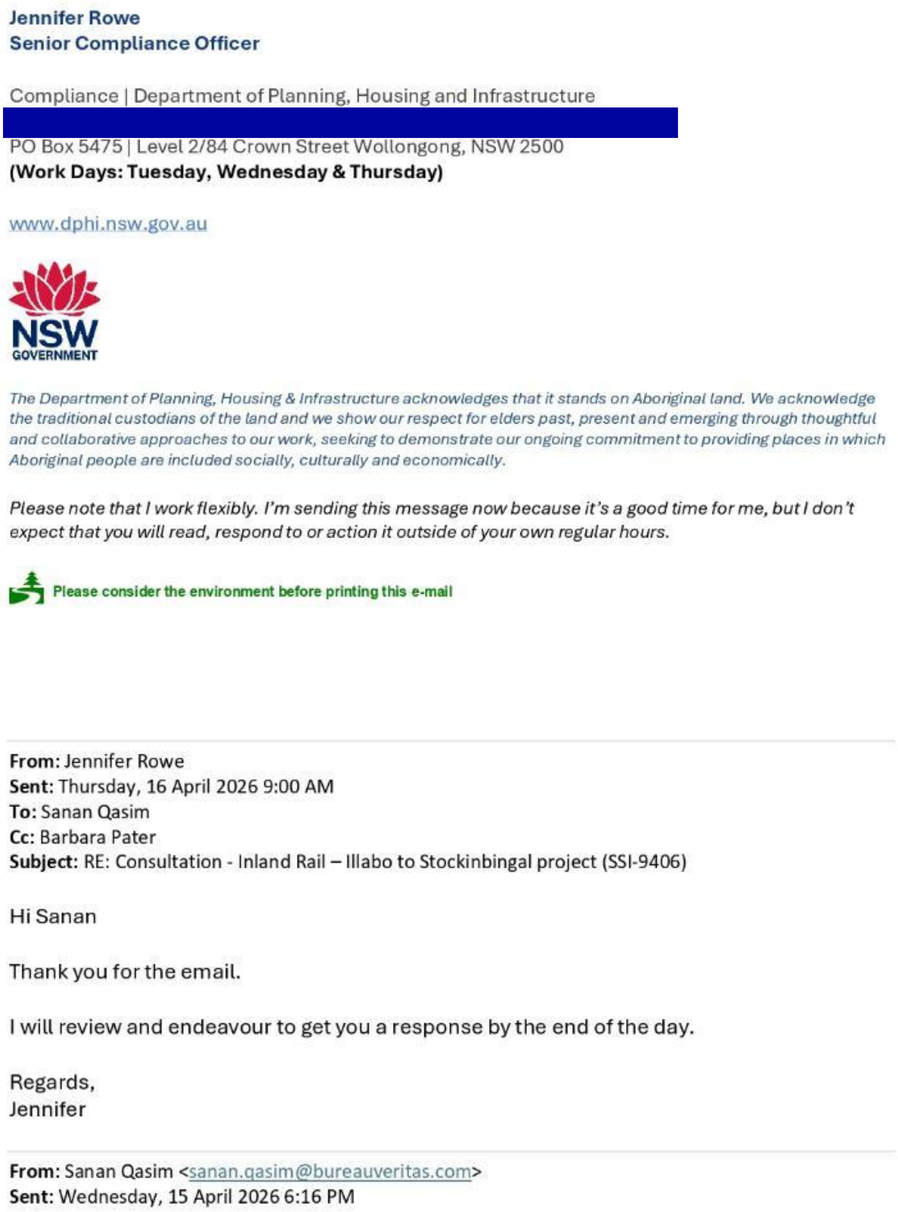
This email is to be appended to the Audit Report.

The Proponent should review the Audit Report prior to submission to NSW Planning, to ensure all the requirements of the Approval relating to Independent Environmental Audits have been met.

Lastly, it is the expectation that the lead auditor attend audit site inspections and interviews. The Independent Audit Post Approval Requirements 2020 (IA PAR) requires the proponent to *provide the auditor with reasonable access to all requested development areas and activities*, thus the NSW Plannings expectation is the auditor is to attend the site inspection. The IA PARs do not differentiate between a "lead auditor" and an "auditor" - so all references to "the auditor" in the PARS includes all approved auditors (lead and otherwise).

Should you have any further questions, please don't hesitate to contact me on the details below.

Regards,



Jennifer Rowe
Senior Compliance Officer

Compliance | Department of Planning, Housing and Infrastructure
[redacted]
PO Box 5475 | Level 2/84 Crown Street Wollongong, NSW 2500
(Work Days: Tuesday, Wednesday & Thursday)

www.dphi.nsw.gov.au

The Department of Planning, Housing & Infrastructure acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

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.

Please consider the environment before printing this e-mail

From: Jennifer Rowe
Sent: Thursday, 16 April 2026 9:00 AM
To: Sanan Qasim
Cc: Barbara Pater
Subject: RE: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

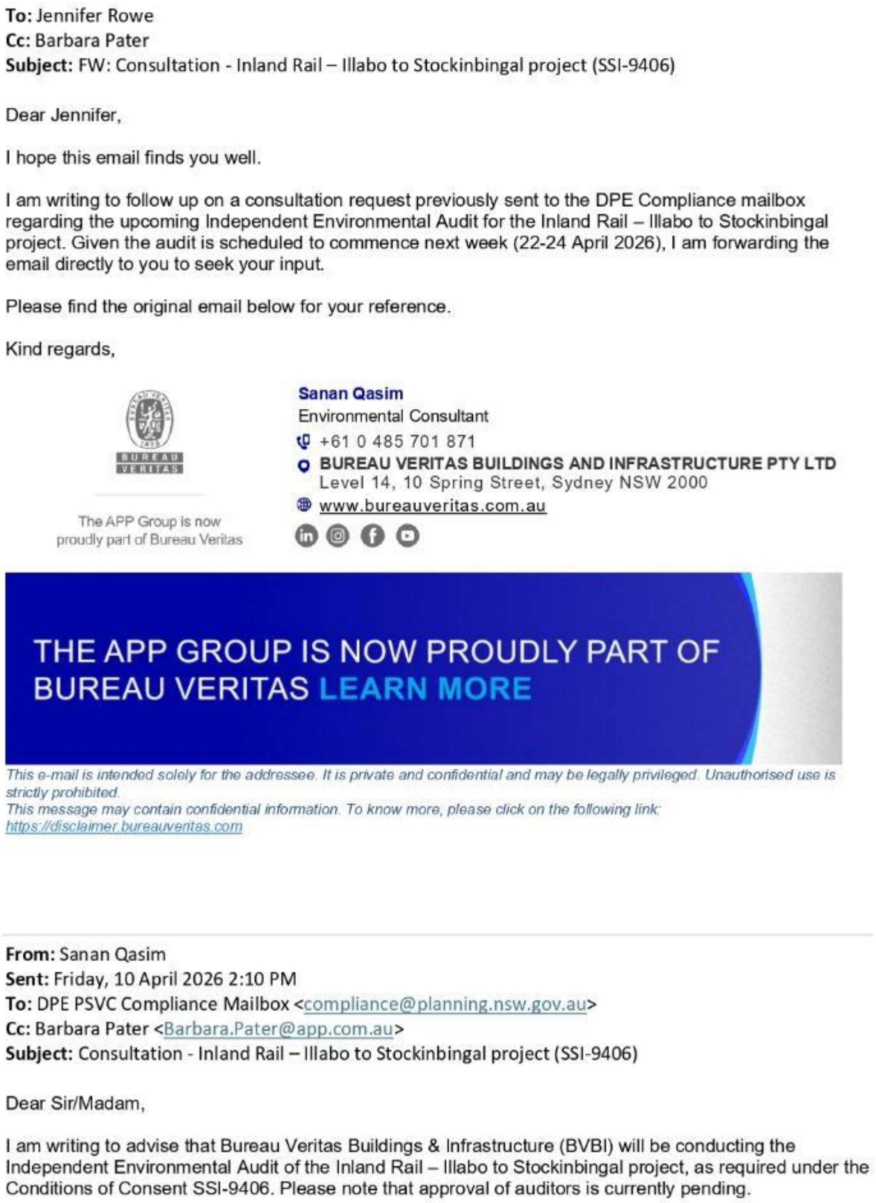
Hi Sanan

Thank you for the email.

I will review and endeavour to get you a response by the end of the day.

Regards,
Jennifer

From: Sanan Qasim <sanan.qasim@bureauveritas.com>
Sent: Wednesday, 15 April 2026 6:16 PM



To: Jennifer Rowe
Cc: Barbara Pater
Subject: FW: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

Dear Jennifer,

I hope this email finds you well.

I am writing to follow up on a consultation request previously sent to the DPE Compliance mailbox regarding the upcoming Independent Environmental Audit for the Inland Rail – Illabo to Stockinbingal project. Given the audit is scheduled to commence next week (22-24 April 2026), I am forwarding the email directly to you to seek your input.

Please find the original email below for your reference.

