

Clarence Correctional Centre: Environmental Audit

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1. Audit Outline

1.1 Introduction

GeoLINK was engaged by John Holland Group (JHG) to carry out an Independent Environmental Audit (audit) of the Clarence Correctional Centre (Correctional Centre), located at 313 Avenue Road, Lavadia NSW. Real property description is Lot 26 DP751376 and Lot 1 DP 1190399.

The audit was undertaken pursuant to the Minister's Conditions of Approval (MCoA) (Application No. SSD 8368) to undertake an Independent Environmental Audit at the quarry and landfill operation against inter alia, the project approval conditions issued by Department of Planning and Environment (DPE).

The Clarence Correctional Centre is a staged State Significant Development (SSD) approved by the Minister for Planning for the design, construction, operation and maintenance of a new 1700 bed correctional centre at Grafton comprising the following:

- A maximum security centre of 1300 beds that will include:
 - 1000 beds for male inmates; and
 - 300 beds for female inmates.
- A minimum security centre that will consist of 400 beds for male inmates.

1.2 Clarence Correctional Centre Project

On 14 March 2017 the Minister for Planning granted consent to staged SSD Application (SSD 7413) for a concept proposal for a new Clarence Correctional Centre (Stage 1 consent). The concept approval included approval to undertake Stage 1 works including:

- vegetation clearance and biodiversity management activities;
- bulk excavation and site stabilisation works;
- demolition of the existing house and sheds;
- construction of access roads including fire access roads to the extent required to conduct Stage 1 works;
- construction of auxiliary facilities such as construction compound, construction staff parking facilities and stockpiles sites;
- temporary provision of water, power and communication services within the site to the extent required to conduct Stage 1 works; and
- landscaping.

These works have been completed.

Stage 2 Approval (SSD 8368) was granted on 21 December 2017 and allows for construction and operation of the 1700 bed facility including:

- 64 buildings, including visitor reception, special accommodation units, health facilities, education facilities, workshops, storage areas, staff and visitor facilities;
- a recreational oval within the perimeter of the facility;
- six metre high fence/s and wall/s around the perimeter of each facility;

- 12 metre high light and security camera poles;
- on-site waste water treatment facility and associated irrigation areas;
- temporary on-site concrete production facilities;
- one vehicular entry/ exit point from Avenue Road;
- 850 car parking spaces;
- water, power, waste water and communication utilities within the site;
- 1.5 metre high boundary fence; and
- landscaping.

Stage 2 works are currently underway.

1.3 Audit Type

This audit is an Independent Environmental Audit of the Correctional Centre project conducted by GeoLINK. The audit was limited to the operations being undertaken pursuant to the DPE approval for development of Stage 2 of the Correctional Centre as per approval SSD 8368 (2017) pursuant to the MCoA No. B53 and C5.

1.4 Previous Environmental Audit

There are no previous audits undertaken for this project.

1.5 Reasons for Audit

Pursuant to MCoA Condition C5, Independent Environmental Audit states:

All independent environmental audits of the development must be conducted by a suitably qualified, experienced and independent team of experts and be documented in an audit report which:

- (a) assesses the environmental performance of the development, and its effects on the surrounding environment including the community;*
- (b) assess whether the development is complying with the terms of this consent;*
- (c) reviews the adequacy of any document required under this consent;*
- (d) recommends measures or actions to improve the environmental performance of the development, and improvements to any document required under this consent.*

The audit has been prepared to satisfy this requirement.

1.6 Auditee and Representatives

JHG representatives for the audit were:

Name	Position	Role
Trent Doyle	Environmental Manager	Audit Project Manager
Shaun Collins	Environmental Coordinator	Assisting the Environmental Manager
Tiffany Jones	Community and Stakeholder Manager	Assisting with consultation and engagement matters



1.7 Audit Team

The GeoLINK Audit Team for the 2019 audit comprised of:

Mr Simon Williams Lead Environmental Auditor

Mr Duncan Thomson Environmental Audit Reviewer

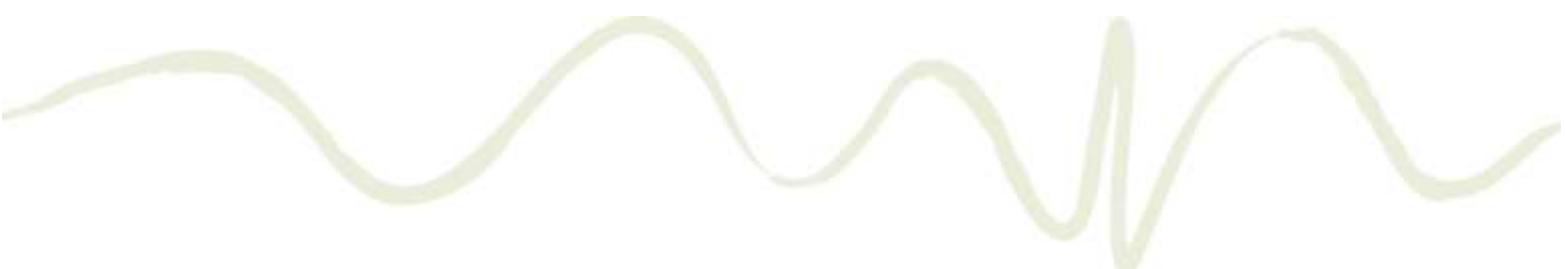
Simon was the Lead Auditor for the project, and coordinated the Environmental Audit, reviewed the available records and documents, attended project meetings and the site visit and reviewed the final audit findings. He was approved by DPE to undertake this audit. DPE approval correspondence is provided in **Appendix D**.

Duncan reviewed the environmental audit, provided advice and ensured quality assurance requirements were satisfied.

The audit team has been selected on their specialist skills in environmental management, environmental compliance, environmental law and auditing.

1.8 Conflict of Interest

This audit is for the Stage 2 (SSD 8368) works of the Correctional Centre as defined by the MCoA. GeoLINK was involved in the vegetation clearing associated with Stage 1 (SSD 7413) which was not part of this audit and at no point did this audit review work undertaken by GeoLINK. Hence there was no conflict of interest.



2. Audit Plan

2.1 Objectives

The primary objective of the audit was to assess compliance of the Correctional Centre with the MCoA issued by the DPE, and other compliance requirements. The secondary objectives of the audit were to:

- Verify legislative and regulatory compliance
- Assess conformance with internal policy and procedures
- Establish the status of current practices
- Identify opportunities for improvement.

The audit focussed on the Stage 2 construction of the Correctional Centre since commencement of the project in January 2018 until the date of the audit on 27 March 2019. The work that has taken place has predominantly been construction of the foundation works, buildings and structures and ancillary developments.

2.2 Confidentiality

As an Environmental Auditing organisation, GeoLINK are given access to documents and information that are considered to be highly confidential. We also work closely with clients that are in direct commercial competition. For these reasons, it is important to our business that we maintain a strict high level of confidentiality for all of our clients.

Whilst our client's information remains confidential, information is made available to the NSW DPE through our work. This information includes this Audit Report, and we accept no responsibility for third-party handling.

The nature of an audit also presents a risk for maintaining confidentiality, as our auditors have client files on their laptops and there is also a potential for client information to be released during conversation. In order to control these risks, all auditors' as employees of GeoLINK are required to complete a Confidentiality Statement as part of their employment contract. Furthermore, all auditors' laptops are password protected and when left unattended are locked.

2.3 Distribution

The audit would be approved and distributed as per below.

Delegated Client Audit Contact	Trent Doyle	John Holland Group
External Audit Approval (DPE)	James Epstein	Compliance, DPE
Internal Audit Distribution	Trent Doyle	John Holland Group

2.4 Audit Scope

The scope of the Independent Environmental Audit was developed with consideration of the nature of the operation, its environmental aspects and potential impacts, the various site activities, and following a review of the project Conditions of Approval.

The scope of the audit included:

- General requirements of the Approval (SSD 8368)
- Environmental Management Plan
- Soil and Water Management Plan (SWMP)
- Noise and Vibration Management Plan
- Air Quality Management Plan
- Flora and Fauna Management Plan (including Vegetation Retention Plan)
- Waste Management Plan
- Concrete Batching Plant Environmental Management Plan
- Site Inspection and general good practice construction environmental management
- Community comments and if any, complaints.

The physical scope of the audit included all works relating to the Correctional Centre project, including:

- Construction areas
- Internal access and surrounding roads
- Sediment basins
- Concrete batch plant.

