

**INDEPENDENT ENVIRONMENTAL
COMPLIANCE AUDIT
INTERMODAL LOGISTICS CENTRE –
ENFIELD, NSW**



DECEMBER 2016

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EXECUTIVE SUMMARY

An Independent Environmental Audit was conducted of the Enfield Intermodal Logistics Centre (ILC) to assess compliance with approved Environmental Management Plans as well as Compliance Programs required under Planning Conditions of Approval (CoAs). In particular, the audit assessed implementation of Operational Environmental Management Plans (OEMPs) by NSW Ports (Overarching OEMP) as well as OEMP's in place for tenants being Aurizon and Swift Transport.

Systems of management, maintenance and control required by (anchor tenant) Aurizon's OEMP had mostly been established, with a high level of engagement by management, staff and environmental specialists on the day. In general good awareness of Planning Approvals was demonstrated, with these conditions evident in management plans. Operations including locomotive refuelling, container handling and trucking operations appeared well controlled. There were some weaknesses in availability and/or comprehensiveness of records though which should be addressed to ensure future assessment and auditability.

Swift Transport's documentation appeared commensurate with their smaller operation, and the compliance function concerned was very receptive to required obligations. Some issues pertaining to the minor fuel leaks both on the day - and prior according to incident reports – could be an indicator of a systemic problem which might need attention to prevent a significant incident in the future.

This independent audit (again) determined that site management by NSW Ports continued to be of high standard, with systems, processes and maintenance activities, reflective of documented management plans. These included routine landscaping / grounds maintenance generally, as well as specialist maintenance of the Frog Habitat Creation Area. It was observed that native species of shrubs and trees around Mount Enfield had grown since the last audit, as had trees planted around the site generally. Records indicated that roof damage to the Tarpaulin Shed caused by a storm event had been repaired, and rain event scouring had been repaired and improvement was planned anew. From a Planning Approval perspective, the Compliance Tracking Program and related May 2016 Annual Compliance Tracking Report submitted to NSW Planning & Environment indicated no non-compliances.

In summary, no non-compliances were raised as a result of this audit, there being four (4) Improvement Requests. These were predominantly around operational traffic monitoring and movement scheduling implementation requirements, plus demonstrated weaknesses in systems of driver inductions and chemical management by one of the minor tenants.

1.0 AUDIT DETAILS

1.1 Purpose

This independent environmental audit was conducted to confirm environmental compliance with the Department of Planning and Environment (DP&E) Conditions of Approval (CoA) for the Intermodal Logistics Centre (ILC) at Enfield.

CoA 4.1 required Sydney Ports Corporation (now privatised NSW Ports) to develop and implement a Compliance Tracking Program to track and report on compliance with all CoA's. In particular, 4.1 c) requires a program of independent environmental auditing, at least annually unless otherwise directed, with outcomes of compliance tracking to be made available on a public website per 5.4 d).

1.2 Background

Sydney Ports Corporation (SPC) was the original Proponent for the Intermodal Logistics Centre (ILC) at Enfield. In 2013, the New South Wales government privatised related infrastructure, with NSW Ports assuming this responsibility.

Project Approval (the Approval) for the ILC Project was issued by the NSW Minister for Planning on 5 September 2007. Several Modifications to the Approval conditions were made by the Minister between October 2008 and November 2013, the last being Modification 8. The Enfield ILC (project) was intended for the transfer and storage of container freight to and from Port Botany, packing and unpacking of containers within the proposed warehouses and storage of empty containers for later re-use or for return to the Port

The ILC site is located at Strathfield South, approximately 15 km by road from the Sydney CBD and 18 km by rail from Port Botany. The site covers an area of around 60 ha extending approximately from the intersection of the Hume Highway and Roberts Road in the north to the intersection of Punchbowl Road and Cosgrove Road in the south. Operational components included

- Loading and unloading of containers onto trains and trucks;
- Road and rail freight operations;
- Packing and unpacking of containers and short-term storage of cargo in warehouse areas;
- Diesel storage and refuelling;
- Operation and maintenance of the ILC site by NSW Ports, including Heritage values and the Southern Ecological Area.

1.3 Audit Objectives, Criteria & Scope

The audit objective was to assess compliance with:

- Environmental management, including implementation of mitigation measures and controls stated in NSW Ports and tenants Operational Environmental Management Plans (OEMPs);
- Relevant Project Approval conditions and statement of commitments contained in the NSW Planning Approval of 5 September 2007 and subsequent Section 75 Modification Applications 1 to 8, noting that Modification 9 was on hold, and modifications 10 - 13 were being assessed by the Department of Planning

Audit Objectives, Criteria & Scope (continued)

The scope of the audit was limited to implementation of obligations, commitments and environmental practices either at the time of the audit or in the preceding period. Also, asbestos management was not assessed in detail, given the engagement of an independent Site Auditor accredited under the Contaminated Land Management Act to advise and certify remediation and land end-use classification.

1.4 Auditor, Process & Methodology

The on-site audit was conducted by Larry Weiss, of QEM Consulting Pty Ltd on 13th December 2016, comprising a brief site inspection, verification of a sample of Planning Obligations and review of OEMP implementation by NSW Ports and selected tenants. Larry Weiss is an Exemplar Global accredited EMS auditor (Certificate No 12355) and a Member of Engineers Australia (938517). He specialises in a range of audits including certification, surveillance, compliance, voluntary and independent, the latter on behalf of Infrastructure Proponents including Transport for NSW, WestLink M7 and Sydney Water.

The audit assessed a sample of applicable management systems, controls, mitigation measures and compliance verification systems as defined in the OEMP's and related documentation. The audit was undertaken in accordance with ISO 19011:2011 – Guidelines for Auditing Management Systems.