Kind regards,

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Sanan Qasim
Environmental Consultant
☎ +61 0 485 701 871
BUREAU VERITAS BUILDINGS AND INFRASTRUCTURE PTY LTD
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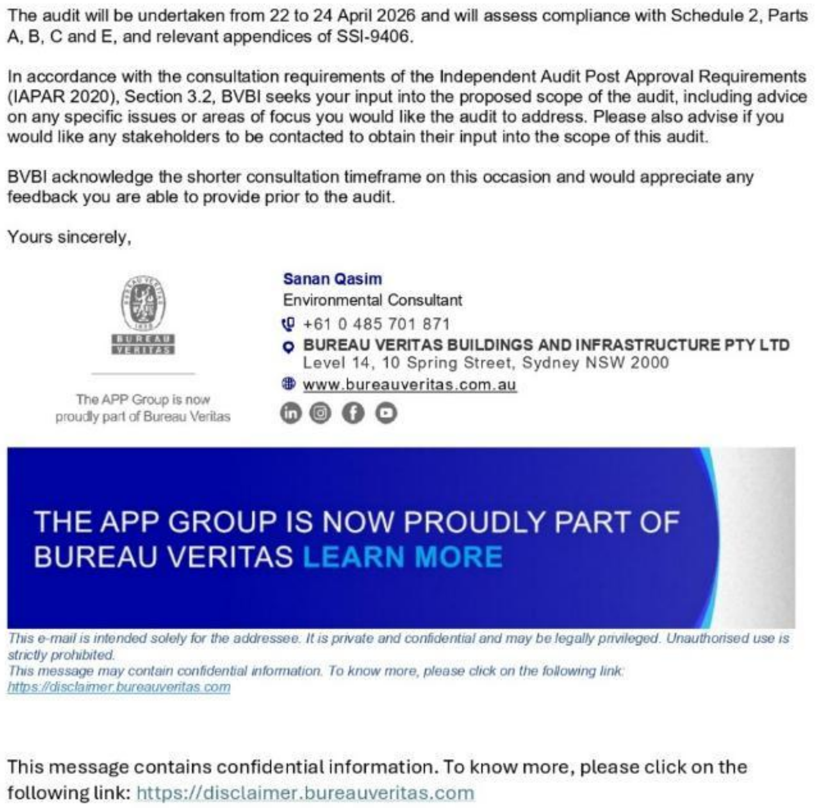
---

From: Sanan Qasim
Sent: Friday, 10 April 2026 2:10 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Barbara Pater <Barbara.Pater@app.com.au>
Subject: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

Dear Sir/Madam,

I am writing to advise that Bureau Veritas Buildings & Infrastructure (BVBI) will be conducting the Independent Environmental Audit of the Inland Rail – Illabo to Stockinbingal project, as required under the Conditions of Consent SSI-9406. Please note that approval of auditors is currently pending.



The audit will be undertaken from 22 to 24 April 2026 and will assess compliance with Schedule 2, Parts A, B, C and E, and relevant appendices of SSI-9406.

In accordance with the consultation requirements of the Independent Audit Post Approval Requirements (IAPAR 2020), Section 3.2, BVBI seeks your input into the proposed scope of the audit, including advice on any specific issues or areas of focus you would like the audit to address. Please also advise if you would like any stakeholders to be contacted to obtain their input into the scope of this audit.

BVBI acknowledge the shorter consultation timeframe on this occasion and would appreciate any feedback you are able to provide prior to the audit.

Yours sincerely,

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Environmental Consultant
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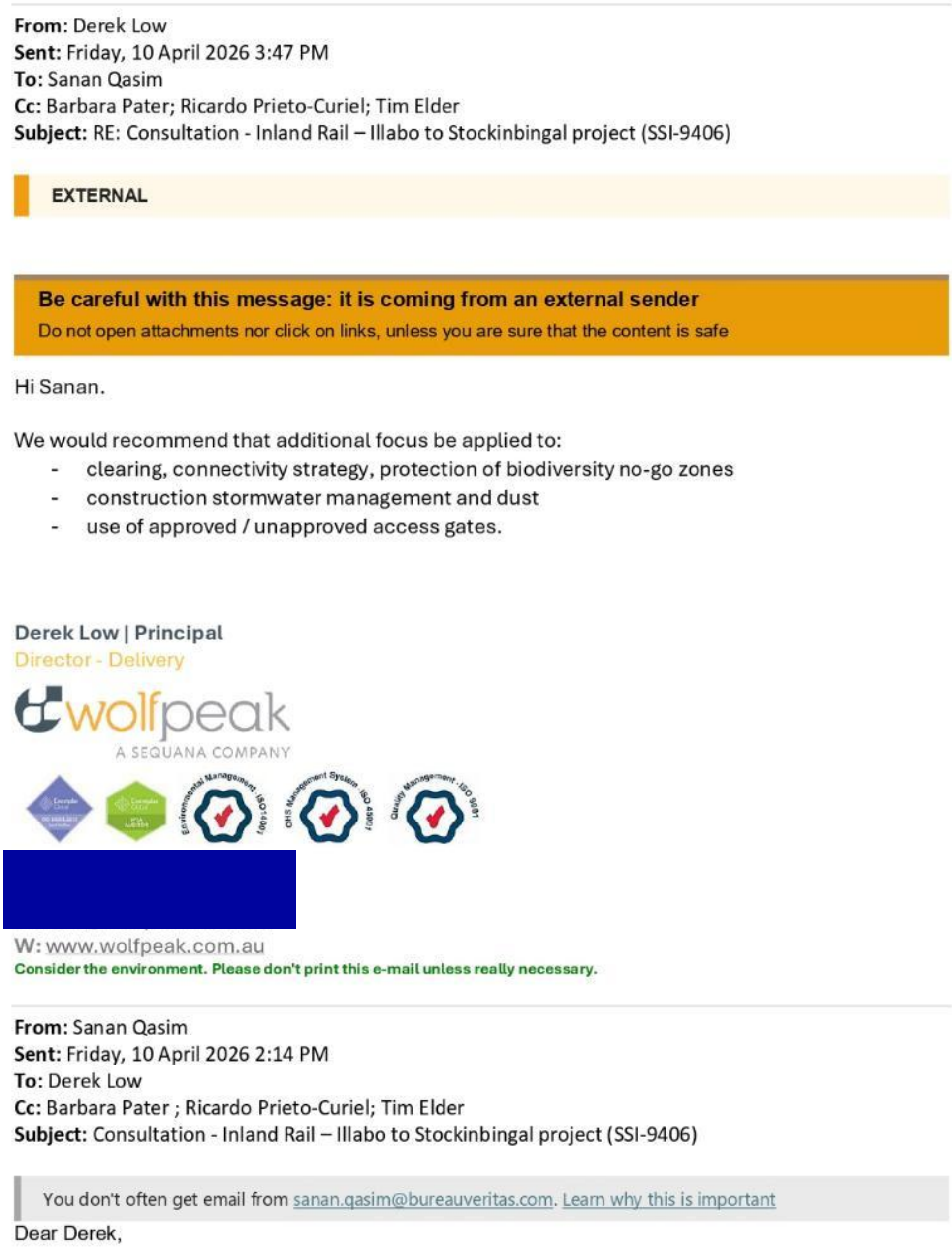
Environmental Representative:



From: Derek Low
Sent: Friday, 10 April 2026 3:47 PM
To: Sanan Qasim
Cc: Barbara Pater; Ricardo Prieto-Curiel; Tim Elder
Subject: RE: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

EXTERNAL

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Hi Sanan.

We would recommend that additional focus be applied to:
- clearing, connectivity strategy, protection of biodiversity no-go zones
- construction stormwater management and dust
- use of approved / unapproved access gates.

Derek Low | Principal
Director - Delivery
wolfpeak
A SEQUANA COMPANY

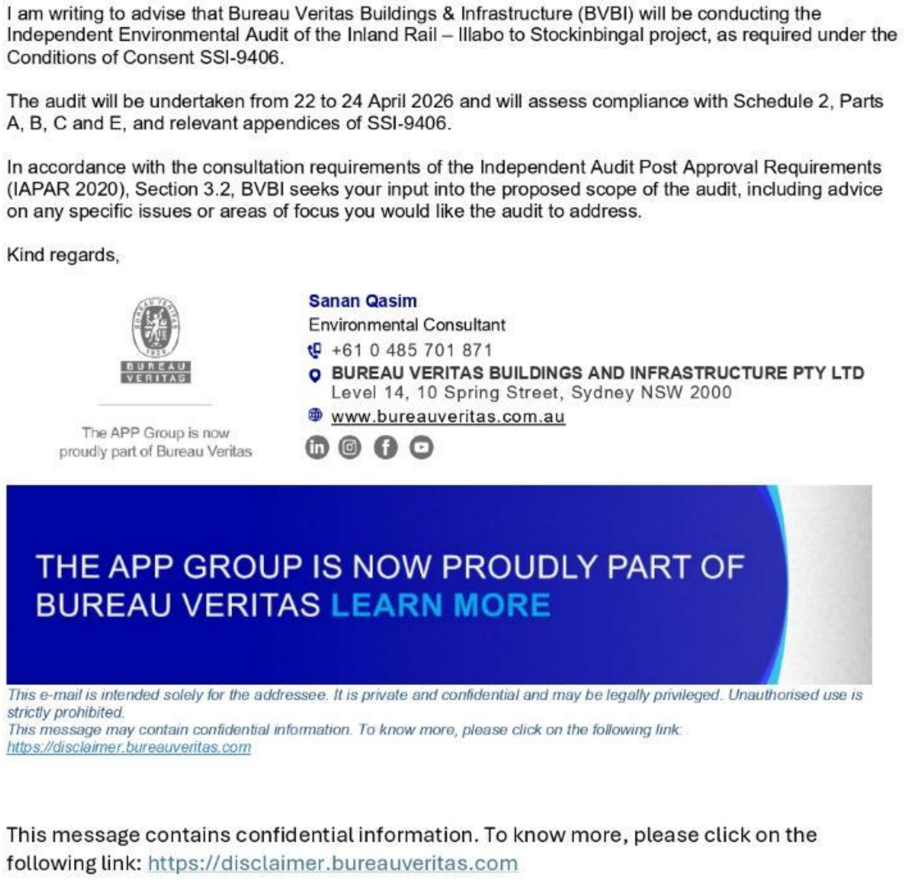
[redacted]

W: www.wolfpeak.com.au
Consider the environment. Please don't print this e-mail unless really necessary.