2.5 Consultation

Contact was made with stakeholders prior to the site inspection to obtain feedback and draw the auditor's attention to any key issues within the agreed scope of the audit. The stakeholders contacted are in the table below:

Agency	Contact	Email/s	Correspondence	Comments from
DPE Compliance	James Epstein	James.Epstein@planning.nsw.gov.au	11/3/2019	James Epstein 12/2/2019
NSW Environmental Protection Authority	Scott Ensbey	Scott.Ensbey@epa.nsw.gov.au	11/3/2019	Scott Ensbey 18/3/2019
Office of Environment and Heritage	-	No involvement	-	-
NSW Office of Water	-	No involvement	-	-



The DPE and Environmental Protection Agency comments can be categorised as follows:

- Environmental Management Plan
- Noise and Vibration Management Plan
- Soil and Water Management Plan.

DPE and EPA requirements have been integrated into the audit report.

2.6 Audit Criteria

The content of the audit is provided by the MCoA Condition B53 and C5 whereby the proponent must undertake an independent audit every year which is documented in an audit report which must:

- Assesses the environmental performance of the development, and its effects on the surrounding environment including the community;
- Assess whether the development is complying with the terms of this consent;
- Reviews the adequacy of any document required under this consent;
- Recommends measures or actions to improve the environmental performance of the development, and improvements to any document required under this consent.

2.7 Audit Approach and Methodology

The DPE has released the Independent Audit: Post Approval Requirements June 2018. The guideline was developed to ensure audits of SSDs are undertaken in a consistent manner and meet minimum quality standards.

The audit approach followed the standardised procedures for environmental management systems auditing established under AS ISO 19011:2014 Guidelines for Auditing Management Systems and the Independent Audit: Post Approval Requirements June 2018. Details of the methodology are provided in **Appendix A**. In summary, the methodology consisted of an initiation stage followed by the pre-audit, audit and post-audit stages as follows:

Initiation Stage

- Organisational review
- Review of available background information
- Review of previous audit findings (if any).

Pre-Audit Stage

- Development of an audit plan
- Development of audit protocol and checklist.

Audit Stage

- Opening meeting
- Review of documentation
- Detailed site inspection
- Interviews with relevant personnel
- Review of audit evidence
- Closing meeting.



Post-Audit Stage

- Review of audit data
- Preparation of audit report.

The checklist provided in **Section 3** documents the specifics of the audit and the responses of the JHG's team in relation to these requirements.

2.8 Interview and Site Inspection

Staff interviews, and document review was undertaken on 27 March 2019 at the offices of JHG in at the Correction Centre site office at Lavadia (via Grafton) with:

- Trent Doyle – Environment Manager
- Shaun Collins – Environmental Coordinator
- Tiffany Jones – Communications and Stakeholder Manager

A site inspection also occurred with Shaun Collins of JHG on 27 March 2019.



3. Audit Findings

The 2019 audit findings and observations are presented and discussed in **Section 3.2**. The 2019 audit findings are provided within the completed audit table, provided in **Appendix B**.

Findings within the table are listed as compliant, non-compliant or not triggered. Notes are included in the following sections. They are described (where applicable) as follows:

- *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 had not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Overall, the level of compliance with good environmental management practices is satisfactory. Management and staff at the project are fully committed to implementing and complying with the project approval requirements. Examples of good environmental management practices observed during the audit included the following practices:

- Recycling of construction packaging materials
- Record keeping
- Genuine intent to manage the site's environmental issues.

3.1 Summary of Environmental Audit Findings

The following issues of non-compliance with the relevant requirements were identified during the 2019 audit. The audit table provides a detailed analysis of the audit and is provided in **Appendix B**.

3.1.1 Non-Compliance 1: Progressive Erosion and Sediment Control Plan

Requirement

Soil and Water Management Plan: SW14

All project personnel shall be made aware of erosion and sediment control devices at induction and the ESCP is to be displayed in prominent location at site sheds.

Findings

The Progressive Erosion and Sediment Control Plan (PESCP) was not available on the notice board and was not included in the induction information.

Discussion

The site has a PESCP which is prepared by JHG environmental staff and checked and certified by the Certified Professional in Erosion and Sediment Control, Soil Conservation Service. This requirement relates to ensuring that all personnel are made aware of the ESCPs on the site and are then able to ensure they note issues and corrections. The PESCP should be shown and discussed at the staff site induction and displayed on the noticeboard to allow staff to review the ongoing revisions.

3.1.2 Non-Compliance 2: Maintenance of Soil and Erosion Controls

Requirement

Soil and Water Management Plan: SW16

Erosion and sediment controls shall be cleaned or replaced prior to accumulated sediments and obstructions reducing their effective operating capacity by 60%. Controls which are damaged or otherwise rendered ineffective shall be immediately replaced.

Findings

Site Inspection.

- Water discharge point at Sediment Pond 3 had been tracked across by vehicles compromising water quality at discharge point. Ensure these areas are flagged off to stop vehicles, and the site repaired.
- Male Max South West corner temporary storage basin to Sediment Basin 5 requires significant repairs and re-design to ensure the damage does not occur again.

Discussion

During the site inspection, a number of erosion and sediment control matters were raised and noted above. The SWMP has been prepared and approved consistent with the MCoA. The project has managed the site's water by using this management plan and implementing the design plans and recommendation as prescribed. It is accepted that the site had had significant rain prior to the site audit, however it is strongly recommended that these erosion and sediment control issues are remediated as soon as possible following these rain events.

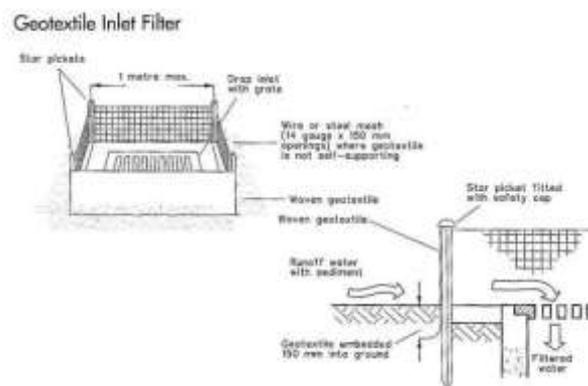
3.1.3 Non-Compliance 3: Stormwater Pits

Requirement

Soil and Water Management Plan: SW19

All stormwater drainage inlets and other discharge points where there is potential for sedimentation to occur as a result of construction activity shall be protected by geofabric and/or sandbags as appropriate.

Section 5.2.5 - Inlet filters will be utilised during the later stages of construction stage where permanent stormwater drainage systems are installed and required to divert of runoff to a sediment basin or trap. Filters may be constructed from sandbags and/or sediment fence (below). The placement of geotextile pit bags underneath pit grates may be used, but must be carefully monitored to avoid blockages resulting in adverse flooding.





Findings

The stormwater pits throughout the site (i.e. Men's Max area) require cleaning out and reinstating. Several pits throughout the site appeared to be damaged from recent rains.

Discussion

The SWMP has been prepared and approved consistent with the MCoA. Management of stormwater pits is outlined in section 5.2.5 Inlet Filters as reproduced above. Ensure all pits are cleaned, erosion and sediment controls reinstated and are functioning to standard pursuant to the requirement in the SWMP.

3.1.4 Non-Compliance 4: Mulch Stockpile

Requirement

Soil and Water Management Plan: SW19

Long-term (greater than 10 days) stockpiles, batters and other erosion sensitive areas shall be adequately stabilised through velocity reduction covering, grassing, vegetation, soil binding, water diversion or other as appropriate.

Findings

Mulch stockpile area bunding has deteriorated and is missing sections.

Discussion

Section 3.6 of the SWMP discusses the methodology for bunding mulch stockpiles. Inter alia, due to the risk of tannin release, it is important to ensure that mulch stockpiles are bunded appropriately, including the use of earth as bunding material. The project should ensure this mulch stockpile area bunding is reinstated as shown on the PESCP.

3.1.5 Non-Compliance 5: Chemical Storage

Requirement

Soil and Water Management Plan: SW41

No refuelling, stockpiling or chemical storage to occur near stormwater drainage points.

Findings

It was noted on the site inspection that some fuel containers were not being stored in bunded containers, including on sediment basin bunds.

Discussion

It is noted that the site has a diverse range of workers undertaking various tasks on-site from production of large pre-cast concrete units, to electrical tradesman with little environmental risks. However, it is important that storage and containment of chemical and fuels is undertaken within the expected industry practices, including containment. For this reason, all chemicals and fuels should be stored within impervious secondary containment facilities.