1.5 Auditees and Participation

The following persons were interviewed during the audit:

Name	Organisation	Position
Matthew Fahey	NSW Ports	Site Development Manager
Ian Henderson	NSW Ports	Site Co-ordinator
Trevor Brown	NSW Ports	Environment Manager
Keith Rowe	Aurizon	Acting Area Manager
Mark Harris	Aurizon	Environmental Representative
Heath Anderson	Aurizon	Environmental Co-ordinator
Eshoo Dirou	Aurizon	Road Operations, Leading Hand
Chloe Wakefield	Aurizon	Team Administrator
Geoff DeSantis	Swift	Performance & Compliance Manager

2.0 SUMMARY OF AUDIT FINDINGS

2.1 General

Findings requiring action are summarised below, with NSW Ports' actions in response to these findings to be assessed at the next Independent Environmental Audit. The Audit Checklist / Verification Tables provided in the Appendices provide details of evidence assessed or provided in support of compliance assessment.

The findings are divided into four categories, namely '**Compliant**', '**Non Compliance**', '**Opportunity for Improvement**' or '**Note**'. In this report, "Non-compliance" indicates that the criteria (condition, commitment or Management Plan obligation) have not been consistently and substantially satisfied on the basis of the evidence available. Where an observation made during the audit could lead to an improvement in management processes or potential non-compliance if not attended to in a timely manner, this is classified as an "Opportunity for Improvement" or OFI. A "Note" reflects an observation acknowledged by the Auditor, and in some cases requiring Auditee consideration, if not in the short term but also in the future should the requirement not be triggered as yet. A "Compliant" or C status indicates satisfaction with defined criteria either definitively or predominantly, the latter allowing scope for moment in time lapses which have been or can be rectified in a reasonable timeframe to minimise actual or potential risk.

2.2 Non-Compliance

No actual or potential non-compliances were identified during this audit, concurring with this status recorded in the NSWP Compliance Tracking Program for the last reporting period.

2.3 Opportunities for Improvement

Audit Findings presenting opportunities for improvement are summarised below:

Traffic Monitoring and Auditing

Planning Approval 3.6 requires the implementation of a Traffic and Capacity Monitoring Program (TCMP) to monitor the throughput and traffic generation of the project. Specific requirements were to monitor types of road transport employed, hours of movements, and intended road traffic destinations. Additionally, monitoring was also to include periodic assessment of whether principal routes were utilised and that suburban Greenacre, west of the project, was avoided.

NSW Ports and Tenant TCMP's had addressed CoA 3.6 requirements, but had documented that these would only be implemented within 12 months of commencement of operations or sooner if 50,000 TEU had occurred. Moving forward:

- OFI 1. NSW Ports still needed to implement most components of their TCMP, including traffic counters at specified suburban street locations; plus surveys of trucking types, routes utilised and arrival times.

Traffic Monitoring and Auditing (Aurizon)

Planning Approval 6.3 b) ii) requires movement scheduling where practical, to reduce local road network impacts during sensitive time periods.

Control Measure OT1 of Aurizon OEMP section 5 requires Fleet Allocator scheduling to be utilised in distributing terminal demand evenly to prevent the influx of trucks as far as reasonably practicable during peak periods. However:

- OFI 2. Current Aurizon movement scheduling systems for planning arrival times were somewhat informal, and in all likelihood would not facilitate compliance when throughput increases over time.

Driver education (Swift Transport)

Planning Approval 6.3 b) i) requires a heavy vehicle driver education program to ensure that drivers comply with Planning Approvals, particularly the use of designated vehicle routes.

Whilst inductions were recorded as required by Swift Transport OEMP 2.7 the focus was predominantly Work Health & Safety, and:

- OFI 3. Material used for inductions by Swift Transport did not address community impacts such as noise or truck movements needing to be confined to designated routes. It was noted that Attachment 3 of the Transport Management Plan indicated authorised truck routes and areas where heavy vehicles were not permitted, but this information was not formally communicated to drivers.

Chemical & Spill Management (Swift Transport)

- OFI 4. There is room for improvement in management of chemicals and related fuel spills, this audit noting several minor tenant incidents to date, including 2 new minor leaks on the day. Additionally, it is suggested that 105L drums of oil (as with any other chemicals) should be stored on splash pallets or equivalent.

2.4 Notes

Several Notes recorded in Appendix 2 should be considered by future Auditors and/or Auditees alike.

2.5 Previous audit findings

Actions to previous Audit Findings were verified as being satisfactory progressed and were deemed by the Auditor and Author of this Independent Environment Audit Report to be closed, subject to ongoing implementation in the case of routine operations of the site. Refer to Appendix 1 for further details.

Report Prepared By:



Larry Weiss

Date: December 2016

APPENDIX 1: Previous Audit Findings / Actions

ITEM	REFERENCE	PRIOR AUDIT FINDING	VERIFICATION OF ACTION IMPLEMENTATION	COMPLIANCE STATUS
1.	IEA December 2015	<p><u>Review of Tenant OEMP</u>s</p> <p>NSW Ports OEMP section 3.1 requires NSW Ports to review tenant OEMP to ensure environmental risks are considered and appropriately addressed.</p> <ul style="list-style-type: none"> ➤ Pitkin Transport OEMP very "narrowly" defined weekly and Saturday operating hours and truck movements, indicating operations on Sundays were unlikely. This is in contrast to a near 24/7 operation now in place. 	<p>NSW Ports review of new tenant OEMP's continued, as evidenced further in this report.</p> <p>Pitkin Transport OEMP rev 4 addressed this inconsistency, and subsequent revision rev 5 dated 9/12/2016 reflected change of location.</p>	CLOSED
2.	IEA December 2015	<p><u>Environmental control and monitoring</u></p> <p>Environmental Work Method Statements (EWMSS) were needed to identify controls required for construction activities, as were Site Inspection Checklists to demonstrate that identified controls and mitigation measures were implemented and tenants were to maintain records of their onsite inspections with these to be made available to NSW Ports at any time.</p> <ul style="list-style-type: none"> ➤ Systems did not always ensure that Safe Work Method Statements submitted by construction or work contractors reflected environmental hazards and controls, in the absence of dedicated EWMSS. 	<p>There had been very little "construction" works in the last period, most works being minor and/or maintenance related.</p> <p>A new Environmental Hazards Checklist had been developed by NSW Ports, this furnished to contractors to facilitate the identification of controls in their Work Method Statements prior to submission. Records demonstrated implementation by contractors such as Craven Phillips, Ziggy's Cranes and maintainers such as Dragonfly and Waratah.</p>	CLOSED