From: Sanan Qasim
Sent: Friday, 10 April 2026 2:14 PM
To: Derek Low
Cc: Barbara Pater ; Ricardo Prieto-Curiel; Tim Elder
Subject: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

You don't often get email from sanan.qasim@bureauveritas.com. Learn why this is important

Dear Derek,



I am writing to advise that Bureau Veritas Buildings & Infrastructure (BVBI) will be conducting the Independent Environmental Audit of the Inland Rail – Illabo to Stockinbingal project, as required under the Conditions of Consent SSI-9406.

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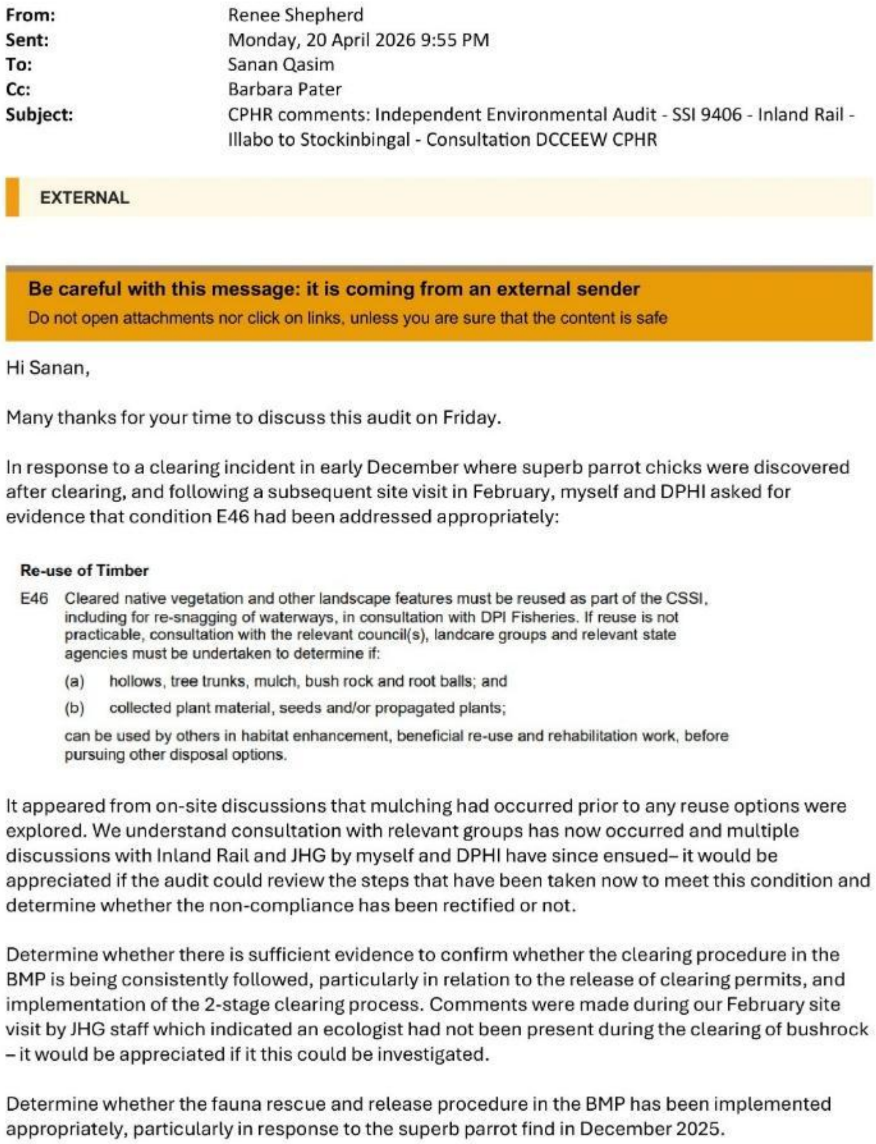
CPHR:



From: Renee Shepherd
Sent: Monday, 20 April 2026 9:55 PM
To: Sanan Qasim
Cc: Barbara Pater
Subject: CPHR comments: Independent Environmental Audit - SSI 9406 - Inland Rail - Illabo to Stockinbingal - Consultation DCCEEW CPHR

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Hi Sanan,

Many thanks for your time to discuss this audit on Friday.

In response to a clearing incident in early December where superb parrot chicks were discovered after clearing, and following a subsequent site visit in February, myself and DPHI asked for evidence that condition E46 had been addressed appropriately:

Re-use of Timber

E46 Cleared native vegetation and other landscape features must be reused as part of the CSSI, including for re-snagging of waterways, in consultation with DPI Fisheries. If reuse is not practicable, consultation with the relevant council(s), landcare groups and relevant state agencies must be undertaken to determine if:

(a) hollows, tree trunks, mulch, bush rock and root balls; and

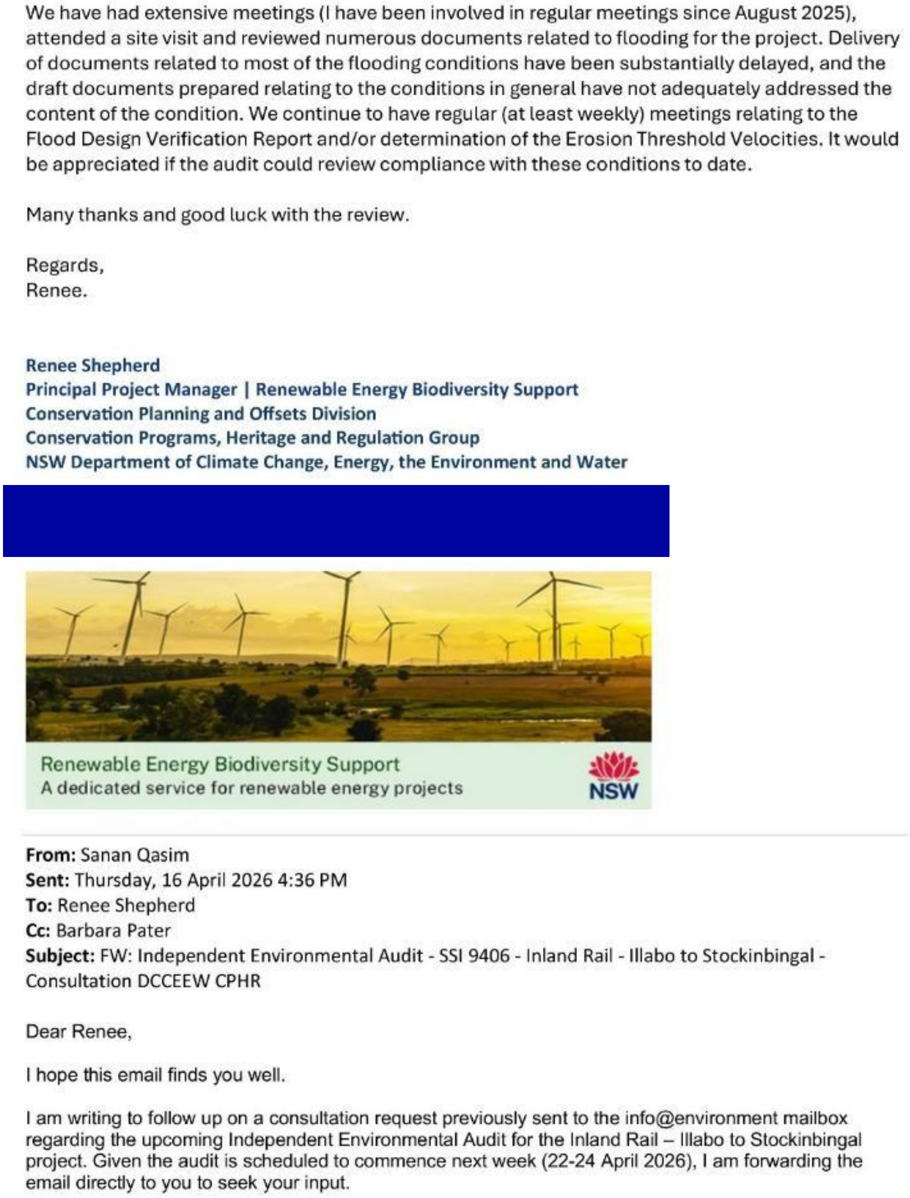
(b) collected plant material, seeds and/or propagated plants;

can be used by others in habitat enhancement, beneficial re-use and rehabilitation work, before pursuing other disposal options.

It appeared from on-site discussions that mulching had occurred prior to any reuse options were explored. We understand consultation with relevant groups has now occurred and multiple discussions with Inland Rail and JHG by myself and DPHI have since ensued– it would be appreciated if the audit could review the steps that have been taken now to meet this condition and determine whether the non-compliance has been rectified or not.

Determine whether there is sufficient evidence to confirm whether the clearing procedure in the BMP is being consistently followed, particularly in relation to the release of clearing permits, and implementation of the 2-stage clearing process. Comments were made during our February site visit by JHG staff which indicated an ecologist had not been present during the clearing of bushrock – it would be appreciated if it this could be investigated.

Determine whether the fauna rescue and release procedure in the BMP has been implemented appropriately, particularly in response to the superb parrot find in December 2025.



We have had extensive meetings (I have been involved in regular meetings since August 2025), attended a site visit and reviewed numerous documents related to flooding for the project. Delivery of documents related to most of the flooding conditions have been substantially delayed, and the draft documents prepared relating to the conditions in general have not adequately addressed the content of the condition. We continue to have regular (at least weekly) meetings relating to the Flood Design Verification Report and/or determination of the Erosion Threshold Velocities. It would be appreciated if the audit could review compliance with these conditions to date.