Ref: Environmental Compliance Report – Liquid Chemical Storage, Handling and Spill Management (DEC 2006).

3.1.6 Non-Compliance 6: Noise Data field Sheets

Requirement

Noise and Vibration Management Plan: 7.4

The following information must be included in noise monitoring reports when applicable:

- *Field calibration results (before and after measurements);*
- *Measurement times and dates;*
- *Qualitative description of the noise environment during measurement;*
- *LA1, LAeq and LA90 levels;*
- *Meteorological conditions during the measurements;*
- *Estimation of recorded noise contribution from other major noise sources.*

The Construction Contractor Project Manager shall establish and maintain a system of records which provides full documentation of all noise monitoring results, complaint handling and responses to non-compliances. The Construction Contractor Project Manager shall establish and maintain procedures for the collection, indexing, filing, storage and maintenance of the records.

Findings

Reports include the required information however on a number of Noise and Vibration Monitoring Summary sheets the L90 was missing.

The meter does not have an external field calibration device, alternatively it has the ability to self-calibrate (RION).

Discussion

Ensure the L90 is recorded on the Noise and Vibration Monitoring Summary sheets.

The RION noise meter has the ability to self-calibrate however the Noise and Vibration Management Plan requires a field calibration, before and after. Calibration is essential to ensuring that the noise records are correct. Advice should be sought on where the self-calibration is acceptable or whether the unit requires a field calibration.

3.1.7 Non-Compliance 7: Mud Tracking

Requirement

Air Quality Management Control Plan: AQ17

Public roads adjacent to site access/egress points shall be inspected daily for soil or mud build-up as a result of construction activities. Surfaces shall be cleaned as appropriate for the road conditions.

Findings

There was a small amount of mud tracking on Avenue Road.

Discussion

The site had experienced rain the night before the inspection and it appeared that this led to the mud tracking along Avenue Road. A rumble grid and wheel wash are installed at the entrance for vehicles leaving the site which was working well. Ensure that a street sweeper is employed when the public roads experience mud tracking.

3.1.8 Non-Compliance 8: Landscaping and Rehabilitation Plan

Requirement

Flora and Fauna Management Plan: 29

The Landscaping and Rehabilitation Plan describes in detail the management strategies regarding rehabilitation on the Project. The Landscape Management Plan will consider a range of constraints and opportunities associated with the Project including collection and propagation of local seed, salvage and reuse of topsoil and woody debris. The Landscape Management Plan will aim to revegetate buffer lands using the same species composition and structure as currently exists on the site and includes a program for monitoring and maintenance of plantings.

Findings

There is no Landscaping and Rehabilitation Plan.

Discussion

The Flora and Fauna Management Plan should be amended to remove reference to the Landscaping and Rehabilitation Plan. A reference to the Landscape Plan could be included.

3.1.9 Non-Compliance 9: Waste Management

Requirement

Resource Use and Waste Management Plan: W17

Wastes shall be generally monitored on a daily basis to ensure that any materials which may cause land and/or water contamination or create odour problems are removed from the site in an appropriate manner.

Findings

It was evident during the site inspection that some waste was not being placed in waste bins, including waste polystyrene being located around the perimeter of the site.

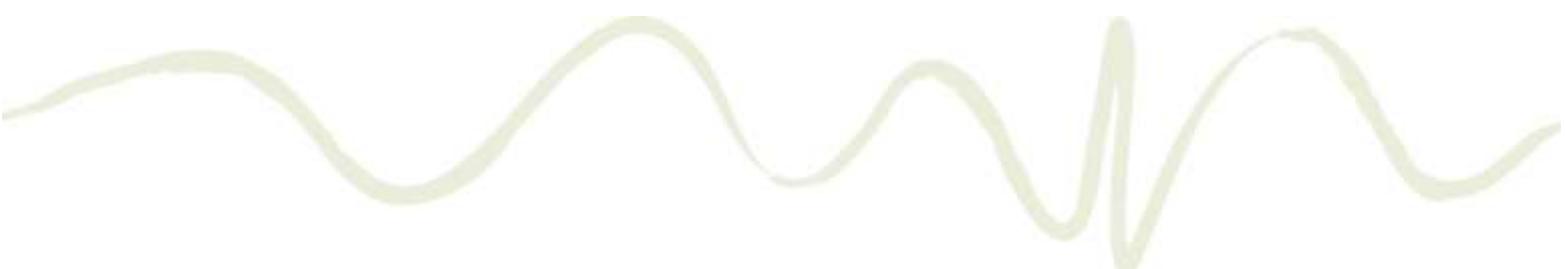
Discussion

Ensure construction waste is being placed in bins or recycling containers and that staff are educated on the importance of securing waste.

3.2 Environmental Protection License

JHG holds Environmental Protection Licence (EPL) 20960 issued by the EPA for the scheduled activity of 'land based extractive activities' for the "Clarence Correctional Centre Construction Site". There were several notices to the EPL given during the reporting period as summarised below:

- Notice 1557808, 18 October 2017: The EPA issued a s91 Clean Up Notice following sediment basins 1, 2 and 3 failing, and sediment and erosion controls not being implemented in accordance with the 'Progressive Erosion and Sediment Control Plan' for the site. As a result this clean up notice was issued.
- Notice 1559966, 19 December 2017: Penalty Notice for contravening conditions of a license.
- Notice 1562125, 27 February 2018: This notice was for a variation to the EPL for a number of matters including water discharge point, construction hours, Progressive Erosion and Sediment Control Plan inspections,
- Notice 1570772, 22 October 2018: This notice was for a variation to the EPL regarding extended working hours.



The EPL Annual Return for 2017/18 was not available.

3.3 Summary

Overall, environmental management of the construction of the Clarence Correctional Centre is satisfactory. There appears to have been improvement on the environmental management since mid-2018. The EPL notice issued in 2017 has been effectively addressed. There was a high level of awareness of environmental management responsibilities amongst the JHG personnel interviewed. During the site inspection, overall environmental controls were observed to be adequate however maintenance was required on some areas. In general, the environmental documentation for the site is up-to-date.



4. Recommendation

4.1 Recommendations

A number of recommendations are provided in **Section 3** above. The following section summarises these recommendations.

- *Section 3.1.1:* The site has a PESCP which is prepared by JHG environmental staff and checked and certified by the CPESC, Soil Conservation Service. This requirement relates to ensuring that all personnel are made aware of the ESCs on the site and are then able to ensure they note issues and corrections. The PESCP should be shown and discussed at the staff site induction and displayed on the noticeboard to allow staff to review the ongoing revisions.
- *Section 3.1.2:* During the site inspection, a number of erosion and sediment control matters were raised and noted above. The SWMP has been prepared and approved consistent with the MCoA. The project has managed the site's water by using this management plan and implementing the design plans and recommendation as prescribed. It is accepted that the site had significant rain prior to the site audit, however it is strongly recommended that these erosion and sediment control issues are remediated as soon as possible following these rain events.
- *Section 3.1.3:* The SWMP has been prepared and approved consistent with the MCoA. Management of stormwater pits is outlined in section 5.2.5 Inlet Filters. Ensure all pits are cleaned, erosion and sediment controls reinstated and are functioning to standard pursuant to the requirement in the SWMP.
- *Section 3.1.4:* Section 3.6 of the SWMP discusses the methodology for bunding mulch stockpiles. Inter alia, due to the risk of tannin release, it is important to ensure that mulch stockpiles are bunded appropriately, including the use of earth as bunding material. The project should ensure this mulch stockpile area bunding is reinstated as shown on the PESCP.
- *Section 3.1.5:* It is noted that the site has a diverse range of workers undertaking various tasks on-site from production of large pre-cast concrete units, to electrical tradesman with little environmental risks. However, it is important that storage and containment of chemical and fuels is undertaken within the expected industry practices, including containment. For this reason, all chemicals and fuels should be stored within impervious secondary containment facilities.
- *Section 3.1.6:* Ensure the L90 is recorded on the Noise and Vibration Monitoring Summary sheets. The RION noise meter has the ability to self-calibrate however the Noise and Vibration Management Plan requires a field calibration, before and after. Calibration is essential to ensuring that the noise records are correct. Advice should be sought on where the self-calibration is acceptable or whether the unit requires a field calibration.
- *Section 3.1.7:* The site had experienced rain the night before the inspection and it appeared that this led to the mud tracking along Avenue Road. A rumble grid and wheel wash are installed at the entrance for vehicle leaving the site which was working well. Ensure that a street sweeper is employed when the public roads experience mud tracking.
- *Section 3.1.8:* The Flora and Fauna Management Plan should be amended to remove reference to the Landscaping and Rehabilitation Plan. A reference to the Landscape Plan could be included.
- *Section 3.1.9:* Ensure construction waste is being placed in bins or recycling containers and that staff are educated on the importance of securing waste.