ITEM	REFERENCE	PRIOR AUDIT FINDING	VERIFICATION OF ACTION IMPLEMENTATION	COMPLIANCE STATUS
		<ul style="list-style-type: none"> ➤ The process to verify environmental controls and mitigation measures by construction or work contractors should be implemented as defined, or reviewed, as Site Inspections were not always recorded as intended. ➤ The process for periodically verifying that tenant inspection records were being maintained should be enhanced, as records were not always available as required. 	<p>Verification was conducted the same time as formal site inspections conducted by NSW Ports using established forms evidenced in section 1.5 further.</p> <p>Tenant inspection reports were available as NSW Ports records and/or assessed through NSW Ports tenant inspection visits.</p>	<p>CLOSED</p> <p>CLOSED</p>
3.	IEA December 2015	<p><u>Induction material and process</u></p> <p>NSW Ports OEMP section 2.5.2 states that inductions typically include key issues, including nearest sensitive receivers amongst other topics.</p> <ul style="list-style-type: none"> ➤ Induction material used was predominantly safety focused, and additionally did not specifically highlight noise impacts, despite being a key community concern for the operational phase of the infrastructure project/ ➤ The Induction assessment questionnaire used to test comprehension and understanding of important aspects of the site and surrounding community was entirely safety focused, and did not assess any environment/community aspects and impacts, including noise management 	<p>PowerPoint Slide no. 61 et al addressed noise and related community impacts.</p> <p>The Enfield Quiz. (Form) had been updated to reflect pertinent environmental and community questions, including noisy plant and equipment. This assessment process was also implemented by tenants with mixed results described further in this report.</p>	<p>CLOSED</p> <p>CLOSED</p>