Many thanks and good luck with the review.

Regards,
Renee.

Renee Shepherd
Principal Project Manager | Renewable Energy Biodiversity Support
Conservation Planning and Offsets Division
Conservation Programs, Heritage and Regulation Group
NSW Department of Climate Change, Energy, the Environment and Water

[redacted]

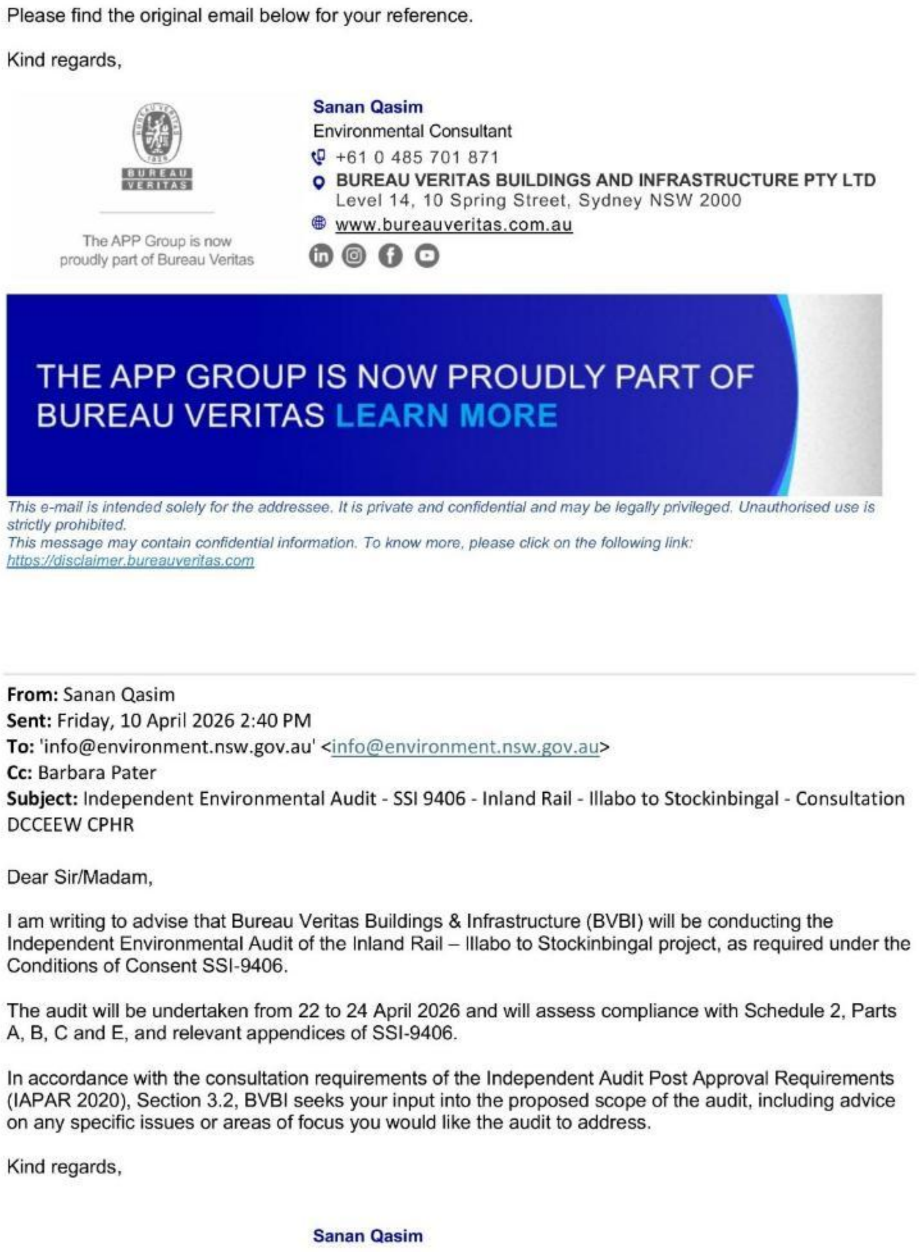
Renewable Energy Biodiversity Support
A dedicated service for renewable energy projects
NSW

From: Sanan Qasim
Sent: Thursday, 16 April 2026 4:36 PM
To: Renee Shepherd
Cc: Barbara Pater
Subject: FW: Independent Environmental Audit - SSI 9406 - Inland Rail - Illabo to Stockinbingal - Consultation DCCEEW CPHR

Dear Renee,

I hope this email finds you well.

I am writing to follow up on a consultation request previously sent to the info@environment mailbox regarding the upcoming Independent Environmental Audit for the Inland Rail – Illabo to Stockinbingal project. Given the audit is scheduled to commence next week (22-24 April 2026), I am forwarding the email directly to you to seek your input.



Please find the original email below for your reference.

Kind regards,

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Environmental Consultant
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www.bureauveritas.com.au

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From: Sanan Qasim
Sent: Friday, 10 April 2026 2:40 PM
To: 'info@environment.nsw.gov.au' <info@environment.nsw.gov.au>
Cc: Barbara Pater
Subject: Independent Environmental Audit - SSI 9406 - Inland Rail - Illabo to Stockinbingal - Consultation DCCEEW CPHR

Dear Sir/Madam,

I am writing to advise that Bureau Veritas Buildings & Infrastructure (BVBI) will be conducting the Independent Environmental Audit of the Inland Rail – Illabo to Stockinbingal project, as required under the Conditions of Consent SSI-9406.

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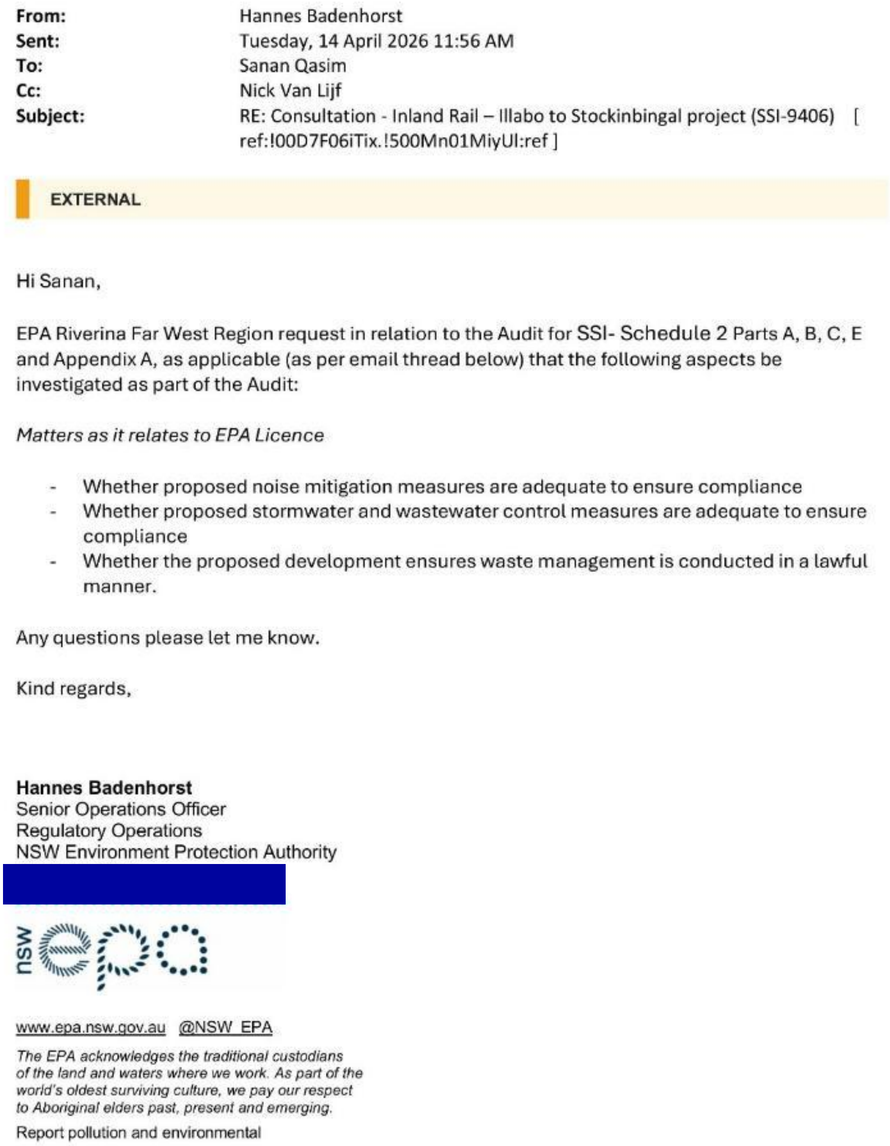
Kind regards,

Sanan Qasim

EPA:



From: Hannes Badenhorst
Sent: Tuesday, 14 April 2026 11:56 AM
To: Sanan Qasim
Cc: Nick Van Lijf
Subject: RE: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406) [ref:!00D7F06iTix.!500Mn01MiyUl:ref]

EXTERNAL

Hi Sanan,

EPA Riverina Far West Region request in relation to the Audit for SSI- Schedule 2 Parts A, B, C, E and Appendix A, as applicable (as per email thread below) that the following aspects be investigated as part of the Audit:

Matters as it relates to EPA Licence

- Whether proposed noise mitigation measures are adequate to ensure compliance
- Whether proposed stormwater and wastewater control measures are adequate to ensure compliance
- Whether the proposed development ensures waste management is conducted in a lawful manner.

Any questions please let me know.