References

Independent Audit: Post approval requirements June 2018; [Online]. Available:
<https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/independent-audit-post-approval-requirements-2018-06.pdf>

Environmental Audit Guidebook; Thompson Reuters.



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Appendix A
Audit Methodology



Appendix B

Audit Table

Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
A17.	The Department must be notified in writing to compliance@planning.nsw.gov.au immediately after the Applicant becomes aware of an incident.	View two incident reports and emails between JHG to DPE.	Email comms between JHG and DPE (28 September 2018) regarding a hydrocarbon spill from an excavator . Email sent to James Epstein and DPE compliance email address notifying them of the spill with the specific information as required by the incident report which addresses the matters as shown in A18. Email comms with DPE (10 October 2018) excavator hydraulic spill. Email send on the 19th October 2018).	Compliant
B29.	The Applicant must submit a copy of the CNVMP to the Department and Council prior to the commencement of works approved under this consent.	Sited Letter (9/2/18) from DPE to JHG noting the du Chateau Chun (Private Certifiers).	BCA consultant (Du Chateau Chun) compiled a report which assessed each condition of approval to ensure compliance prior to issuing a CC. Reviewed emails and letter from DPE.	Compliant
B31.	The Applicant must submit a copy of the CWMP to the Department and Council prior to the commencement of work approved under this consent.	Sited Letter (9/2/18) from DPE to JHG noting the du Chateau Chun (private Certifiers).	BCA consultant (du Chateau Chun) had to compile a report which assessed each condition of approval to ensure compliance prior to issuing a CC. Reviewed emails and letter from DPE.	Compliant
B49.	Compliance Reporting A Pre-Construction Compliance Report must be prepared for the development and submitted to the Certifying Authority for approval before the commencement of works approved under this consent. A copy of the endorsed compliance report must be provided to the Department at compliance@planning.nsw.gov.au before the commencement of works approved under this consent.	Sited email from DPE to Mark Turner (JHG) advising that the PCCR had been approved (9/2/2018)	On the 9 February 2018 DPE approved the PCCR and sent an email to Mark Turner, JHG Environment Manager. DPE representative was Katrina O'Reilly.	Compliant
B51	Prior to commencement of construction works approved under this consent, the Pre-Construction Compliance Report must be approved by the Secretary.	Sited email from DPE to Mark Turner (JHG) advising that the PCCR had been approved (9/2/2018)	On the 9 February 2018 DPE approved the PCCR and sent an email to Mark Turner, JHG Environment Manager. DPE representative was Katrina O'Reilly.	Compliant
C1.	Hours of Work	Induction Booklet.	The site Induction booklet has the approved hours of work in it which required updating to include the extended hours. Slide 5.	Compliant

Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>a. Construction, including the delivery of materials to and from the site, may only be carried out between the following hours:</p> <ol style="list-style-type: none"> i. between 7.00 am and 6.00 pm, Mondays to Fridays inclusive; and ii. between 8.00 am and 5.00 pm, Saturdays. <p>b. No work may be carried out on Sundays and public holidays.</p> <p>c. Works may be undertaken outside these hours where:</p> <ol style="list-style-type: none"> i. works are inaudible at the nearest sensitive receivers; or ii. the delivery of vehicles, plant or materials is required outside these hours by the Police or other public authorities; or iii. it is required in an emergency to avoid the loss of life, damage to property and/or to prevent environmental harm; or iv. works are undertaken in accordance with an approved Environmental Protection Licence under the Protection of the Environmental Operations Act 1997; or v. a variation is approved, in advance, in writing by the Secretary or her nominee. 	<p>Sited signed agreements with Julie McDonough at 37 Old Six Mile Land, Lavadia.</p> <p>There were a total of three residents who had signed an agreement with JHG.</p> <p>Noise modelling and report (by Wilkinson Murray report) was undertaken which showed three residents needed approval.</p>	<p>Negotiated resident agreements for amended hours had been signed for:</p> <ul style="list-style-type: none"> ■ Monday to Friday - 6.00 am to 10.00 pm ■ Saturday and Sunday – 7.00 am to 5.00 pm for limited works. <p>Monitoring results are included in the CCR.</p>	
C2.	<p>Approved Plans to be On-Site</p> <p>A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept on the Subject Site at all times and must be readily available for any officer of the Department, Council or the Certifying Authority.</p>	<p>Sited MCoA hard copy on desk and server and presentation board.</p>	<p>Design Plans and management plans are available online and hard copies were kept on file, including the EPL for the site. There was also a large electronic presentation board with the approved plans (Photograph 1). All docs are in place.</p>	Compliant
C12.	<p>Site Notice</p> <p>A site notice(s) must be prominently displayed at the boundaries of the Subject Site for the purposes of informing the public of project details</p>	<p>Sited on entry to the site.</p>	<p>On entry to the site and on the site inspection these were inspected.</p>	Compliant



