

18 September 2018

**Environmental Audit Program - Walsh Bay Arts Precinct, Pier 2/3 and Wharf 4/5, Hickson Road, Walsh Bay, NSW**

**1. Introduction**

JBS&G Australia Pty Ltd (JBS&G) has been engaged by Richard Crookes Construction Pty Ltd (RCC, the client) to undertake Environmental Compliance Auditing of the works being undertaken at the Walsh Bay Arts and Cultural Precinct located at Pier 2/3 and Wharf 4/5, Hickson Road, Walsh Bay, NSW (the site).

It is understood that, in accordance with the State Significant Development (SSD) development consent for the site, independent environmental audits are required to be completed in line with *AS/NZS ISO 19011-2014: Guidelines for Auditing Management Systems* and that the audits must be conducted by a suitably qualified, experienced and independent team of experts. It is additionally understood that an audit report is required which needs to: assess the environmental performance of the development and the effect on the surrounding environment; assess whether the development is complying with the terms of consent; review the adequacy of any documents; and recommend measures or actions to improve the environmental performance of the development.

A draft Construction Environmental Management Plan (CEMP) has subsequently been prepared by RCC that details the required procedures to be implemented during construction works to ensure the protection of the environment and the surrounding community. The CEMP further identifies that the following sub-plans are to be reviewed as part of the environmental auditing program:

- Community Communications Strategy;
- Construction Environmental Management Plan;
- Construction Noise and Vibration Management Plan;
- Construction Waste Management Plan;
- Hazardous Materials Management Plan;
- Construction Traffic and Pedestrian Management Plan; and
- Complaints and Enquiries Procedure and Management System.

This correspondence details the Environmental Audit program to be undertaken as part of the review of environmental procedures outlined in the CEMP to be implemented during construction works. It is noted that details of the Environmental Audit program could be subject to change, depending on amendments to the CEMP.

## 2. Audit Frequency

It is proposed to undertake a site inspection / audit of the site every 6 months to inspect RCC's environmental controls and ensure compliance with the site specific CEMP. Audits of documentation will be undertaken during the audit to determine if any updates/amendments of the CEMP are required and to ensure implementation of any additional CEMP requirements.

Within three months of commencing the Environmental Audit, or within another timeframe agreed by the Secretary, a copy of the audit report will be submitted (by RCC) to the Secretary, and any other NSW agency that requests it, together with a response to any recommendations contained in the audit report and a timetable for the implementation of the recommendations. The recommendations must be implemented by RCC to the satisfaction of the Secretary. '

## 3. Audit Compliance Checklist

A draft Audit compliance checklist has been provided in **Attachment 2**. The checklist is subject to change following finalisation of the CEMP.

## 4. Closing

Should you require clarification, please contact the undersigned on 02 8245 0300 or by email [cbielby@jbsg.com.au](mailto:cbielby@jbsg.com.au).

Yours sincerely:



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Attachments:

- (1) Limitations
- (2) Audit Compliance Checklist

## **Attachment 1– Limitations**

This report has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by JBS&G, and should not be relied upon by other parties, who should make their own enquires.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Ground conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.

## **Attachment 2 – Environmental Audit Checklist**

Ref. No.	Requirement (DA/EIS/other)	Reference	Compliance assessment	Comments/Observations/Supporting Documentation	Action (A) = address non-compliances Recommendations (R) = address observations
1	Is the development generally in accordance with the CEMP?				
2	Is the Environmental Policy displayed at the project/site office and induction sheds?				
<b>General Duty of Care</b>					
3	Is there any evidence on the site that RCC has taken all practicable measures to prevent or minimize harm to the environment?				
4	Are processes in place to ensure contractors and sub-contractors are aware of, and comply with, the conditions of consent and other relevant approvals?				
<b>Site induction and Education</b>					
5	Was evidence of site inductions, training of site personnel, notice boards, site inspections, prestart meetings, subcontractor meetings and team meetings identified?				
6	Have Site Induction Record Forms been completed?				
<b>Community Communications Strategy</b>					
7	Is a current Community Communications Strategy in place for the project?				
8	Are records of complaints and action taken maintained and reported to the Project Director, and if applicable, relevant authorities?				
9	Have complaints been addressed in a reasonable period?				
<b>Noise and Vibration</b>					
10	Is a current Noise and Vibration Management Plan in place for the project?				
11	Were works that generate high volumes of noise scheduled for a less sensitive time?				
12	Was all plant not in use throttled down or shut down when not in use?				
13	Are vehicles and mobile plant fitted with a non-tonal reversing alarm?				