APPENDIX 2: Audit Checklist / Findings

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
1.0 NSW PORTS requirements				
1.1 PLANNING APPROVAL OBLIGATIONS (general site management including operations)				
1.	1.2	In the event of an inconsistency between: a) the conditions of this approval and any document listed from condition 1.1a) to 1.1o) inclusive, the conditions of this approval shall prevail to the extent of the inconsistency; and b) any of the documents listed from condition 1.1a) to 1.1o) inclusive, the most recent document shall prevail to the extent of the inconsistency	No inconsistencies noted according to <u>NSWP Compliance Tracking Report #8</u> for the period ending April 2016 and resulting form Auditee response and evidence sampled during <u>this</u> audit.	C
2.	1.3	The Proponent shall comply with any reasonable requirements of the Director-General arising from assessment of reports, plans or correspondence or implementation of any actions or measures contained in these reports, plans or correspondence.	Reportedly requests were mainly of a routine or clarification nature such as that associated with Modification 10.	C
3.	1.6 – 1.10	Warehouse & Distribution limitations, including 6 new warehouses, Dangerous Goods, Warehouse Design. Light Industrial / Commercial Area limitations, including construction 4 precincts and Dangerous Goods. (Text omitted for brevity purposes)	No new warehouses have been developed in the last period.	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
4.	1.11A	Toll Lease Area - , the proponent shall ensure that operations in the former Toll lease area (also known as Area G) are generally consistent with former operations.	NSW Ports had determined that the Swift transport operation were generally consistent	C
5.	2.2	The Proponent shall provide a manual and/or technological solution to control the frequency of articulated and B-double vehicles utilising the Cosgrove Road entrance to the site during morning and afternoon peak periods.	The Cosgrove Road exit was designed to direct traffic northbound away from residential areas. Administrative site rules discouraged use of this entrance / exit. As alluded to in the Item 17 OFI further in this report, no definitive verification was possible or in place at the time of this audit to enable an assessment of a manual or technological solution to control the frequency of articulated and B-double vehicles utilising the Cosgrove Road entrance to the site during morning and afternoon peak periods.	Note
6.	2.3	On-Site Traffic Management and Parking..... parking facilities and loading bays to meet or exceed requirements a) to g)... clear demarcation of all visitor, disabled, ambulance and service vehicle parking areas. (Text omitted for brevity purposes)	On-Site Traffic Management and Parking arrangement observed to be in place. Demarcation of ambulance and service vehicle parking areas was not apparent at all location in use though.	Note
7.	2.6	Parking. The Proponent shall investigate, in consultation with Strathfield Municipal Council, opportunities to install 4-hour parking restrictions along the full length of Wentworth Avenue to discourage the parking of trailers on the approach to the site. Should such measures be found to be feasible and agreed by Council, the Proponent shall arrange to have parking restrictions in place prior to the commencement of operation of the project.	Parking restrictions was still a discussion topic reflected in the RTCG meeting minutes of 22/10/16. On the day of the audit, an email was received from Strathfield Council after reviewing RMS Road Rule 200 indicating that based on this information, current controls on roads around the site were appropriate.	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
8.	2.13	Control of Plant and Equipment Noise Emissions. The Proponent shall minimise noise emissions from plant and equipment operated on the site by installing and maintaining, wherever practicable, efficient silencers, low-noise mufflers (residential standard) and by replacing reversing alarms with alternative silent measures, such as flashing lights (subject to occupational health and safety requirements).	Appeared compliant for all vehicles and tenancies observed, including use of low-noise mufflers. NSW Ports had insisted that the latter were fitted before Swift plant & equipment were allowed on site.	C
9.	2.17	Operational Noise contributions... Table 3 (Text omitted for brevity purposes)	Not required to be enacted as yet.	Future
10.	2.18	Measurement of noise contributions... a) to c) (Text omitted for brevity purposes)	Ditto above	Future
11.	2.19	To avoid any doubt, the Proponent shall ensure that locomotives located on the site associated with operation of the project do not cause an exceedance of the noise limits specified under condition 2.17 of this approval. This shall include where necessary measures to mitigate and manage noise associated with locomotive idling and any shunting operations on the site.	<u>NSWP Compliance Tracking Report #8</u> for the period ending <u>April 2016</u> stated that operations commenced on the ILC site as at <u>May 2016</u> . To date, no complaints have been received regarding noise from locomotives on the ILC site. The (future) noise audits required under the approval will cover operational noise from the IMT site including locomotive noise. Specialist Noise consultants (SLR) Report dated 3 November 2016 had reviewed operational noise impacts associated with the Modification 12 application, deeming consistent impacts to that comprising the original Planning Approval	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
12.	2.43 A Final Site Audit Statement certifying that the contaminated areas have been remediated to a standard consistent with the intended land use is to be submitted to the Director-General prior to operation of the remediated sites.	<p>NSWP Compliance Tracking Report #8 for the period ending April 2016 claimed that SASs had been finalised for Lots 6,8,9,10 and part lot PT22, Lots 7, 18, Part Lot 22 and Part Lot 4, and that these SASs will be submitted to DPE prior to operations occurring within these lots.</p> <p>This audit sighted Ramboll Enviro Site Audit Report dated 6 May 2016 for the Mt Enfield Viewing area, as well as NSW Ports correspondence of 10/6/2016 to DPI submitting SAS's for part lot 22 (internal road network) and public access walkway on Mt Enfield</p>	C
13.	2.46	The Proponent shall ensure that all external lighting installed as part of the project is mounted, screened, and directed in such a manner so as not to create a nuisance to surrounding land uses. The lighting shall be the minimum level of illumination necessary, and be in general accordance with the latest version of AS 4282 – 1997 Control of the Obtrusive Effects of Outdoor Lighting.	<p>NSWP Compliance Tracking Report #8 for the period ending April 2016 stated that NSW Ports will ensure compliance with external lighting conditions during design of (new) warehouse to be constructed.</p>	C
14.	2.47	Prior to the commencement of construction of each warehouse associated with the project (refer to condition 1.6 of this approval), the Proponent shall submit, for the approval of the Director-General, details of the external façade for the warehouse, including demonstration of the façade(s) on an external finishing board. (Further text omitted for brevity purposes)	<p>NSWP Compliance Tracking Report #8 for the period ending April 2016 stated that tenants will be responsible for designing the warehouses in accordance with requirements of this condition in the future.</p>	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
15.	3.3	<p>Within 90 days of the project reaching annual throughput of 50,000 TEU, 150,000 TEU and 250,000 TEU, and within 30 days of commencement of operations in Empty Container Storage Area A, or as may be directed or agreed by the Director-General, and during a period in which the project is operating under normal operating conditions, the Proponent shall undertake a program to confirm the noise emission performance of the project.</p>	<p>NSWP Compliance Tracking Report #8 for the period ending <u>April 2016</u> stated that Intermodal Terminal (IMT) operations commenced in May 2016. The IMT operator is monitoring volumes and advising NSW Ports quarterly.</p> <p>This audit sighted report from Aurizon confirming their first container throughput information in October 2016 being 11,808 and estimating that the annual throughput would be slightly below 30,000 TEU i.e. below the first threshold of 50,000 TEU p.a. NSW Ports indicated that subsequent reports would be on a quarterly basis.</p>	C
16.	3.6	<p>The Proponent shall develop and implement a Traffic and Capacity Monitoring Program to monitor the throughput and traffic generation of the project.</p>	<p><u>Compliance Tracking Report #8 period ending April 2016</u> indicated that pits and conduits for CCTV and communications systems were included in the design for future traffic control within the project site and entrance points.</p> <p>A Traffic and Capacity Monitoring Program (TCMP) is addressed in section 11 of the NSW Ports Overarching Operational Traffic Management Plan dated February 2015, detailing the following elements:</p> <ul style="list-style-type: none"> 11.1 Operator throughput 11.2 Classification traffic counts 11.3 Truck route survey** 11.4 Road safety audit <p>**Truck Route Survey forms would be utilised by each tenant for collection of information from drivers about route taken on nearby roads, type of truck and time of arrival. Surveys would be undertaken within 12 months of commencement of operations or upon 50,000 TEU occurring.</p>	C


ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
17.	3.6	<p>Cont'd: Implementation of the Traffic and Capacity Monitoring Program to include, but not necessarily be limited to:</p> <ul style="list-style-type: none"> a) Provisions for monitoring the throughput of the project; b) Provisions for representative monitoring of the traffic generation of the project, with reference to traffic generation as a function of project throughput, type of road transport employed, hours of traffic movements and intended road traffic destinations; c) Provisions for periodic monitoring of traffic movements on the surrounding road network with a particular focus on the residential areas of Greenacre to the west of the project, generally between Roberts Road, Boronia Road and the Hume highway, and principal road transport routes to and from the site. d) A framework for recording and reporting outcomes of the program of the system for considering data generated through the program 	<p>Given site occupation by key tenant Aurizon in May 2016, implementation of the TCMP had only recently commenced, with further implementation planned around increasing volumes. Specifics on CoA 3.8 requirements a) - d) were:</p> <ul style="list-style-type: none"> a) Aurizon had commenced reporting (as indicated earlier), the audit noting this was only TEU focussed b) Implementation of the TCMP-specified Truck Route Survey form had not commenced as yet, given that triggers for commencement were documented by NSW Ports as future volume and timing based. Neither were specified traffic counters routinely used as yet for 3 street locations specified in TCMP 11.2 c) As above. It was noted however that the proposed Truck Route Survey form above was entirely reliant on driver honesty, not being an independent monitoring mechanism per se. This possible limitation should be considered on the basis of risk and/or reliance on lagging indicators such as complaints to determine the effectiveness of this verification process. d) The TCMP indicated that results from the outcomes of surveys and audits of section 11 would be reviewed by the RTCC. 	<p>Note</p> <p>OFl</p> <p>Note</p> <p>Note</p>