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	<p>including, but not limited to the details of the Builder, Certifying Authority and Structural Engineer. The notice(s) is to satisfy all but not be limited to, the following requirements:</p> <ul style="list-style-type: none"> a. minimum dimensions of the notice are to measure 841 mm x 594 mm (A1) with any text on the notice to be a minimum of 30 point type size; b. the notice is to be durable and weatherproof and is to be displayed throughout the works period; c. the approved hours of work, the name of the site/ project manager, the responsible managing company (if any), its address and 24 hour contact phone number for any inquiries, including construction/ noise complaint are to be displayed on the site notice; and d. the notice(s) is to be mounted at eye level on the perimeter hoardings/ fencing and is to state that unauthorised entry to the Subject Site is not permitted. 			
5.8.1 Complaints	<p>Complaints may be received from various sources within the community or from other stakeholders. These include community groups, clients, interested parties, sensitive receivers etc. A verified complaint may advise of practices, activities or processes which do not conform to environmental system requirements. On receipt of a complaint, the PER shall record the necessary details and investigate the details of the complaint as per the Internal and External Communication procedure JH-MPR-CCM-001. If it is confirmed, the PER will complete JH-FRM-SQE-010-02 Incident Notification and Investigation Report if an impact has occurred or a JH-MPR-SQE-007 Non-conformance Report</p>	<p>Six Monthly Report Construction Compliance Report. Project Pack Website - Complaints Register. On line. EPA Email to JHG (24/12/18) Email complaint on dust (2/7/18)</p>	<p>24 December 2018 - EPA received a complaint regarding discharge of dirty water from a detention basin. JHG prepared and sent a summary response to EPA on the 31st December and then on the 9th January a detailed response was prepared and issued to the EPA. There was no requirement for an incident report as the basin was licensed. Matter was closed out. Dust complaint from resident. Dust information was then provided to the resident and the matter was closed out (email 2/7/18).</p>	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>shall be raised within the John Holland Event Management System (JHET) and directed to the respective staff member for action.</p> <p>Upon completion of corrective action the staff member shall document the action taken and return the document to the PER. The PER shall verify that the corrective action taken is suitable and effective. Upon satisfactory verification, the PER shall ensure that an appropriate response is provided to the originator of the complaint.</p> <p>If the complaint is not confirmed, the PER shall contact the originator of the complaint to determine the course of action to resolve the issue.</p>			
5.8.2 Incidents	<p>Any incident with actual or potential impacts on the biophysical environment (such as a spillage of chemicals) shall be recorded and addressed by the PER as detailed in JH-MPR-SQE-010 Incident Management and Investigation.</p> <p>All incidents will be investigated as soon as possible after the event and communication made with the client and regulatory agencies if required. In addition, the Operations Environment Manager will be notified of all environmental events within 12 hours. If the event has the potential to or causes material harm to the environment, then there may be a requirement to notify the Environmental Protection Agency (EPA). The OEM will assist with any notifications to the EPA.</p> <p>The Project Manager shall establish an investigation team to investigate all environmental incidents. Completion of corrective actions identified through the investigation shall be verified as completed via follow up checks by the PER and signed off as completed in the investigation report. On completion of all</p>	<p>Incident Management and Investigation and Project Pack Website and email (2/7/18)</p>	<p>Sited the JHG incident management system and followed an EVT-1101439 200 diesel spill to ground from generator incident report. Observed event details, notification, investigation and follow up. All parts of the data base were completed and followed up.</p> <p>Inspected another four 2A/2P incidents.</p>	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<p>corrective actions, the Project Manager shall sign off the incident report as completed and closed. Incidents will be addressed in consultation with the Client (or their representative) where required. In terms of external reporting of incidents the following requirements are to be met as a minimum:</p> <ul style="list-style-type: none"> ■ Department of Planning and Environment to be notified of all 2A/2P or higher incidents. This is to be via an email notification within 24 hours. ■ Incident notification must include: <ul style="list-style-type: none"> - Project and application number - Details of the incident - How incident was detected - When incident was observed - Any actual or potential non-compliance - Immediate actions - Further actions - Project contact (PER) ■ Follow up report within seven days that includes information on: <ul style="list-style-type: none"> - A summary of the incident - Outcomes of any investigation - Details of corrective actions - Details of any communication with other stakeholders 			
SW1	Prior to works commencing, develop a site (or area) specific Primary Erosion and Sediment Control Plan (ESCP) highlighting the locations and detailing site wide erosion and sediment controls.	SWMP. Currently on Rev 2.	A Primary ESCP was prepared prior to construction and is contained within the Soil and Water Management Plan which was approved by DPE.	Compliant
SW2	The risks associated with the management of erosion and sedimentation in relation to particular construction activities are to be identified and mitigation controls elected in accordance with the JH Safety, Quality & Environment Risk	PESMP viewed.	The risks and management measures are contained in the Primary ESCP. Peter Menzies (CPESC) of Soil Conservation Service endorsed and signed the plans. Revision 2. PESCP reviewed and is currently being updated.	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	Management Procedure.			
SW3	Design and installation of erosion and sediment control devices in accordance with the document Managing Urban Stormwater – Soils in Construction Volume 1 'Blue Book' (2004, Landcom). Controls to be downstream of exposed or disturbed areas and adjacent to nearby watercourses/ drainage lines. Examples of erosions and sediment controls to be implemented may include, but are not limited to: <ul style="list-style-type: none"> Physical demarcation of 'no-go' zones in order to retain existing vegetation/ groundcover; Sediment basins; Clean and dirty water diversion drains; Rock checks within diversion drains; Sandbags, gravel socks and/or geo-fabric; Sediment fences; and Sterile straw bales and/or coir logs. 	PESCP prepared Rev 2.	The PESCP includes a variety of controlled designs to manage stormwater on the site. The Plan is appropriately detailed and signed off by a CPESC. There were a number of specific comments on ESCs on the site which are addressed in the site inspection notes.	Compliant
SW6	Erosion and sediment controls are to be installed in accordance with the approved ESCP(s). A preliminary ESCP is located in Appendix 1 of this ECP and will be updated as the site changes and the ESCP needs updating.	PESCP prepared Revision 2. Currently updating to Revision 3.	ESCs appeared to have been installed as per the PESCP. The plan was in the process of being updated as works had progressed to a point that requires the plan to be reviewed and updated. A number of ESC matters were highlighted during the site inspection for improvement.	Compliant
SW7	A stabilised construction access/egress will be established where construction traffic enter or leave from a public road.	Site Inspection	Construction access points included submerged rumble grid and wheel wash.	Compliant
SW14	All project personnel shall be made aware of erosion & sediment control devices at induction and the ESCP is to be displayed in prominent location at site sheds.	Inspected site notice board and induction material.	The compound site includes a site notice board. It is recommended that the PESCP be pinned to the notice board to ensure staff are made aware of the ESC design and requirements.	Non-compliant
SW16	Erosion and sediment controls shall be cleaned or replaced prior to accumulated sediments and obstructions reducing their effective operating	Site Inspection.	<ul style="list-style-type: none"> Water discharge point at Sediment Pond 3 had been tracked across compromising water quality at discharge point. Ensure these areas are 	Non-compliant



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	capacity by 60%. Controls which are damaged or otherwise rendered ineffective shall be immediately replaced.		<p>flagged off to stop vehicles and the site repaired.</p> <ul style="list-style-type: none"> Male Max South West corner temporary storage basin to sediment Basin 5 requires significant repairs and redesign to ensure the damage does not occur again. 	
SW19	All stormwater drainage inlets and other discharge points where there is potential for sedimentation to occur as a result of construction activity shall be protected by geofabric and/or sandbags as appropriate.	Site Inspection	Stormwater pits (i.e. in Men's Max area) require cleaning out and reinstating. Several pits throughout the site appeared to be damaged from recent rains. Ensure all pits are cleaning and functioning.	Non-compliant
SW24	Long term (greater than 10 days) stockpiles, batters and other erosion sensitive areas shall be adequately stabilised through velocity reduction covering, grassing, vegetation, soil binding, water diversion or other as appropriate.	Site Inspection	Mulch stockpile area required bunding to be repaired and/or installed.	Non-compliant
SW31	Topsoil will be stockpiled separately from other materials on-site.		Topsoil stockpiles had been stabilised through revegetation.	Compliant
SW41	No refuelling, stockpiling or chemical storage to occur near stormwater drainage points.	Site Inspection.	It was noted on the site inspection that some fuel containers were not being stored in bunded containers. Ensure all fuel is kept in bunded containers.	Non-compliant
SW47	All run off emanating from the site must be effectively filtered or otherwise treated so that the water quality meets water discharge limits specified in Section 3.2.	Water Monitoring Permits	<p>WMP records showed pH, turbith and TSS. All JHG staff must complete and have approved by environmental staff prior to discharge. This information is also included on the monthly EPL reporting.</p> <p>EPL allows discharge of water over 37mm event (85th percentile).</p> <p>Sampling and testing prior to discharge.</p> <p>There is one discharge point at each sediment basin.</p>	Compliant
SW49	No discharge of surface or groundwater is to occur unless the water quality is within project WQO limits set out in Section 3.2. Where compliance with WQOs is not met, water shall be	JHG have a diarised notes system to track water testing and treatment.	Inspected notes from 11/1/2019 showing Sediment Basin 3 was flocculated by adding gypsum. Notes also showed the water testing and treatment prior to discharging.	Compliant

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	treated as per detail in Section 6.0. Field testing by the PER shall record compliance with project WQOs prior to discharge.			
SW56	Details of field observations shall be reported via the Enviro Inspection Checklist, and communicated to all staff during prestart, toolbox and/or team meetings.	Post Rainfall Environmental Inspection Checklist Environmental Inspection (General) Minutes from Coordination meeting (Clarence Correctional Centre Civil and Services Meeting No. 44) on the 12/12/18.	Staff prepare inspection reports and these were completed. Weekly contractor meetings are used as a means to discuss environmental matters. Prestart is with the entire site workforce (~1100), hence there is a better way to discuss environmental matters with staff, which has typically been through specific directed actions such as dealing with contractors, highlighting issues at contractor meeting (reviewed minutes) and including environmental matters on the notice board as part of the "Green Wednesday" initiative.	Compliant
SW60	The JH Project Director shall notify the client of all significant incidents and valid complaints, verbally within two hours, and in writing within 24 hours.	Email of 14 December 2018 re diesel spill	Viewed email of the 14/12/18 from Tiffany Jones comms with Northern Pathways and Infrastructure NSW of an oil spill including the details such as time, place and quantity,	Compliant
SW61	All monitoring results are to be recorded on the Project Pack Web.	Project Pack Web inspection results and photos and whom took the samples.	It appears noise, dust, water (internal and external) records have been maintained.	Compliant
SW63	A summary of incidents, valid complaints and monitoring results (if any) shall be provided monthly to the client and include the actions that were taken to address the incident/ complaint.	Project Pack Web inspection results and photos and whom took the samples.	The complaint register, incident register and the monitoring results for the air, water, noise are recorded in the Project Pack Web and available. A monthly summary is provided to the client.	Compliant
SW64	In accordance with the Project Approval (SSD_7413), condition C9, JH shall make available to the public on its website, regular reporting on the environmental performance of the development, in accordance with the reporting arrangements in any plans approved under the conditions of the consent. The information shall be kept up to date.	http://www.johnholland.com.au/our-approach/environmental-sustainability-disclosure/	Information is on the JH website.	Compliant
NV 6.5	However, we recommend that compliance monitoring of ground borne vibration is carried out		There have been no vibration based complaints.	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	at the nearest residence if complaints of unacceptable vibration are made by nearby residents. Refer to Section 7.13 for the mitigation measures to be engaged to reduce the impact of adverse vibration.			
NV 7.0	<p>However, given the wide range of activities and the large area over which the works will take place, the following work practices will be implemented where necessary and practicable, to ensure compliance throughout the project.</p> <ul style="list-style-type: none"> ■ Works will be staged to minimise noise impact, ■ Substitution of equipment will be considered to minimise noise ■ Activities required to be conducted outside of the standard hours will be undertaken in accordance with the OOH protocol in Section 7.10. 	Management plans and noise assessments.	<p>Works were split into two stages - Stage 1 earthworks/ Stage 2 buildings and structures. Self-performed all heavy lifting with cranes to ensure service and maintenance. JHG purchase new plant and equipment for the project</p> <p>Following noise exceedances at the concrete batch plant, quackers were installed on some of the equipment.</p> <p>All noisy activities are undertaken within the daylight time.</p> <p>There is a large buffer between the site and residents (500m+)</p>	Compliant
NV 7.2	<p>Attended measuring at nearby residential dwellings should be carried out in response to complaints from neighbours. The measurements will be conducted in accordance with the procedures outlined in Australian Standard AS1055 Acoustics – Description and measurement of environmental noise and in accordance with methods outlined in the NSW Industrial Noise Policy (INP). The following points should be followed when conducting noise monitoring:</p> <ul style="list-style-type: none"> ■ A field calibration should be conducted before and after measurements; ■ The sound level meters must be set to A-weighting and Fast response; ■ The sound level meters sample period should be set to 15 minutes; 	Noise and Vibration Monitoring Summary Sheet.	<p>There has been a total of two noise complaints on the project.</p> <p>In response to the noise complaints, monitoring has been undertaken. The Noise and Vibration Monitoring Summary sheet was completed and inspected. All information was included.</p> <p>Noise monitoring has been undertaken regularly for the last 18 months at the perimeter to check that the real noise levels were within the modelled noise levels.</p>	Compliant