Kind regards,

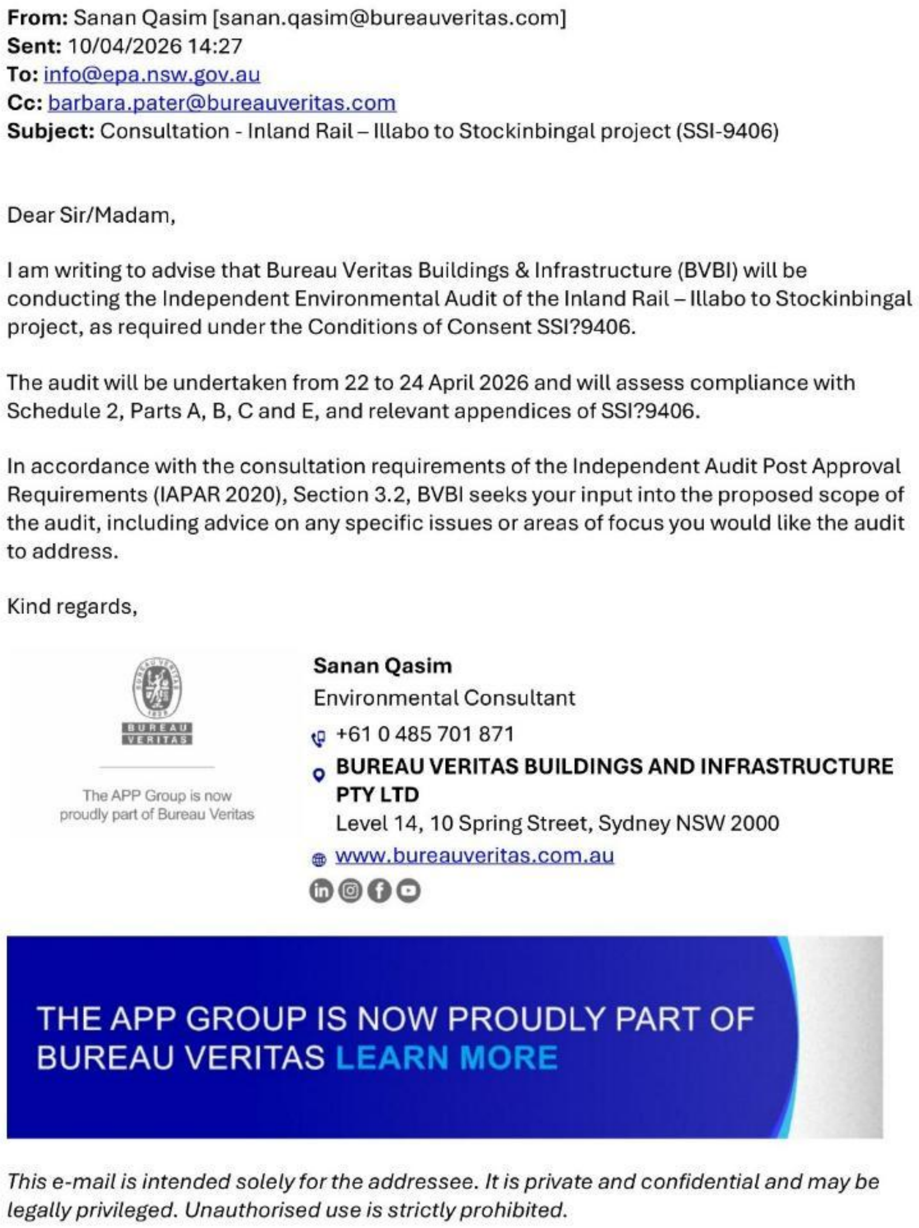
Hannes Badenhorst
Senior Operations Officer
Regulatory Operations
NSW Environment Protection Authority
[redacted]

nsw epa

www.epa.nsw.gov.au @NSW_EPA

The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

Report pollution and environmental



From: Sanan Qasim [sanan.qasim@bureauveritas.com]
Sent: 10/04/2026 14:27
To: info@epa.nsw.gov.au
Cc: barbara.pater@bureauveritas.com
Subject: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

Dear Sir/Madam,

I am writing to advise that Bureau Veritas Buildings & Infrastructure (BVBI) will be conducting the Independent Environmental Audit of the Inland Rail – Illabo to Stockinbingal project, as required under the Conditions of Consent SSI?9406.

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Kind regards,

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Environmental Consultant
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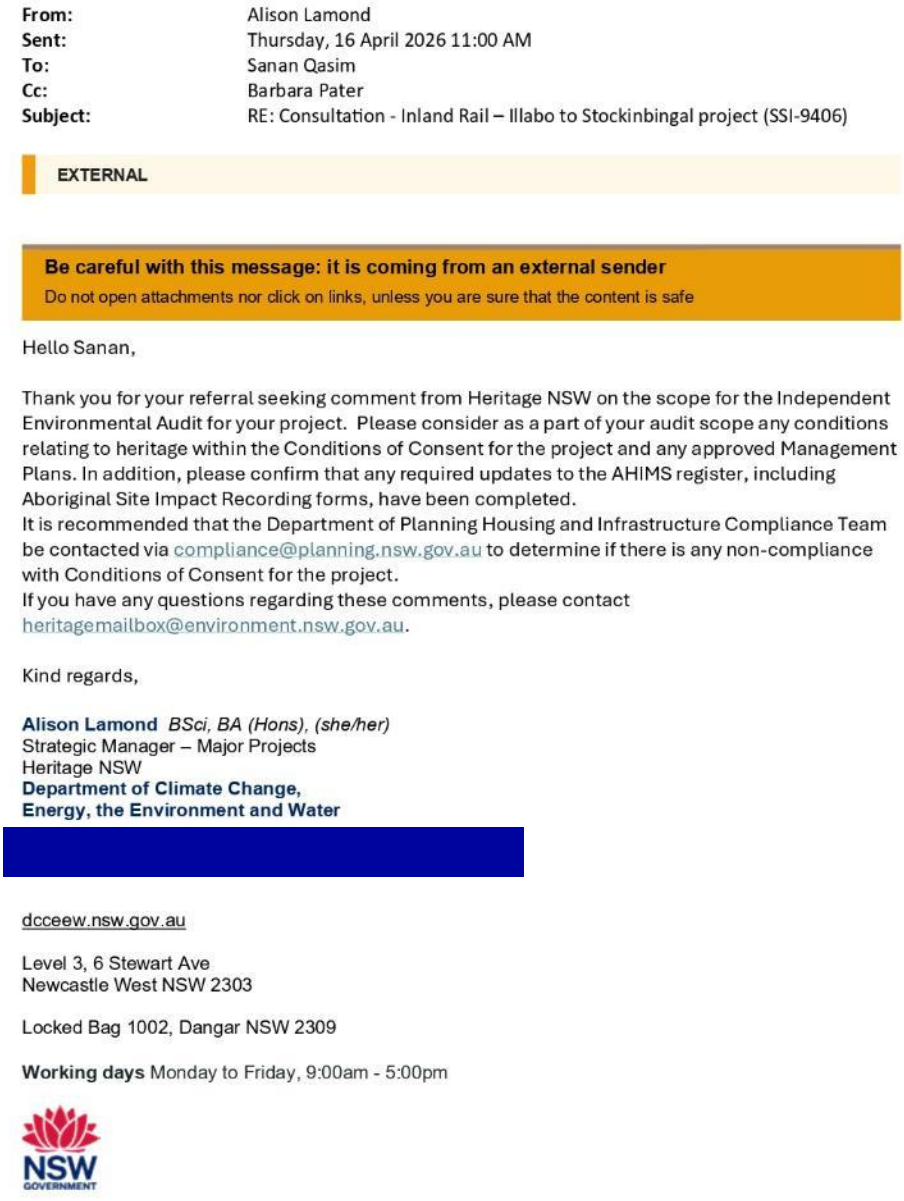
Heritage:



From: Alison Lamond
Sent: Thursday, 16 April 2026 11:00 AM
To: Sanan Qasim
Cc: Barbara Pater
Subject: RE: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

EXTERNAL

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Hello Sanan,

Thank you for your referral seeking comment from Heritage NSW on the scope for the Independent Environmental Audit for your project. Please consider as a part of your audit scope any conditions relating to heritage within the Conditions of Consent for the project and any approved Management Plans. In addition, please confirm that any required updates to the AHIMS register, including Aboriginal Site Impact Recording forms, have been completed.
It is recommended that the Department of Planning Housing and Infrastructure Compliance Team be contacted via compliance@planning.nsw.gov.au to determine if there is any non-compliance with Conditions of Consent for the project.
If you have any questions regarding these comments, please contact heritagemailbox@environment.nsw.gov.au.

Kind regards,

Alison Lamond *BSci, BA (Hons), (she/her)*
Strategic Manager – Major Projects
Heritage NSW
Department of Climate Change,
Energy, the Environment and Water

[redacted]

dcceew.nsw.gov.au

Level 3, 6 Stewart Ave
Newcastle West NSW 2303

Locked Bag 1002, Dangar NSW 2309

Working days Monday to Friday, 9:00am - 5:00pm

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: Sanan Qasim
Sent: Friday, 10 April 2026 2:26 PM
To: OEH HD Heritage Mailbox <HERITAGEMailbox@environment.nsw.gov.au>
Cc: Barbara Pater
Subject: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

Dear Sir/Madam,

I am writing to advise that Bureau Veritas Buildings & Infrastructure (BVBI) will be conducting the Independent Environmental Audit of the Inland Rail – Illabo to Stockinbingal project, as required under the Conditions of Consent SSI-9406.

The audit will be undertaken from 22 to 24 April 2026 and will assess compliance with Schedule 2, Parts A, B, C and E, and relevant appendices of SSI-9406.