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
18.	4.1	<p>The Proponent shall develop and implement a Compliance Tracking Program to track compliance with the requirements of this approval. The Program shall include, but not necessarily limited to:</p> <ul style="list-style-type: none"> a) provisions for periodic review of the compliance status of the project approvals; b) provisions for periodic reporting of compliance status to the Director-General; c) a program for independent environmental auditing at least annually...and d) mechanisms for rectifying any non-compliance identified during environmental auditing or review of compliance”. 	<p>A Compliance Tracking Register (Spreadsheet) continued to be used to routinely track compliance with Conditions of Approvals and Statement of Commitments. Similar tracking tables had been implemented by Aurizon.</p> <p>It was noted that some “compliant” statements only referenced documented plans ensuring this status, but not objective evidence or due diligence records</p> <p>NSWP Compliance Tracking Report #8 for the period ending May 2016 was available.</p> <p><u>This audit has been undertaken as required by CoA 4.1 c)</u></p>	<p>C</p> <p>Note</p>
19.	5.4	<p>The Proponent shall establish and maintain a new website, or dedicated pages within its existing website for the provision of electronic information associated with the project.</p> <p>The Proponent shall publish and maintain up-to-date information on this website or dedicated pages including, but not necessarily limited to copies of documents referred to under condition 1.1 of this approval, copies of strategy, plan, program and audit required under this approval; and outcomes of compliance tracking in accordance with condition 4.1 of this approval.</p>	<p>A dedicated page for the provision of electronic information & documents required by this condition for the ILC at Enfield project continued to be provided at: http://www.nswportsbotany.com.au/projects-and-planning/ilc-at-enfield/</p> <p>It was noted that 2 other webpages were available, and the above was not very accessible from a public perspective, with some intuition and many clicks were required to get to the above information.</p>	<p>C</p> <p>Note</p>

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
20.	6.1	Prior to the commencement of operations the Proponent shall nominate a suitably qualified and experienced Environmental Representative(s) for DG approval.	NSW Planning & Environment approval of 5/05/2016 was on file pertaining to Mark Harris being the nominated Aurizon ER.	C
21.	6.2	The Proponent shall prepare and submit for the approval of the Director-General a Construction Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed.	This condition is still open, given potential new works such as the railway siding extension. No major works in the last period justified the use of a CEMP, with task-based risk assessments and site inductions sufficing.	C
22.	6.4	Prior to commencement of operations, the Proponent shall prepare and submit for the approval of the Director-General an Operation Environmental Management Plan (OEMP) to detail an environmental management framework, practices and procedures to be followed during the operation of the project	NSW Ports OEMP v4 dated 30/08/2016 was available on the website. Tenant OEMP's are addressed later in this report.	C
1.2 ENVIRONMENTAL MANAGEMENT (Planning & Risk)				
23.	3.1 Appendix F	Environmental Risk Assessment Are Environmental Aspects & Impacts identified in Appendix F still appropriate to current works and operations?	Appendix F Environmental Aspects & Impacts continued to be reflective of operational aspects and actual or potential environment / community impacts.	C
24.	OEMP 2.2 OEMP 2.5.2	Tenant Management Evidence of tenants OEMP consistency review? Consistency of Induction material?	Tenant OEMP's continued to be reviewed by NSW Ports, and in addition to those of Pitkin and ACFS previously, new tenant OEMP's assessed further in this report were deemed by NSW Ports to be consistent with their Overarching OEMP. Audit Findings pertaining to Induction Material content for communicating site and pertinent Planning Approval requirements to truck drivers could imply that this material should also be subject to consistency reviews.	C Note