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	<ul style="list-style-type: none"> ■ The following descriptors should be measured as a minimum: LA1, LAeq and LA90; and ■ Measurements should be conducted a minimum of three metres from the nearest façade and/or solid fence/ wall. If it is not possible to do this corrections for façade reflection should be applied to the measurement results. 			
NV 7.4	<p>The following information must be included in noise monitoring reports when applicable:</p> <ul style="list-style-type: none"> ■ Field calibration results (before and after measurements); ■ Measurement times and dates; ■ Qualitative description of the noise environment during measurement; ■ LA1, LAeq and LA90 levels; ■ Meteorological conditions during the measurements; ■ Estimation of recorded noise contribution from other major noise sources. <p>The Construction Contractor Project Manager shall establish and maintain a system of records which provides full documentation of all noise monitoring results, complaint handling and responses to non-compliances. The Construction Contractor Project Manager shall establish and maintain procedures for the collection, indexing, filing, storage and maintenance of the records.</p>	<p>Noise and Vibration Monitoring Summary in PPW. Viewed sheet from noise monitoring undertaken on 15/3/2019.</p>	<p>Reports include this information however on a number of summary sheets the L90 was missing. Ensure the L90 measurement is always recorded. The metre does not have an external field calibration device, alternatively it has the ability to self-calibrate (RION), which appears suitable.</p>	Non-compliant
NV 7.6	<p>Workers and contractors shall be trained in work practices to minimise noise emission such as the following:</p> <ul style="list-style-type: none"> ■ Avoid dropping materials from a height. ■ Avoid shouting and talking loudly outdoors. ■ Avoid the use of radios outdoors that can be heard at the boundary of residences. ■ Turn off equipment when not being used. 	OOHW Permit OH-CC-11/ OH-OO-16	<p>Safety Management includes notifications and toolboxes on dropping and shouting on-site. OOHW permits include initiatives to minimise noise including leaving/ arriving site quietly, no use of horns, no door slamming. Workers are inducted on noise minimisation before any OOHW is undertaken.</p>	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ■ Carry out work only within the approved hours of operation. <p>Activities required to be conducted outside of the standard hours will be undertaken in accordance with the OOH protocol in Section 7.10.</p>			
Heavy Vehicles and Staff Vehicles	<p>The following points shall be implemented in conjunction with the Construction Traffic and Pedestrian Management Plan (CTPMP), as required under Condition B19 of the Stage 1 Consent.</p> <ul style="list-style-type: none"> ■ Truck drivers shall be informed of designated vehicle routes, parking locations, acceptable delivery hours or other relevant practices (for example, minimising the use of engine brakes, and no extended periods of engine idling). ■ Site vehicle entrances shall be located no closer than 600 m from residential premises. ■ The number of vehicle trips shall be configured to reduce the number of trips to and from the site – movements shall be organised to amalgamate loads rather than using a number of vehicles with smaller loads. ■ Staff parking areas shall be located within a dedicated area within the site. ■ Parking and queuing of staff vehicles and other construction vehicles shall be avoided as far as is practicable on streets outside of the site. ■ All vehicles operated within 300 m of the northern boundary shall be fitted with broadband reversing alarms or alternative, non-tonal proximity warning systems. 	<p>Construction Traffic Management Plan which includes the Driver Code of Conduct (Appendix C). Driver Charter (for contractors)</p>	<p>The Construction Traffic Management Plan includes the Driver Code of Conduct. The Driver code of conduct includes the matters as set out in the requirements and is also included in the site induction for new staff. The Driver Charter has also been prepared for new contractors and is reviewed and signed as part of the Induction process.</p>	Compliant
NV 7.8 Community Relations	<ul style="list-style-type: none"> ■ A Community and Stakeholder Manager shall to be appointed by the contractor prior to the commencement of any works; 	<p>Consultation Manager database Communications and Community Relations Plan</p>	<p>Community Relations relevant to Stage 2 include: There is a Community and Stakeholder Manager on staff - Tiffany Jones</p>	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ■ The manager will approach all potentially affected residents prior to the commencement of any works as an initial introduction and provide their contact details; ■ The manager will explain the project, duration of works, potentially noisy periods as well as determine any particularly sensitive receivers or sensitive time periods and schedule works accordingly, as far as reasonably practical; ■ A community information telephone number has been established to provide access and information about the project. The telephone number is 1800 449 848 and is the primary contact number for inquiries from the community. It is accessible 24 hours a day, seven days a week. ■ An email address has been established to manage correspondence and to provide access and information about the project. The email address for all enquiries is info@northernpathways.com.au ■ A postal address has been established to manage correspondence and to provide access and information about the project. The postal address for all enquiries is GPO Box 508, SYDNEY, NSW, 2001. ■ A newspaper advertisement shall be prepared and placed in local media at least seven days in advance, where there are significant out-of-hours work that have the potential to impact the community, and or at key project milestones that are of interest to the community. ■ Information would typically include an overview of work, including specific construction information, expected duration, and the above contact details for complaints and correspondence. 	<p>https://northernpathways.com.au/contact-us/</p>	<p>The website has an email address, postal and phone number - It is noted the postage address is different that listed in the Management Plan. Community Newsletters have been prepared, distributed and uploaded to the website. Drop in sessions have been held (discussions with Enviro and Consultation Staff).</p>	



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	<ul style="list-style-type: none"> ■ Community notifications and newsletters shall be prepared and distributed, at least seven days prior to commencement of any works, to the community in areas that are potentially affected by the project. The contents of the notifications shall include information on the nature of the works, location of works being carried out, possible impacts to amenity, traffic flow or services, and the contact details as listed above. ■ Community drop-in sessions shall be organised to engage with the community and to provide a conduit for direct consultation between those affected, or with an interest in the project, and the project team. To encourage the widest attendance and accessibility to the community, drop-in sessions shall be arranged outside of business hours such as weeknights or on Saturday. ■ Information cards with the above contact details shall be prepared and distributed to the project management team and other staff on-site. These cards shall be given to members of the community. 			
NV 7.9 Managing a Noise Complaint	<p>The Community and Stakeholder Manager shall receive and manage noise complaints and implement a Construction Complaints Management System.</p> <p>All complaints shall be treated promptly and with courtesy.</p> <p>In the event that a noise complaint is received, noise monitoring will be carried out at the affected receptor location and appropriate measures be taken to reduce the noise emission as far as reasonably practicable. If the NML is found to be exceeded, works on the site will stop and site staff determine the best method of reducing the noise</p>	<p>Consultation Manager (consultation database)</p> <p>JHG email comms following a noise complaint - TJ 2/7/18</p> <p>Communications and Community Relations Plan</p>	<p>Reviewed a JHG response to a noise complaint from a neighbour. In response, JHG took noise measurements (noise was within criteria), liaising with the neighbour, offering mitigation measures and asking for more information of the source of the noise complaint and offering to address the noise directly.</p>	Compliant



