

Final

Googong Township Integrated Water Cycle Project Independent Environmental Audit

Prepared for

Googong Township Pty Ltd

December 2015



Ecology and Heritage Partners Pty Ltd

ACKNOWLEDGEMENTS

The report acknowledges the following people for their participation during the audit including providing the project documentation that was requested and for explaining how these documents are managed and controlled.

- Tino Ferrero – John Holland Pty Ltd
- David Bamforth – John Holland Pty Ltd
- Simba Kippaya – Black Mountain Construction Assurance Pty Ltd
- Lyndall Thornhill – RPS Australia Pty Ltd
- Katherine Hurley – Googong Township Pty Ltd

DOCUMENT CONTROL

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GLOSSARY

Acronym	Description
AHIMS	Aboriginal Heritage Information Management System
BMCA	Black Mountain Construction Assurance Pty Ltd
CAR	Corrective Action Request
CEMP	Construction Environmental Management Plan
EA	Environmental Assessment
GTPL	Googong Township Pty Ltd
JHPL	John Holland Pty Ltd
OoC	Observation of Concern
RPS	RPS Australia Pty Ltd
SWMP	Soil and Water Management Plan
WRP	Water Recycling Plant

SUMMARY

The intention of this audit is to check the compliance by GTPL and construction contractors with the project approval and CEMP and the associated completeness of relevant documents and records. During this audit, it was evident from the responses given that GTPL were effectively complying with the project approvals and the construction contractors namely JHPL were effectively implementing the CEMP for the WRP. However, this audit has uncovered some aspects for which corrective actions will be required by both GTPL and JHPL. This audit also revealed a lack of readily available project documentation that will need to be rectified by JHPL.

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1 INTRODUCTION

In accordance with the administrative conditions listed under the project approval issued on behalf of the NSW Minister for Planning and Infrastructure for Stage 1 of the Googong Township Water Supply Project, a program of independent environmental audits is required to be implemented. The purposes of the audits are to check compliance with requirements of the approval during construction and operations of this project. This audit report contains the findings of an independent environmental audit that was conducted on the project site on the 20 November 2015.

This audit, as with the previous independent environmental audits, was undertaken in a manner consistent with the AS/NZ ISO 19011:2003 – *Guidelines for Quality and/or Environmental Management Systems*, in that:

- a. An audit plan was developed and issued prior to the audit which identified the audit scope, the dates and places where the audit activities were to be conducted, together with the expected time and duration of the audit;
- b. The auditor, prior to the audit, considered information relevant to the audit scope in order to prepare for the audit;
- c. An opening statement was made by the auditor to the audit participants on the day of each audit thereby outlining how the audit would be undertaken;
- d. All persons in attendance during the audit were provided with an opportunity to ask questions during the audit proceedings; and
- e. During the audit, copies of documents were obtained as evidence and to validate particular audit findings.

Since the commencement of construction for Stage 1 of the Googong Township Water Supply Project, there have been five audits conducted as part of the independent environmental audit program. The dates of these previous audits are listed below.

- **4-5 May 2015:** Stage A – Network (east), Stage AB – WRP and Stage B – Network
- **28 October 2014:** Stage A – Network (east) / Stage AB – WRP
- **14 May 2014:** Stage A – Network (west) / Stage A – Network (east)
- **19 November 2013:** Stage A – Network (east)
- **4 June 2013:** Stage A – Network (west)

2 AUDIT OBJECTIVES

Given that this audit is expected to be the last which has applicability to the construction period, it was considered that this audit would have the following three objectives:

1. To examine the currency of the WRP CEMP and supporting plans.
2. To assess the presence and completeness of relevant documents and records including those relating to the following aspects:
 - a. Environmental inspections
 - b. Environmental non-compliance and corrective actions
 - c. Environmental complaints
 - d. Environmental incidents
 - e. Environmental training
 - f. Environmental monitoring and reporting
3. To check the compliance by GTPL of certain conditions listed in the project approval and that are relevant to the present project situation.

3 PREVIOUS AUDIT FINDINGS

According to previous independent environmental audit reports, the arrangement for rectifying any non-compliance identified during an audit relies on GTPL applying the correct procedure to verify the completion of each CAR and OoC and this is managed through the GTPL Compliance Tracking Program. In October 2015 prior to this audit, RPS issued a Compliance Tracking Report for the period January to June 2015 in which the previous audit findings were described together with corresponding follow up actions, including the provision of all necessary documentary evidence to the auditor. As a consequence, this audit finds that there are no unresolved matters from previous independent environmental audit.