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Kind regards,

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Environmental Consultant
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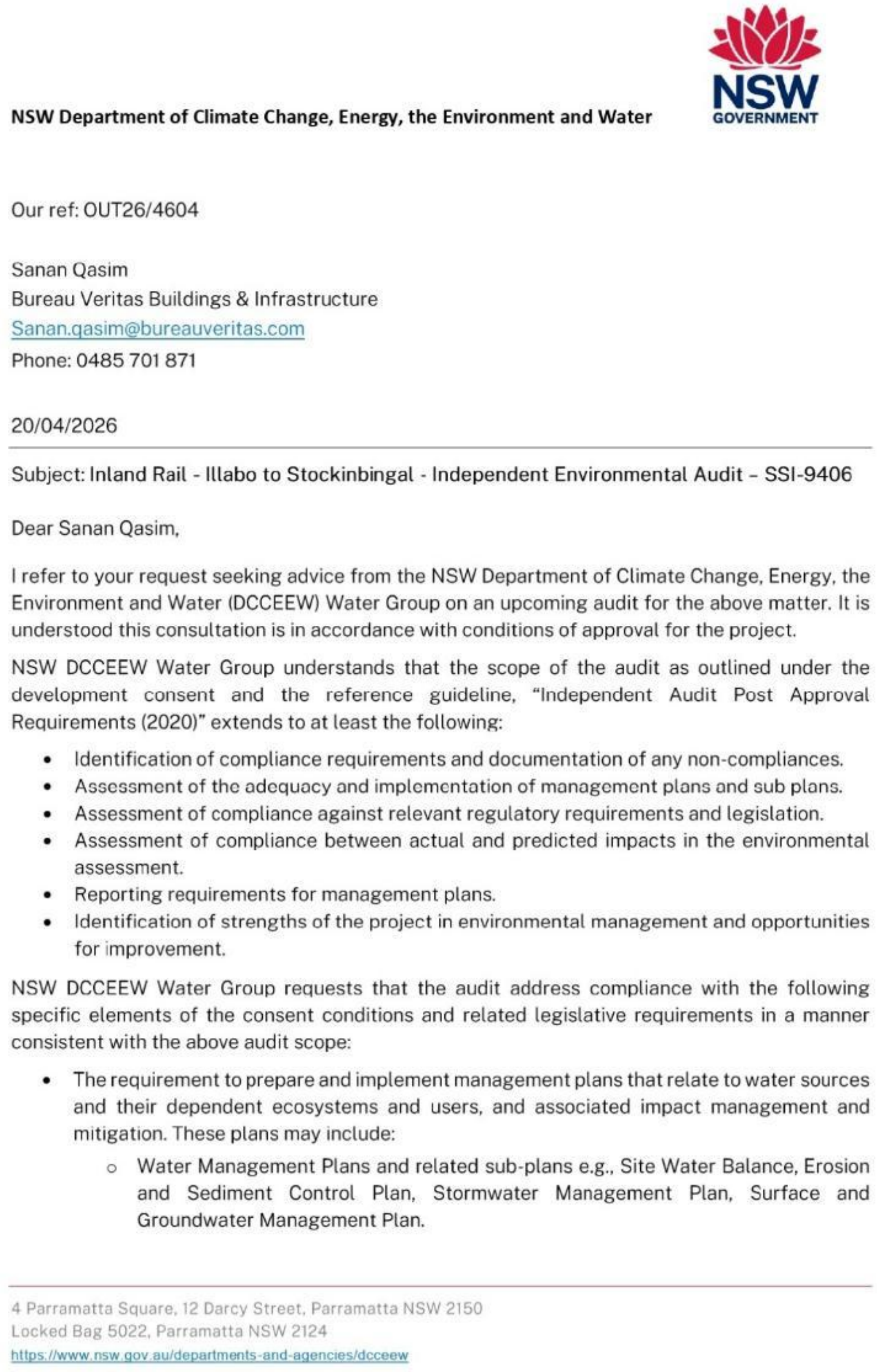
DCCEEW – Water Group:



NSW Department of Climate Change, Energy, the Environment and Water

Our ref: OUT26/4604

Sanan Qasim
Bureau Veritas Buildings & Infrastructure
Sanan.qasim@bureauveritas.com
Phone: 0485 701 871

20/04/2026

Subject: Inland Rail - Illabo to Stockinbingal - Independent Environmental Audit – SSI-9406

Dear Sanan Qasim,

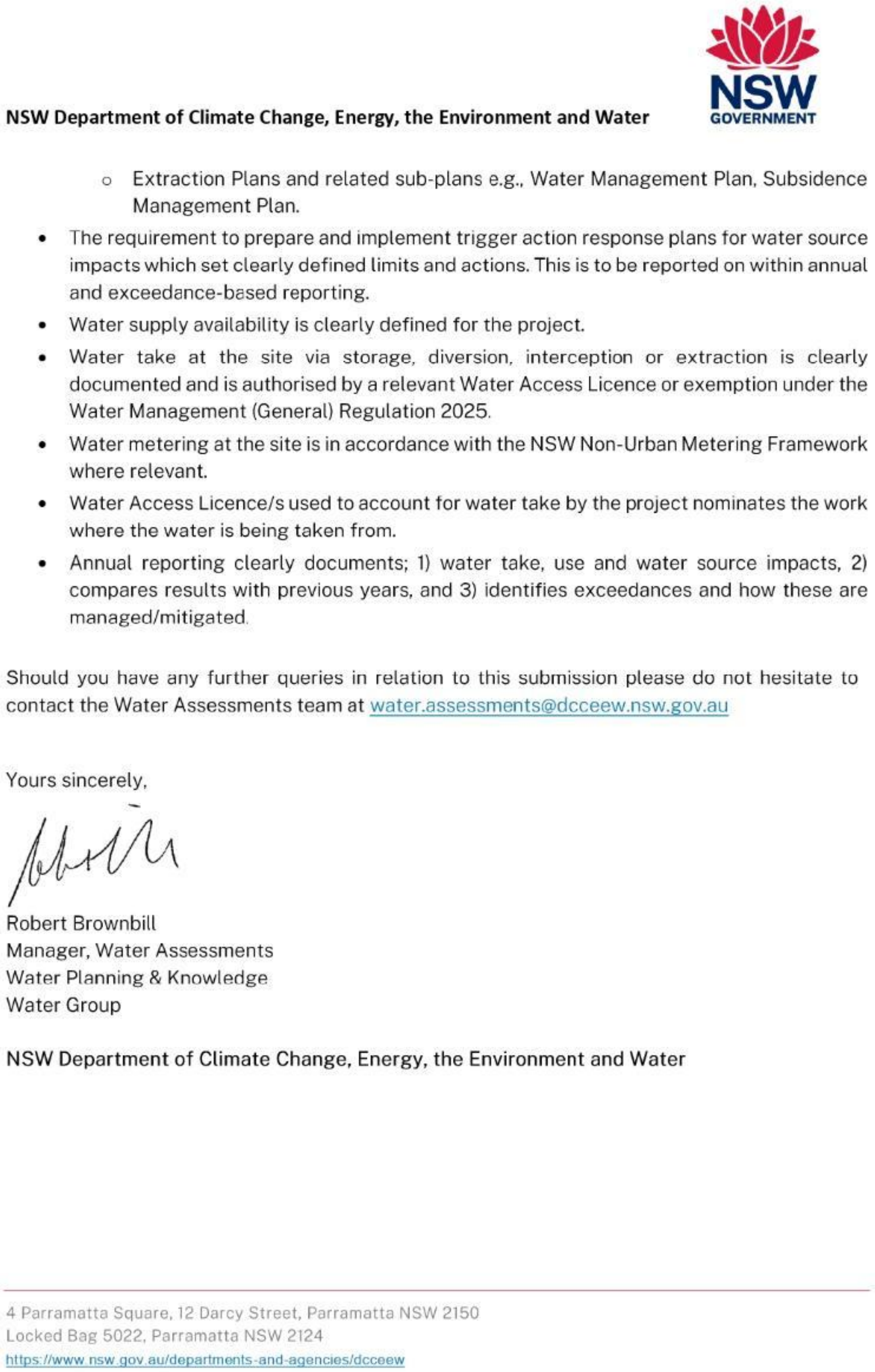
I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
    - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.