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	<p>based on the mitigation measures described in this CNVMP. Noisy works will be restricted to outside the nominated respite periods. Where it is not practicable to stop the noise, or reduce the noise, a full explanation of the event taking place, the reason for the noise and times when it will stop shall be given to the complainant. The following guidelines are recommended in Section 6 of the Interim Construction Noise Guideline to manage a noise complaint:</p> <ul style="list-style-type: none"> ■ Provide a readily accessible contact point, for example, through a 24 hour toll-free information and complaints line. ■ Give complaints a fair hearing. ■ Have a documented complaints process, including an escalation procedure so that if a complainant is not satisfied there is a clear path to follow. ■ Call back as soon as possible to keep people informed of action to be taken to address noise problems. Call back at night-time only if requested by the complainant to avoid further disturbance. ■ Provide a quick response to complaints, with complaint handling staff having both a good knowledge of the project and ready access to information. ■ Implement all feasible and reasonable measures to address the source of complaint, which may include standing equipment down. ■ Keep a register of any complaints, including details of the complaint such as date, time, person receiving complaint, complainant's contact number, person referred to, description of the complaint, work area (for larger projects), time of verbal response and timeframe for written response where appropriate. 			



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NV 7.10 Out-Of-Hours Work Protocol	<p>Any work proposed to be conducted out of standard construction hours shall be subject to approval by the Environmental Representative. Details of proposed work shall be submitted for evaluation which will include; location of work to be conducted, types of plant and equipment proposed, character and likelihood of noise being generated, anticipated effect on traffic flow to and from the site.</p> <p>In the event that it is unavoidable to conduct work outside of standard construction hours and work is likely to be audible at residential premises, an acoustic assessment shall be carried out to determine the extent of potential exceedance, recommendations for reasonable and feasible noise mitigation measures to be employed and predicted levels at the nearest sensitive receptors. The relevant local council, residential areas and other sensitive receivers and stakeholders that are potentially affected by any work approved to be conducted outside of standard construction hours shall be notified at least seven days prior to the commencement of work. Methods of notification may include letter drops, door-knocking, publications in local media and on the Northern Pathways website (http://www.northernpathways.com.au). The Community Liaison Officer shall promptly be informed of all work approved outside of standard construction hours to allow appropriate time to arrange community notifications.</p>	OOHW OH-CC-028	Agreements have been made with the three surrounding residents. The OOHWs are assessed and a new Construction Noise Assessment (Oct 2018) was prepared by Wilkinson Murray for the OOHWs. This together with three noise agreements now make up the construction noise management. DPE and EPA were sent information on the agreements and new working hours. The EPL was amended with the new construction hours.	Compliant
AQ17	Public roads adjacent to site access/ egress points shall be inspected daily for soil or mud build-up as a result of construction activities. Surfaces shall be cleaned as appropriate for the road conditions.	Environmental Site Diary Weekly Inspection Checklist Post Rainfall Environmental Inspection Sheet (23/3/19)	There is no specific daily environmental inspection sheet, rather a diary is used to note each environmental issue. Rumble grid and wheel washes are in place PREIS from 23/3/19 includes a note regarding mud tracking.	Non-compliant



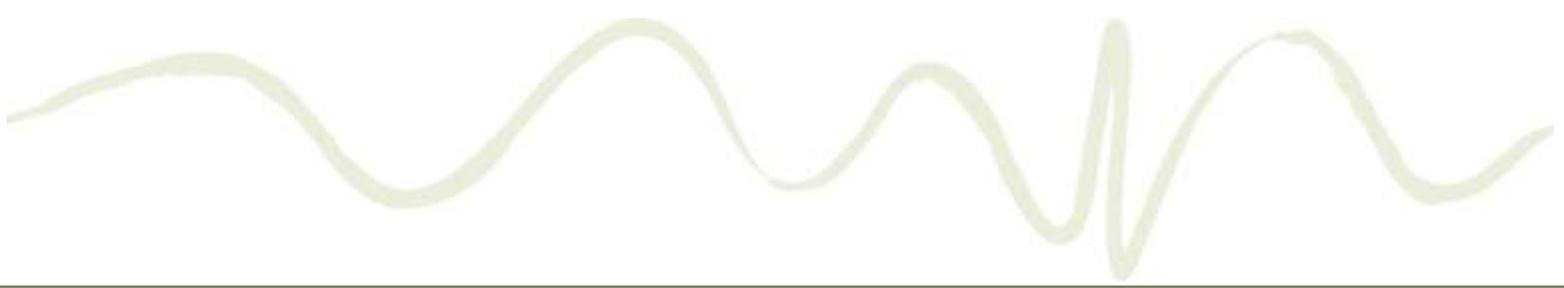
Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
			Mud tracking along Avenue Road was noted during the site inspection.	
AQ18	Any excessive air quality or visual amenity issues shall be recorded on the Enviro Inspection Checklist. Informal daily observations to be recorded in site diaries – including consideration of weather conditions and certain activities with a high dust generation potential.	Weekly Inspection Checklist Environmental Diary	The WIC has a standard section for Air Quality and Visual Amenity. Viewed the Air Quality and Visual Amenity section of the 4/3/19 to the 8/3/19 which had all been completed.	Compliant
AQ22	Details of field observations shall be reported via the Enviro Inspection Checklist, and communicated to all staff during pre-starts, toolbox and team meetings.	Weekly Inspection Checklist Clarence Correctional Centre Civil and Services Meeting 44	This has not been occurring. Site prestarts have ~1,100 persons attending (with many trades) and therefore it was considered too broad and too many to have a positive impact. Alternatively, other initiatives such as "Green Wednesday" and using the contractor meetings to deliver these results.	Compliant
AQ28	A summary of monitoring results is to be provided monthly to the client.	Monthly Client Report - January 2019	The following monitoring data was included in the monthly client report, noise, dust, water quality and photo monitoring.	Compliant
FF29	The Landscaping and Rehabilitation Plan describes in detail the management strategies regarding rehabilitation on the Project. The Landscape Management Plan will consider a range of constraints and opportunities associated with the Project including collection and propagation of local seed, salvage and reuse of topsoil and woody debris. The Landscape Management Plan will aim to revegetate buffer lands using the same species composition and structure as currently exists on the site and includes a program for monitoring and maintenance of plantings.	Landscape Plan and Specification.	There is no Landscaping and Rehabilitation Plan. The FF plan should be amended to remove reference to this. A Landscape Plan and Specification is in place.	Non-compliant
FF32	Ecological monitoring during construction will comprise weekly inspections of all areas of the Project, documented in the Environmental Site Inspection Checklist which will be developed in conjunction with the environmental representative (ER) prior to work commencing. The effectiveness	Weekly Inspection Checklist	Flora and Fauna inspections are included in the weekly Inspection Checklist	Compliant