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
25.	OEMP 2.7	Incident Management. Are operation incidents formally recorded?	Use of the Incident Register continued, reflecting 7 recorded since 2014, with 3 raised in 2016, all of the latter occurring from tenant operations. All incidents were classified as Minor in nature.	C
26.	OEMP 2.5.2	Non-conformance, Corrective & Preventive action Is a Non-conformance Register used to formally record and managing non-conformances and corrective / preventive actions	A Hazard Action Register was being used to track actions required as a result of inspections and audits of tenants. Correspondence was maintained of initiation and follow-up on actions.	C
27.	CoA 7.1	As applicable, are incidents reported to Stakeholders including, EPA, Planning and Council?	Not required, all being minor in nature.	C
1.3 ENVIRONMENTAL MANAGEMENT (Support & Administration)				
28.	OEMP 2.5.3	Training, Awareness & Competence Are personnel undertaking maintenance activities within the defined Green and Golden Bell Frog Habitat Creation Area appropriately trained by NSW Ports Consulting Herpetologist?	Dr White (Biosphere Environmental Consultants) training continued, with a Frog Awareness & Handling training seminar held 22/12/2015. Attendance registers reflected 14 Dragonfly maintenance personnel as well as 2x NSW Ports functions. Dragonfly personnel repairing a footbridge in the From Protection Area on the day of the audit were verified as being inducted on 24/2/14.	C
29.	OEMP 2.8	Information and Consultation Are the following quarterly meetings being held: <ul style="list-style-type: none"> ➤ Road Transport Coordination Group ➤ Enfield ILC Community Liaison Committee 	The NSW website demonstrated regular meetings, 2 by RTCG during 2016 (last one held 22/10/2016) and 4x by the Enfield ILC Community Liaison Committee (last one held on 5/12/2016)	C
30.	OEMP 2.4	Are enquiries, issues and complaints recorded in the Complaints Register for works and operations?	Use of the Environmental Complaint Register continued, reflecting investigation and response to 3 noise related complaints in the last period dated 16/5, 22/6 and 4/10/2016.	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
1.4 ENVIRONMENTAL MANAGEMENT (Operations)				
31.	OEMP 3.3	<p>Are controls and mitigation measures and activities taking place for the operation, maintenance and management of the site management in accordance with Section 3.3 <u>Control Measure</u> requirements including:</p> <ul style="list-style-type: none"> ➤ Traffic & Management, Table 4 ➤ Noise, Table 5 ➤ Air Quality, Table 6 ➤ Stormwater, Table 7 	<p>In general, the site as a whole, including areas managed by NSW Ports presented well with minimal evidence of weeds and recent slashing having taken place. Control measures observed to be in accordance with those specified in section 3.3 included:</p> <ul style="list-style-type: none"> • Marked roadways, signage and unobstructed traffic flow • Use of non-tonal reversing alarms • Covered minor stockpile in Swift area. General Inspection Reports sighted below also reflected use of Waratah's Street sweeper when requested. • Pesticide / herbicide warning signs were used in the Frog Habitat Creation Area. Also, the 3 large stormwater detention basins were relatively empty and schematics were available for the scour protection channel outside the Swift yard, this requiring rehabilitation. 	C
32.		<p>Implementation of the Landscape and Ecological Area Management Plan for the ILC including:</p> <ul style="list-style-type: none"> ➤ Frog protection ➤ Landscaping ➤ Weed management 	<p>Maintenance continued by a specialist service providers, Dragonfly and Waratah Environment Services of the Frog Area and general site landscaping respectively, these records stored in the maintenance database MEX.</p>	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
33.		Continued: Site operation, maintenance and management	<p>Revegetation of Mount Enfield had progressed since the last audit e.g. the photo below shows the area alongside the public pathway to the lookout.</p>  <p>Service Reports from Waratah indicated removal of identified Castor Oil Plant (weed) in May 2016.</p>	C
1.5 ENVIRONMENTAL MANAGEMENT (Monitoring & Improvement)				
34.	OEMP 3.3	<p>Site Environmental Monitoring & Inspections (operations) Does implementation of a maintenance and inspection process indicate routine and scheduled monitoring as required by the OEMP and related Plans.</p>	<p>MEX prompted inspections continued, using the following forms which prompts the checking of controls and areas:</p> <ul style="list-style-type: none"> • General Inspection Report • Landscape Inspection Report (also used after significant rain event) • Building Inspection Report (Tarpaulin Shed) <p>These records included the use of photographs to demonstrate compliance and/or areas requiring attention e.g. repair needed to water pipe in Frog Conservation Area (this triggering a Work Water in MEX)</p>	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
35.	OEMP (CoA 2.34)	<u>Heritage</u> ➤ Inspect heritage items and maintain as per the monitoring schedule outlined in the Heritage Interpretation Plan and Strategy including the Pillar Water Tank & Tarpaulin Shed	As triggered by MEX, scheduled preventive maintenance inspections were taking place, using Building Inspection Report (Tarpaulin Shed) e.g. 18/10/2016. Records were also on file for identified issues needing to be addressed e.g. January 2016 storm damage to roof.	C
36.	OEMP Table 7	<u>Stormwater and Water Quality</u> ➤ Stormwater basin monitoring for functionality ➤ Maintaining stormwater quality improvement devices e.g. gross pollutant traps	Implemented through General and Landscape Inspection Reports. Records of routine and post significant rain events included sediment basin and drain inspections.	C
37.	OEMP (CoA 6.5)	<u>Noise</u> ➤ Noise monitoring/auditing at designated points in accordance with approvals (refer to Appendix H) ➤ Investigative monitoring of noise in response to specific complaints.	Operational activity has not triggered the need for noise monitoring as yet. There were no systemic noise issues requiring any noise measuring in the preceding period.	C
38.	OEMP (CoA 2.40)	<u>Waste</u> ➤ Waste classification/characterisation testing to meet EPA requirements	Waste had only been general in the preceding period.	C
39.	OEMP 2.5	Are there records of inspections / audits undertaken by the tenants?	Sighted for Pitkin, Swift et al.	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
2.0 TENANT (AURIZON) requirements for Operational Environmental Management				
2.1 PLANNING & RISK MANAGEMENT				
40.	Planning Conditions: CoA 6.4 CoA 6.5(b) CoA 6.5(a)	Are the following documents available to manage risk, as prescribed by Planning Conditions: <ul style="list-style-type: none"> Operational Environmental Management Plan (OEMP) Operational Traffic Management Plan Operational Noise Management Plan 	Final draft dated 4 May 2016 Rev 1, March 2016 Revision 2 dated 2/05/2016	C
41.	OEMP 3.1	Environmental Risk Assessment – are environmental risks plus mitigation measures and controls identified in Annexure 1, known and appropriate to the site activities?	Appeared appropriate, including noise, wash bay / treatment basins etc. These being ranked as Medium risk given engineering controls and design features.	C
42.	OEMP 2.6	<ul style="list-style-type: none"> What is the process, and who is responsible for identifying legal obligations referenced? Can it be demonstrated that these are appropriate to the site, and include consideration of Planning Approvals. 	Environmental personnel (below) assist with determination of legal obligations, with Planning Approvals defined in Management Plans. These and general environmental legislative compliance was assessed during compliance reviews and site audits.	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
2.2 SUPPORT & ADMINISTRATION				
43.	OEMP 2.5	Responsibility for environment - evidence of Environmental Representative and Environmental Advisor involvement with site	Both the Environmental Representative and Environmental Co-ordinator attended <u>this</u> audit. Whilst neither are Sydney-based, the ER is involved in quarterly audits and the Environmental Co-ordinator visits monthly, or as required.	C
44.	OEMP 2.7.1 & 2.7.2	<ul style="list-style-type: none"> Employee Environment Awareness records in LMS? Site Specific induction records maintained, including contractors: 	<p>The "Engage" system is used to record general site awareness training utilising a video and a quiz requiring 100% pass.</p> <p>A site Induction Folder was maintained, reflecting hardcopy records of inductions using FRM-006-PRO-005</p>	C
45.	OEMP 2.8	<p>Awareness, and/or implementation of processes for:</p> <ul style="list-style-type: none"> Environmental incidents 	There had been 5 minor incidents to date, some involving hydrocarbon spills, and all being contained. These were recorded in the corporate Aurizon database, with incident 669408 re Diesel Leak from a Container leaking onto the ballast being subjected to an investigation, the resulting report dated 18/07/16 reflected around 170 L involved, use of remediation agent and a repair to the small crack in the tank.	C
46.	OEMP 2.8	<p>Awareness, and/or implementation of processes for:</p> <ul style="list-style-type: none"> Complaints, including provision of register and review of process within 6 months of operation 	A Community Management System was in use with and Enfield ILC Snapshot Report reflecting no recorded complaints for the <u>terminal</u> from 1 October to 12 December 2016. A smoky train event of 25/11/16 had been investigated, this being ascertained as an <u>off-site</u> occurrence of a Port Botany shuttle, this locomotive then assessed at an off-site workshop.	C
47.	OEMP 2.9	Consultation - implementation of commitments including regular participation in the community forum	Attendance by the Acting Area Manager was noted in the RTCG meeting minutes.	C


ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
2.3 OPERATIONS				
48.	CoA 6.5(a) ONMP: ON 2 ON 5 ON 9	Noise and Vibration - Operational Noise Management Plan (ONMP) compliant with CoA 6.5(a) and implemented? E.g. <ul style="list-style-type: none"> • Locomotive idling • Restrictive rail Infrastructure maintenance hours • Triggers for noise monitoring such as regulatory request and substantial changes to operational intensity 	Generally, current operations appeared to be low impact. Maintenance was stated as being undertaken off-site in dedicated Aurizon workshops, and locomotive idling seemed to be at a minimum Whilst noise monitoring triggers had not been reached (per Planning Approvals) NSW Ports had undertaken Noise Impact Studies as part of modification submissions to NSW Planning.	C
49.	CoA 6.5(b) OTMP: 4.1 OT 14 OT 2 OT15 OT 16	Road Traffic & Transport - CoA 6.5(b) required Operational Traffic Management Plan (OTMP) known and implemented? E.g. <ul style="list-style-type: none"> • Site rules incl. pinning & unpinning areas, after-hours access, speed limits • Scheduling, including peak period avoidance • Traffic and Capacity Monitoring Program incl. items a) to d) • Truck Route Survey implementation 	Site traffic requirements including Site Rules addressing after-hours access, speed limits etc. had been communicated through inductions, An inspection of site during this audit confirmed directional indicators, pinning & unpinning areas, speed limit signs, etc. Translogic software was available to provide movement reports, but this was not proactively used in scheduling, planned arrivals currently recorded in a handwritten notebook. There was no chronological time recorded as evidence of peak period avoidance and this system might not suffice when volumes increase over time. No formal Traffic and Capacity Monitoring Program including assessment of local traffic impacts was implemented as yet, including a Truck Route Survey of drivers as input. (This Finding noted for NSW Ports attention generally)	C OFI Note


ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
50.	OEMP 3.4 AQ 1	Air Quality - implementation of controls including: <ul style="list-style-type: none"> Minimising exhaust emissions from vehicles and equipment Locomotives, vehicles, plant & equipment maintained to a good condition, operated efficiently and shut down when not in use 	Locomotives and vehicles observed on the day, including the brief site inspection did not evidence any visible smoke emissions. Aurizon indicated that locomotives, plant and equipment were maintained through a SAP based maintenance system, as well as been subject to regular on-site safety checks.	C
51.	OEMP 3.5 SW 2 SW 3 SW 5	Water Quality and Stormwater Management - implementation of controls including: <ul style="list-style-type: none"> Wash down and other water treatment Fuel Storage Spill Response Direct Locomotive refuelling 	<ul style="list-style-type: none"> Wash down of containers with taking place in designated areas leading to recycling of water used. Refuelling observed on the day (photo below) was indicated as following procedures** 	C
52.	OEMP 3.6 DG 1 DG 2	Dangerous Goods & Hazardous material control incl. <ul style="list-style-type: none"> HAZMAT equipment and procedures Storage and handling of combustibles 	** It is suggested that an audit be conducted of these operations against documented procedures to confirm compliance, and adequacy of spill mitigation measures including equipment adequacy to manage a large spill. No fuel was being stored on site with Spill Response equipment available at numerous locations on site. Temporary storage of Dangerous Goods was occurring in a very open remote sealed are i.e. Bay 14	Note C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
53.	OEMP 3.8 WM 1 & 2 OEMP 5.1 WM 9	Waste - implementation of controls including: <ul style="list-style-type: none"> Storage and segregation of waste generated on site Minimise waste according to the hierarchy of avoidance, reuse, recycle and disposal Waste disposal / tracking 	Waste generated by site appeared to be minimal, and general at this stage.	C
54.	OEMP 3.10.1	Weed and Pest management - implementation of housekeeping or maintenance regimes.	Site appeared to be well maintained	C
55.	OEMP 2.8.1	Emergency Response and Incident Management – any environmental and pollution incidents recorded, and in turn reported immediately to the NSW Ports’ Site Manager (Enfield ILC)	Minor incidents noted as above, there being no pollution incidents per se. NSW Ports were well informed of these nonetheless.	C
2.4 MONITORING & IMPROVEMENT				
56.	OEMP Annexure 3	Environmental Reporting & Auditing – have regular environmental inspections taken place?	Monthly inspections were being undertaken, and formally recorded e.g. 4/7, 5/8, 5/9, 4/10/2016	C
57.		Has SHEM Event being implemented as yet for site inspection findings?	Findings requiring action are recorded in the “Engage” system.	C
58.		What arrangements are planned for OEMP auditing?	Quarterly audits by the ER were planned, sighting Audit Report #1 dated 2 September 2016	C
59.	OEMP 5.5.1	Has the Compliance Tracking Program being implemented and maintained?	Compliance Tracking spreadsheets dated 10, March 2016 were attached as Annexure 6 to the OEMP referenced above. Other than “compliant” statements, there was not much narrative in the spreadsheet tables to evidence this status.	C Note