NSW Department of Climate Change, Energy, the Environment and Water

    - Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au

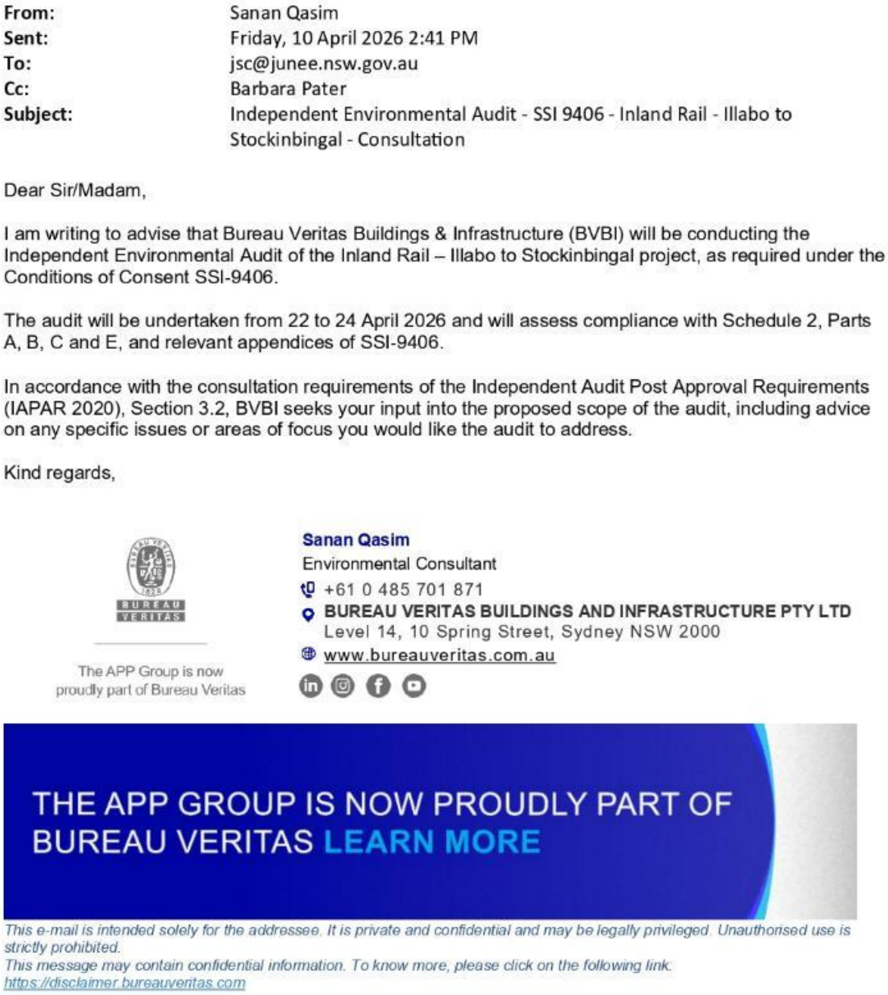
Yours sincerely,

Robert Brownbill
Manager, Water Assessments
Water Planning & Knowledge
Water Group

NSW Department of Climate Change, Energy, the Environment and Water

4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
Locked Bag 5022, Parramatta NSW 2124
https://www.nsw.gov.au/departments-and-agencies/dcceew

Junee Council:



From: Sanan Qasim
Sent: Friday, 10 April 2026 2:41 PM
To: jsc@junee.nsw.gov.au
Cc: Barbara Pater
Subject: Independent Environmental Audit - SSI 9406 - Inland Rail - Illabo to Stockinbingal - Consultation

Dear Sir/Madam,

I am writing to advise that Bureau Veritas Buildings & Infrastructure (BVBI) will be conducting the Independent Environmental Audit of the Inland Rail – Illabo to Stockinbingal project, as required under the Conditions of Consent SSI-9406.

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Kind regards,

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Sanan Qasim
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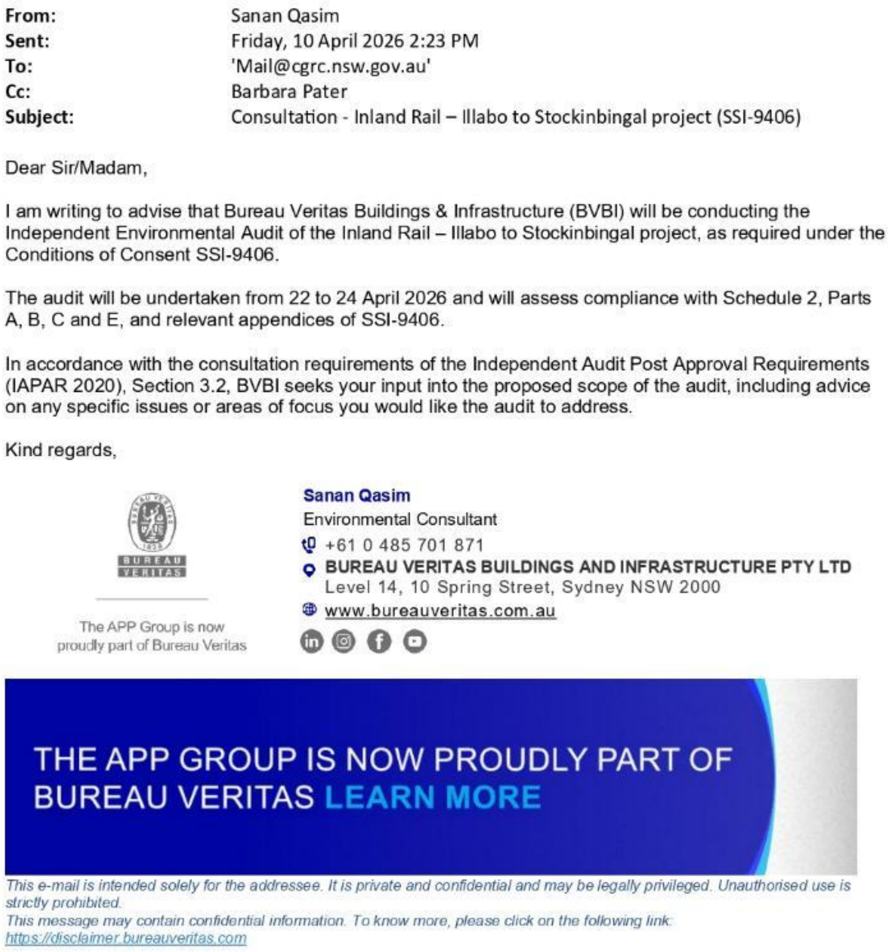
Cootamundra-Gundagai Regional Council:



From: Sanan Qasim
Sent: Friday, 10 April 2026 2:23 PM
To: 'Mail@cgrc.nsw.gov.au'
Cc: Barbara Pater
Subject: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

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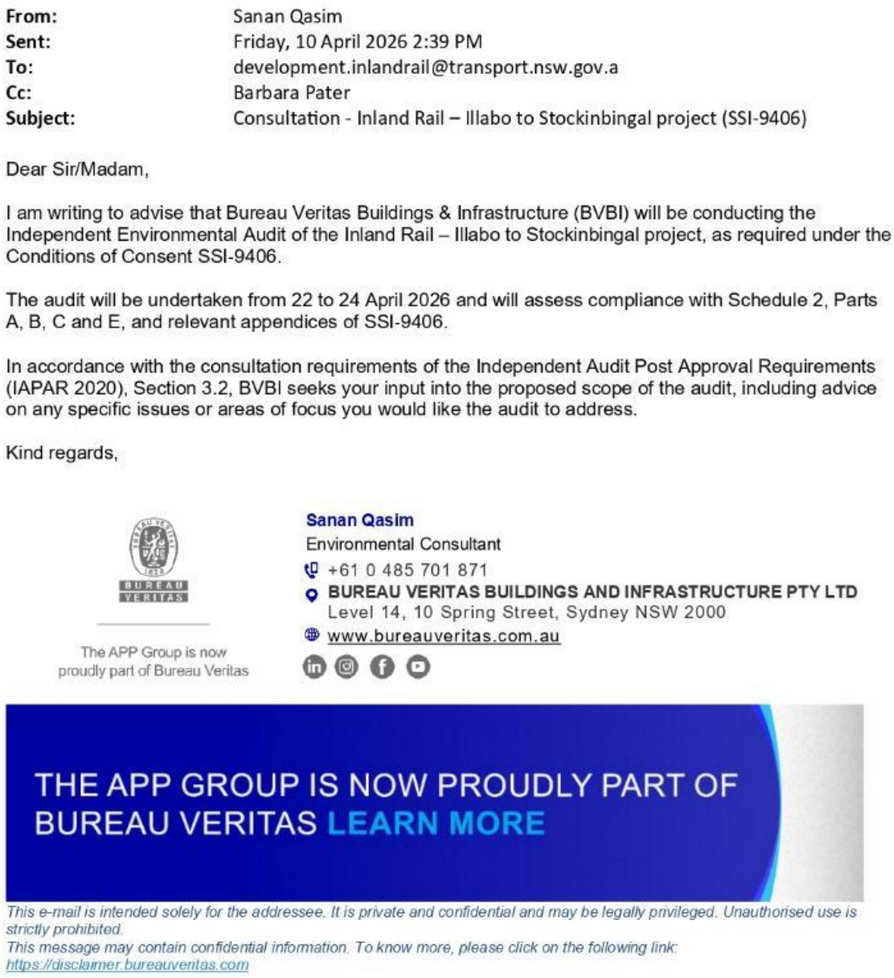
TfNSW:



From: Sanan Qasim
Sent: Friday, 10 April 2026 2:39 PM
To: development.inlandrail@transport.nsw.gov.a
Cc: Barbara Pater
Subject: Consultation - Inland Rail – Illabo to Stockinbingal project (SSI-9406)

Dear Sir/Madam,

I am writing to advise that Bureau Veritas Buildings & Infrastructure (BVBI) will be conducting the Independent Environmental Audit of the Inland Rail – Illabo to Stockinbingal project, as required under the Conditions of Consent SSI-9406.

The audit will be undertaken from 22 to 24 April 2026 and will assess compliance with Schedule 2, Parts A, B, C and E, and relevant appendices of SSI-9406.

In accordance with the consultation requirements of the Independent Audit Post Approval Requirements (IAPAR 2020), Section 3.2, BVBI seeks your input into the proposed scope of the audit, including advice on any specific issues or areas of focus you would like the audit to address.

Kind regards,

The APP Group is now
proudly part of Bureau Veritas

Sanan Qasim
Environmental Consultant
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Appendix G – Audit Photos

Site Inspection Photos

Site Inspection Photos – 23 April 2026

Erosion and sediment controls appeared appropriately implemented with batters covered with geofabric.

Orange flagging installed around creek with habitat trees marked outside the construction area with temporary piped crossing installed for fish passage.

Site Inspection Photos – 23 April 2026

Rocky area at cut 20 is planned to be cleared during blasting process.

Mulch used in some areas for erosion and sediment control.

Site Inspection Photos – 23 April 2026

Exposed areas have been seeded with grass, with growth evident across treated surfaces.

Bund installed along sections of the access driveway as an eros

Site Inspection Photos – 23 April 2026

Existing farm dams along the alignment are being utilised for water storage.