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	of flora and fauna mitigation measures must be included in the inspections, including effectiveness of fauna habitat augmentation (e.g. nest boxes and woody debris), demarcated protection boundaries.			
W1	Energy, water and waste reduction measures are to be implemented in the offices and site sheds and communicated in toolboxes. Initiatives may include, but should not be limited to: <ul style="list-style-type: none"> ■ Procurement of Australian made FSC or recycled office paper ■ Recycling bins in site sheds ■ Other initiatives as appropriate. 	On Wednesday during the Weekly Toolbox they have an Environment emphasis.	Rubbish Recycling Each Wednesday ("Green Wednesday") the Environmental Team send a weekly toolbox outlining an environmental initiative. The site is up to 64. Latest one has information on Earth Hour. Recycling bins are located throughout the compounds site and cafeteria/ crib rooms.	Compliant
W2	Engage an appropriately licensed waste contractor to manage the identified waste streams. Contractor to provide monthly reports detailing: <ul style="list-style-type: none"> ■ Date(s) of waste pickup ■ Description of waste ■ Cross reference to relevant waste transport documentation ■ Quantity of waste ■ Origin of the waste ■ Destination of the waste (for regulated wastes) ■ Intended fate of the waste, e.g. re-use, recycling, or disposal. 	R Richards have been engaged to manage waste onsite. Waste records are kept on the PPW	The Waste Contractor, JR Richards is responsible for: <ul style="list-style-type: none"> ■ General Waste ■ Paper and cardboard ■ Timber. As part of the Contractors responsibility they must recycle materials such as metal, which occurs onsite. Waste information is included in the record on the PPW. Register was inspected.	Compliant
W3	The following licence records are to be obtained from any waste subcontractor engaged: <ul style="list-style-type: none"> ■ Name of waste subcontractor ■ Address ■ Waste streams to be handled, transported, stored and/or disposed of by the waste subcontractor ■ EPL number ■ Landfill(s) used by waste subcontractor 	Inspected PPW waste contractor register	EPL are held by the two waste contractors; McLennans and JR Richards. All information held in the JHG PPW data base.	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ■ Landfill(s) EPL number. 			
W7	<p>Implement appropriate waste management practices to ensure that the site is maintained in a clean and tidy state with regard to litter and materials storage. Measures may include:</p> <ul style="list-style-type: none"> ■ Regular inspections, ■ Stop work, ■ Area cleans, and ■ Pre-start checks. <p>All work areas to be tidied and free of litter each day.</p>	Weekly Inspection Checklist	<p>The following waste streams apply to the site:</p> <ul style="list-style-type: none"> ■ General Waste - no recyclable. ■ Household recycling (can and bottles) – recycling ■ Styrofoam – recycling ■ pallet – recycling ■ steel – recycling ■ Making topsoil and mulch – reuse ■ Stormwater – recycling. 	Compliant
W13	<p>Hydrocarbon contaminated soil and any other hazardous waste to be managed and disposed of according to its waste classification and relevant legislative requirements. Depending on size of contamination appropriate protection, storage, testing, and remediation to subsequently occur. All hazardous material will be disposed of at a licensed facility (Grafton Regional Landfill) and in accordance with the Project Environment Protection Licence EPL # 20960.</p>	JHG Stage 1 Remediation and Validation Works (25 March 2019) 754-COFH00168AA-R01)	<p>Five litre drums remain onsite to be recycling - Campbells Auto Wrecking. Ditchfield take oil to Southern Oil Collection - EPL No. 11408 JHG engaged Coffey to classify and remediate the soil from the diesel spill. Viewed the report.</p>	Compliant
W17	<p>Wastes shall be generally monitored on a daily basis to ensure that any materials which may cause land and/or water contamination or create odour problems are removed from the site in an appropriate manner.</p>		<p>It was evident during the site inspection that some waste was not being placed in waste bins, including polystyrene. Ensure the site is kept free of waste.</p>	Non-compliant
W21	<p>A waste register shall be maintained for the duration of the project. The register shall include the following details:</p> <ul style="list-style-type: none"> ■ Waste description and coding (if applicable) ■ Date of pickup of waste ■ Cross reference to relevant waste transport documentation ■ Quantity of waste ■ Origin of the waste 	PPW	<p>The waste register is document register that is maintained with this information in it is known as the PPW. A report is then prepared based on the waste information that is uploaded. Inspected the waste information that had been uploaded.</p>	Compliant

Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
	<ul style="list-style-type: none"> ■ Destination of the waste (for regulated wastes) ■ Intended fate of the waste, e.g. type of waste treatment, re-use, recycle, or disposal. 			
W33	Capture and report NGER data on a monthly basis using the JH Subcontract Energy, Water and Waste Report (JH-FRMENV-002-01).	Subcontractor - SEWWR inspected JHG - PPW	A completed Ditchfield SEWWR was inspected from September 2018. The only change is that it does not collect waste information as that is handled by JHG onsite. All data was in order. PPW holds the information for JHG.	Compliant
CBP1	Batch plants set up on hardstand to reduce dust.	Visual	The CBT has been constructed on compacted SMZ.	Compliant
CBP3	Monitoring of dust levels – monitoring points are set up at project boundaries to monitor dust. These are checked daily to ensure project activities are within licensed limits.	Visual inspection Dust MP	Inspected the two dust monitoring points around the site. Both appeared in order.	Compliant
CBP13	Any out of hours work will be completed under approval from the PER and subject to noise monitoring and verification.	OOHW permits for batch plant	Inspected the OOHW permits. The project also has negotiated noise agreements with the three closest residents. Noise monitoring results were inspected from the PPW and all appeared in order.	Compliant
CBP14	All plant and equipment to undergo a Plant Hazard Assessment (PHA's) prior to gaining access to the site.	Pre Acceptance Checklist (PAC) Plant Hazard Assessment (PHA) SS Irrigation - Volvo Excavator.	All plant and machinery arriving to site has to be checked under the PAC and PHA. PHA has noise assessment section that must be completed.	Compliant
CBP15	Plant and equipment is to be regularly inspected and maintained to ensure it is running optimally.	Pre Start Book	Pre Start Book directs operators to check the plant prior to undertaking works. These are completed by operators but no records are kept.	Compliant
CBP17	Weekly monitoring of noise levels at project boundaries to ensure operations are within licensed limits (58dBA).	PPW Noise Monitoring	Inspected PPW for noise monitoring records including time, date, location, noise levels - all records appeared in order.	Compliant
CBP22	Monitoring of water runoff as part of weekly and post rain environment inspections.	Weekly Environmental Inspection Report PPW has water quality data	Batch Plant stormwater runs into waste water treatment plant. It is monitored weekly against the inspection checklist. Reviewed inspection records.	Compliant
CBP24	All traffic on-site is limited to 20km/h. This helps control dust on internal roads and limits noise.	Traffic Management Plan - Driver Code of Conduct.	All vehicles are limited to <20km/h (Driver Code of Conduct); signage appears to reflect this.	Compliant



Approval (ID)	Requirement	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status
CBP25	Rumble grids at egress points to control tracking of material offsite onto public roads. Roadways to be cleaned where tracking is identified and excessive.	Site inspection	A rumble grid and wheel wash is at the exit to the site.	Compliant



Appendix C

Audit Team Curriculum Vitae



Appendix D

DPE Auditor Approval



Appendix E

Independent Audit Certification Form

Independent Audit Certification Form

Development Name	Eviron Road Quarry and Landfill Project – Stage 1
Development Consent No.	08_0068
Description of Development	<ul style="list-style-type: none">■ Construction of a new correctional centre■ Operation of a concrete batching plant.; and■ Construction infrastructure such as haul roads, compound sites, ESC, and other construction services, buildings and storage facilities as required.
Development Address	Avenue Road, Lavadia, NSW.
Operator	Clarence Valley Council
Operator Address	John Holland Pty Ltd Level 3, 65 Pirrama Road, Pymont NSW 2009

Independent Audit

Title of Audit	Independent Environmental Audit (MCoA B53)
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I certify that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- *The audit has been undertaken in accordance with relevant approval condition(s) and in accordance with the auditing standard AS/NZS ISO 19011:2014 and Post Approval Guidelines – Independent Audits*
- *The findings of the audit are reported truthfully, accurately and completely;*
- *I have exercised due diligence and professional judgement in conducting the audit;*
- *I have acted professionally, in an unbiased manner and did not allow undue influence to limit or over-ride objectivity in conducting the audit;*
- *I am not related to any owner or operator of the development as an employer, business partner, employee, sharing a common employer, having a contractual arrangement outside the audit, spouse, partner, sibling, parent, or child;*
- *I do not have any pecuniary interest in the audited development, including where there is a reasonable likelihood or expectation of financial gain or loss to me or to a person to whom I am closely related (i.e. immediate family);*
- *Neither I nor my employer have provided consultancy services for the audited development that were subject to this audit except as otherwise declared to the lead regulator prior to the audit; and*
- *I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from fair payment) from any owner or operator of the development, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.*

Note.

- a) *The Independent Audit is an 'environmental audit' for the purposes of section 122B(2) of the Environmental Planning and Assessment Act 1979. Section 122E provides that a person must not include false or misleading information (or provide information for inclusion in) an audit report produced to the Minister in connection with an environmental audit if the person knows that the information is false or misleading in a material respect. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000.*

The Crimes Act 1900 contains other offences relating to false and misleading information: section 192G (Intention to defraud by false or misleading statement—maximum penalty five years imprisonment); sections 307A, 307B and 307C (False or misleading applications/ information/ documents—maximum penalty two years imprisonment or \$22,000, or both).

Signature	
Name of Lead/ Principal Auditor	Simon Williams
Company	GeoLINK
Position	Director, Principal Environmental Auditor
Address	146 Beardy Street, Armidale
Email Address	swilliams@geolink.net.au
Date	9/4/2019



Appendix F

Photographs