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
3.0 TENANT (SWIFT) requirements for Operational Environmental Management				
3.1 PLANNING & RISK MANAGEMENT				
60.	CoA 6.4 CoA 6.5(b) CoA 6.5(a)	Are the following documents available to manage risk, as prescribed by Planning Conditions: <ul style="list-style-type: none"> Operational Environmental Management Plan (OEMP) Operational Traffic Management Plan Operational Noise Management Plan 	Final draft dated 30/8/2016 Transport Management Plan, final version dated 23/9/2016 Included in OEMP	C
61.	OEMP 3.1	Environmental Risk Assessment – are environmental risks plus mitigation measures and controls identified in Appendix B, known and appropriate to the site activities?	Appeared appropriate for the current operation.	C
3.2 SUPPORT & ADMINISTRATION				
62.	OEMP 2.3	Responsibility for environment - can be demonstrated that site management have environmental management skills and/or access to competent environmental specialists (used	Aurizon was currently providing environmental expertise to the Performance & Compliance Manager	C
63.	OEMP 2.7	Site Specific induction records maintained, including contractors:	Inductions were being undertaken and recorded, but the focus was predominantly Work Health & Safety. Material used for inductions did not address community impacts such as noise, or truck movements being confined to designated routes. Whilst Attachment 3 of the Transport Management plan indicated authorised truck routes and areas where heavy vehicles were not permitted, this information was not formally communicated to drivers concerned.	OFI

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
64.	OEMP 2.9 & 2.4	Awareness, and/or implementation of processes for: <ul style="list-style-type: none"> Environmental incidents Complaints, including use of Appendix C register 	A Hazard/Accident register was used to capture incidents with 6 minor incidents to date, some involving a minor paint spill which had been contained. NSW Ports and Aurizon were aware of these. A Complaints Register was available in Attachment C of the OEMP, there being no attributable complaints to date.	C
3.3 OPERATIONS				
65.	CoA 6.5(a) OEMP 3.3.2 & App F	Noise and Vibration - Operational Noise Management Plan (ONMP) appended to OEMP compliant with CoA 6.5(a) and implemented? E.g. <ul style="list-style-type: none"> Environmental Checklist implementation Appendix F Container handling west and north of existing warehouse 	Measures (alongside) were seen to be implemented as appropriate.	C
66.	CoA 6.5(b) OTMP: 3.3.1	Road Traffic & Transport - CoA 6.5(b) required Operational Traffic Management Plan (OTMP) known and implemented?	The audit noted that communication and implementation of required controls in the Transport Management Plan could not be formally verified, other than through Aurizon inspections which were site centric and did not assess driver compliance in the surrounding neighbourhood.	Note
67.	OEMP 3.3.3	Air Quality - implementation of controls including: <ul style="list-style-type: none"> Minimise exhaust emissions from vehicles and equipment All vehicles, plant and equipment maintained in an efficient condition and operated in a proper and efficient manner, being turned off when not in use 	Trucking observed on the day, during brief site inspections did not evidence any visible smoke emissions. Swift indicated that vehicles were maintained off site through a "Tiger Fleet" maintenance system.	C

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
68.	OEMP 3.3.4 App G	Water Quality and Stormwater Management - implementation of controls including: <ul style="list-style-type: none"> • Fuel Storage • Spill Response • Refuelling procedure 	Refuelling Procedure SWI NAT 16 was available. A large diesel tank used to store fuel, was located on an unsealed surface with this and related issues identified by a NSW Ports audit as requiring attention.	Note
69.	Refuelling Cont'd		This audit observed some minor dripping from a broken cam lock on the filter bag on the Fuel Storage spill containment unit, shown below (See Incident Management further) 	Note

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
70.		Cont'd	<p>Several oil drums (albeit in the field warehouse) were not be installed on/pallets:</p> 	OFI
71.		Cont'd	A pool of oil was underneath the container forklift next to Gate E2 was noted during the audit. (refer to Incident Management further)	Note
72.		Cont'd	Spill Response Kits were available as required.	C
73.	OEMP 3.3.10	Dangerous Goods and Hazardous materials - implementation of controls including: <ul style="list-style-type: none"> • Risk assessment and approval for packing, unpacking, repacking or decanting dangerous goods? • Storage and handling compliance? 	Not at this stage.	N/A

ITEM	REFERENCE	VERIFICATION / REQUIREMENT	EVIDENCE OF IMPLEMENTATION	COMPLIANCE STATUS
74.	OEMP 2.9	Emergency Response and Incident Management – any environmental and pollution incidents recorded, in turn reported immediately to the NSW Ports’ Site Manager (Enfield ILC)	<p>Prior minor incidents were noted as above, there being no pollution incidents per se.</p> <p>NSW Ports were well informed of these nonetheless.</p> <p>With respect to the hydrocarbon leaking issues observed during this audit, the 2 new incidents were raised the same day in the Enfield Hazard/Action Register. Swift confirmed in writing later the day that the oil pool would be cleaned up that day, and that the broken Camlock had been notified to Go Blue, the repairers.</p>	C Note
3.4 MONITORING & IMPROVEMENT				
75.	OEMP 2.5 Appendix D	Environmental Reporting & Auditing – have monthly environmental inspections taken place?	Formal monthly environmental inspections were taking place, using a checklist/form, the last conducted 30/11/2016	C
76.		Formal Corrective Action to site inspection / audit findings?	NSW Ports had requested formal action to their Audit conducted October 2016.	C