Stockpile and banks stabilised with soil binder.

Site Inspection Photos – 23 April 2026

Moxies operational on site – no dust observed.

Existing farm dams along the alignment are being utilised for water storage.

Site Inspection Photos – 23 April 2026

Earthworks in progress along the alignment – no dust observed.

Concrete pad works in progress with concrete waste bin available.

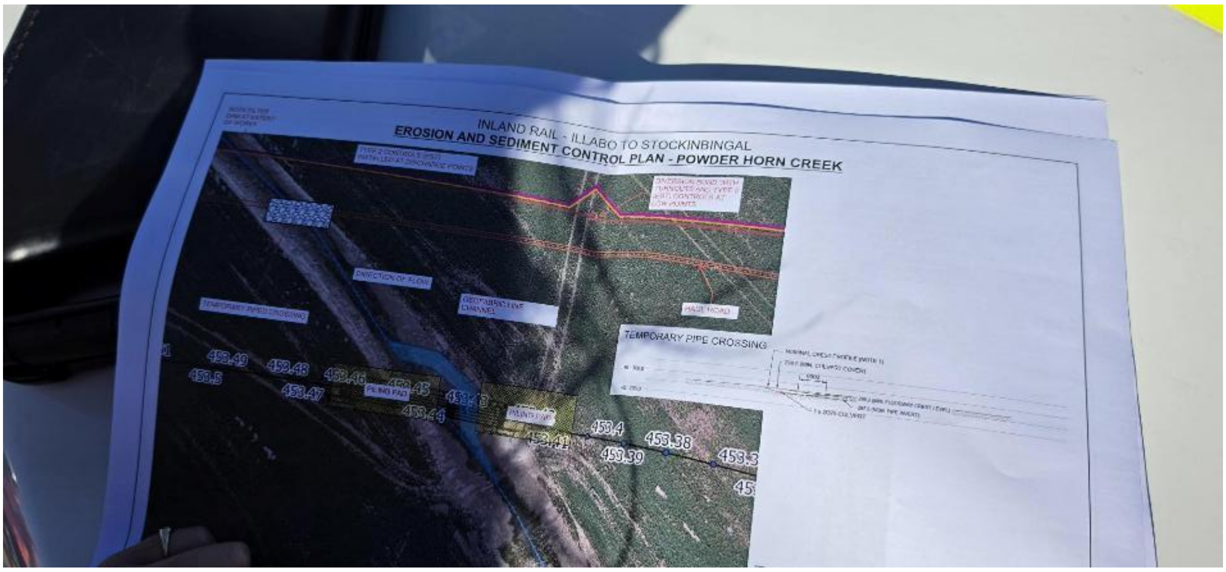
Site Inspection Photos – 23 April 2026

Water cart available on site.

Logs retained on site for future reuse.

Site Inspection Photos – 23 April 2026

Stockpiled material to be crushed and reused for cut and fill works.



Erosion and Sediment Control Plan – Powder Horn Creek.

Site Inspection Photos – 23 April 2026

Temporary piped crossing for fish passage installed at Powder Horn Creek.

Existing ground cover / vegetation noted throughout the creek with exposed areas stabilised with polymer binder.

Site Inspection Photos – 23 April 2026

Rock filter dam installed at Powder Horn Creek.

Clean water diversion installed and lined with geofabric at Powder Horn Creek.

Site Inspection Photos – 23 April 2026

Piling Pad installed at Dirnaseer Rd.

Turkey’s nest installed for water storage and reuse.

Site Inspection Photos – 23 April 2026

Mulch bunds installed along the verge of Dirnaseer Rd.

Rumble Grid in place at Gate 7A to control mud tracking.

Site Inspection Photos – 23 April 2026

Sediment fences installed and observed at low points along the alignment.

Water cart actively operating along the access alignment for dust suppression.

Site Inspection Photos – 23 April 2026

Water fill points installed along the alignment, with silt fencing in place as sediment control.

Spill kit available on site.

Site Inspection Photos – 23 April 2026

Concrete washout trays.

Vegetation and timber stockpiles retained on site for reuse.

Site Inspection Photos – 23 April 2026

Polymer available on site for stabilisation and dust suppression.

Vehicle washdown area at Dirnaseer Compound.

Site Inspection Photos – 23 April 2026

Rock checks in place along the swale drain at Dirnaseer Compound.

A bed level crossing installed at Unnamed Creek with batters covered with geofabric.

Site Inspection Photos – 23 April 2026

Excavated sediment trap installed along the alignment.

Mobile crusher in operation processing material for reuse.

Site Inspection Photos – 23 April 2026

Excavated sediment trap along the alignment.

Piling works in progress at Run Boundary Creek.

Site Inspection Photos – 23 April 2026

Green flagging installed for habitat trees at Run Boundary Creek.

Habitat trees marked with blue paint.

Site Inspection Photos – 23 April 2026

Flagging installed for construction and environmental sensitive area at Run Boundary Creek.

Piling works in progress at Run Boundary Creek.

Site Inspection Photos – 23 April 2026

Timber retained to be reused in BSA Site.

Sediment fence installed around stockpile. Stockpile sprayed with polymer for dust suppression.

Site Inspection Photos – 23 April 2026

Timber retained to be reused in BSA Site.

Timber retained to be reused in BSA Site.

Site Inspection Photos – 23 April 2026

OBS-01: A concrete pour was in progress at the time of inspection; however, a spill kit was not initially available at the work area. Immediate corrective action was taken, and a spill kit was relocated nearby. Spill kits should be maintained at each active work area and relocated as activities progress to ensure immediate availability at all times.

Site Inspection Photos – 23 April 2026

OBS-02: Erosion and sediment control measures were implemented at Powder Horn Creek, with exposed areas covered using geofabric. Due to high winds, pins were removed from one section, resulting in temporary exposure of the area; this was immediately rectified. Ongoing inspection and maintenance of erosion and sediment control measures are recommended especially during weather events.

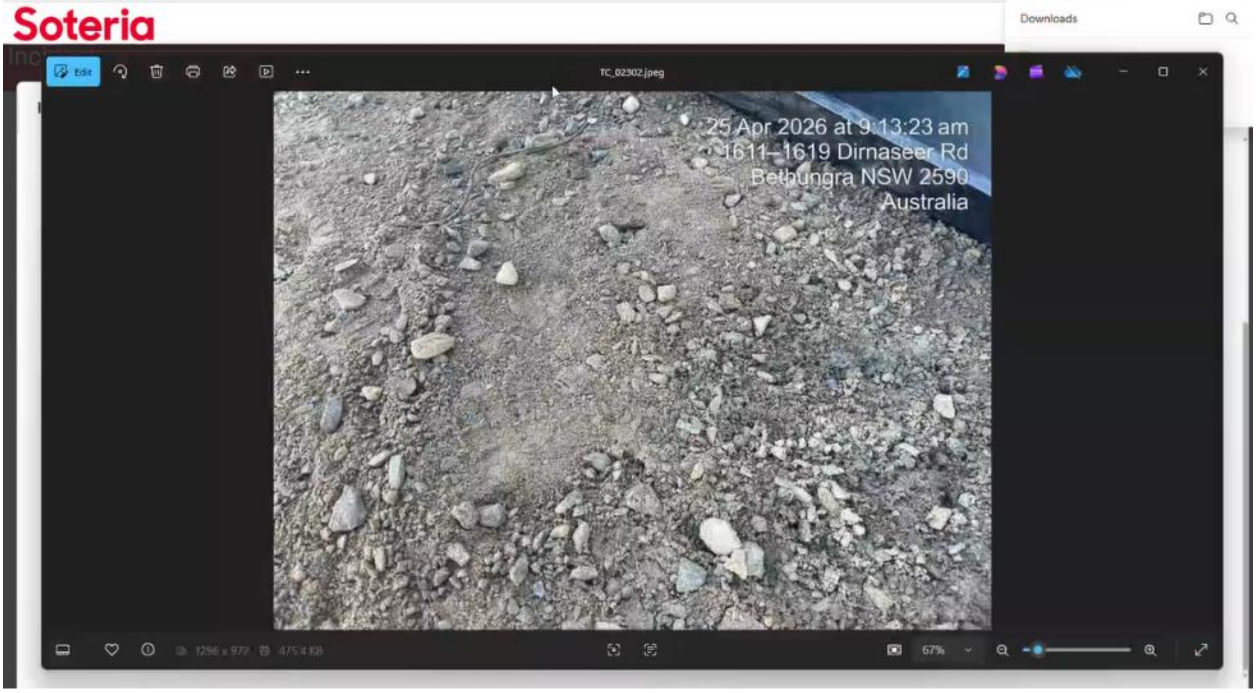
Site Inspection Photos – 23 April 2026

OBS-03: One section of the sediment fence had been removed at the corner of the Gate 7B low sump area. Reinstatement is recommended to ensure adequate controls.

OBS-04: SDS were not available at the chemical storage area in the Dirnaseer Compound. It is recommended that SDS be provided and kept accessible at the storage area.

Site Inspection Photos – 23 April 2026

OBS-05: A spill was identified from a generator located near the washdown area during the inspection. It was recommended that the internal spill incident management process be followed and that the area be cleaned immediately.



OBS-05: Close-out evidence was presented at the closing meeting, confirming that incident INC-0112040 was raised in Soteria on 24 April 2026. Corrective actions included relocating an unused spill tray beneath the generator refuelling nozzle and completing the clean-up of the affected area, with photographic evidence sighted.

Site Inspection Photos – 23 April 2026

OBS-06: The concrete washout area for piling works was located adjacent to the BSA boundary and mulch stockpile. It is recommended that additional controls be implemented when washout areas are situated near sensitive areas to minimise environmental risk.

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