4 AUDIT FINDINGS

4.1 Googong Township

In accordance with the project approval for Stage 1 of the Googong Township Water Supply Project, which was issued under Section 75J of the *Environmental Planning and Assessment Act 1979*, there are several administrative conditions, specific environmental conditions, construction conditions and incident reporting conditions that must be met. This audit subsequently checked compliance by GTPL with certain conditions listed in the project approval which are relevant to this current phase of the project, and found that one corrective action is required (Table 1).

Table 1: Required action pertaining to Googong Township project documentation

CAR No.	Details
1	<p>According to administrative condition number A15 which forms part of the project approval issued under Section 75J of the <i>Environmental Planning and Assessment Act 1979</i>, GTPL is required to ensure the following are available for community complaints for the life of the project:</p> <ul style="list-style-type: none"> • A 24-hour telephone number on which complaints about construction at the site may be registered • A postal address to which written complaints may be sent • An email address to which electronic complaints may be transmitted <p>Under this administrative condition, details about the complaints process should be provided on the Googong Township internet site. During the audit, a check of the community focused internet site <http://googong.net/> was undertaken which revealed that on the contacts page <http://googong.net/handy-information/contact-us.php> there existed numerous telephone numbers and email addresses along with a postal address however there was no distinctive or obvious complaints contact for the community. As a consequence, it is not certain if the community knows to whom to send grievances or criticisms about the construction or operations of the project.</p>

4.2 Stage AB – Water Recycling Plant

Section 8.4 of the CEMP for the Stage AB – WRP indicates that independent external audits will occur every six months. As a result of this audit, it was found that one corrective action is required and several observations were made whereby there is a concern about the lack of easily attainable documents and records concerning matters of compliance with the CEMP (Table 2 and 3).

Table 2: Required action pertaining to Stage AB – WRP project documentation.

CAR No.	Details
1	No comprehensive documentary evidence could be provided by JHPL to confirm that mitigation measure SW6 as outlined in the SWMP for Stage AB – WRP is being implemented. It is therefore recommended that JHPL undertake action to review project specific procedures to ensure that erosion and sedimentation controls <u>have been, are being and will be inspected</u> prior to and after each rain period and during periods of prolonged rainfall and that there a process whereby the outcomes of each inspection are being recorded.

Table 3: Concerns regarding Stage AB – WRP project documentation.

OoC No.	Details
1	JHPL was unable to confirm though documentary evidence what dewatering activities, if any, have taken place since May 2015 and this includes what water was tested/treated and when together with the location, date and quantity of water discharged.
2	JHPL was unable to confirm though documentary evidence if it had or would be installing a protective fence around the monitoring bore GGW2.
3	JHPL was unable to confirm though documentary evidence if the acoustic treatments specified in the WRP components of Appendix J of the EA had been or would be installed during construction.
4	JHPL was unable to confirm though documentary evidence if an updated AHIMS search had been undertaken in the last 12 months to ascertain if new Aboriginal objects or sites had been recorded within the vicinity of the project area.
5	JHPL was unable to confirm though documentary evidence if all of the liquid and non-liquid waste removal contractors used during the construction were appropriately licenced which should mean that such waste had been transported to a licenced waste disposal facility.
6	JHPL was unable to confirm though documentary evidence the amounts, dates, times, details and location of disposal of all waste that had been collected for disposal and/or recycling/reuse.
7	JHPL was unable to confirm though documentary evidence what contaminated material resulting from spills (fuels, oils and lubricants) had been transported to a licensed waste disposal facility.
8	JHPL was unable to confirm though documentary evidence who had been involved in the desktop simulated pollution incident that took place in July 2015 and what dates the identified improvements or corrective actions from the simulation were undertaken/implemented.

5 AUDIT CONCLUSIONS

In conclusion, it is obvious from this audit that GTPL is committed to complying with the project approvals and that JHPL is committed to implementing the CEMP. However, this audit finds some improvement could still be made by both GTPL and JHPL to ensure that environmental compliance obligations have been met.

APPENDIX – AUDIT PLAN

This audit, to be conducted by Richard Sharp (the appointed Environmental Representative), will cover the Construction Environmental Management Plans and supporting plans together with all other documents and records including those relating to the following aspects:

- Environmental inspections
- Environmental non-compliance and corrective actions
- Environmental complaints
- Environmental incidents
- Environmental training
- Environmental monitoring and reporting

Friday, 20th November 2015

9:00 am – 11:00 am Stage AB Water Recycling Plant – Administration Office

- Simon Orchard – JHPL
- Simba Kippaya – BMCA
- Lyndall Thornhill – RPS

11:00 am – 1:00 pm Googong Township – Sales Office

- Katherine Hurley – GTPL
- Lyndall Thornhill – RPS