Ref. No.	Requirement (DA/EIS/other)	Reference	Compliance assessment	Comments/Observations/Supporting Documentation	Action (A) = address non-compliances Recommendations (R) = address observations
14	Do records demonstrate the community has been informed in relation to noise intensive activities in the immediate area?				
15	Has Council approval been obtained for any construction activities outside EPA specified daytime construction hours?				
16	Has an investigation of any noise complaints been carried out and the complaint satisfactorily resolved?				
17	Has noise monitoring been undertaken in accordance with the noise and vibration management plan?				
18	Has there been any exceedances of the permissible noise levels as documented in the Plan? If so, is there evidence of appropriate mitigation measures been implemented?				
19	Are the works areas, vehicle and plant parking areas and equipment storage areas in locations where potential noise/vibrations impacts will be minimized?				
<b>Traffic and Access</b>					
20	Is a current Traffic Management Plan in place for the project?				
21	Do records demonstrate the surrounding land owner have been notified of the works?				
22	Are vehicles using designated access roads?				
23	Are all roads surrounding the access and egress from the site free of dust and mud?				
24	Are all vehicles transporting spoil on-site covered?				
25	Is there a dedicated vehicle wash down area?				

Ref. No.	Requirement (DA/EIS/other)	Reference	Compliance assessment	Comments/Observations/Supporting Documentation	Action (A) = address non-compliances Recommendations (R) = address observations
26	If applicable, has a dilapidation report been prepared for roads, kerbs, gutters and footpaths?				
Soil, Erosion and Water Quality					
27	Is construction in accordance with the Erosion and Sediment Control Plan?				
28	Are all erosion and sediment control devices properly installed and maintained?				
29	Is there evidence that newly exposed surfaces are stabilised as soon as possible?				
30	Are all fuels and hazardous liquids being stored in designated area?				
31	Are all chemicals being stored and used in accordance with the relevant MSDS?				
32	Is there an emergency spill kit on the site?				
33	Are all existing storm water pits and drains around the site silt protected with geo-fabric and/or granular socks?				
34	Are sediment fences installed at required locations around the perimeter of the site?				
Archaeology and Cultural Heritage					
35	Have any archaeological or culturally significant items been documented and reported to the relevant authority?				
Hazardous Materials and Site Contamination					
36	Has a Soil Contamination Assessment been undertaken on BIM 360?				
37	Has any contaminated/hazardous material been identified on site? If so, has it been tested by a suitably qualified environmental consultant?				
38	If a risk from contaminated material was identified, was the material				

Ref. No.	Requirement (DA/EIS/other)	Reference	Compliance assessment	Comments/Observations/Supporting Documentation	Action (A) = address non-compliances Recommendations (R) = address observations
	removed from site to an EPA approved landfill site (Subject to Client Approval)?				
<b>Waste Management</b>					
39	Was waste on site placed in correct bins provided?				
40	Are the waste collection points nominated on the site layout plan?				
41	Are the company's waste reduction objectives being achieved?				
42	Have records been maintained of transport of waste and delivery to a waste facility?				
<b>Environmental Complaints</b>					
43	Are records of complaints and action taken maintained and reported to the Site Manger and if relevant, appropriate authorities?				
44	Have complaints been addressed in a reasonable period?				
<b>Environmental Incidents and Emergencies</b>					
45	Have any environmental incidents or emergencies been investigated and preventative measures put in place to ensure they do not occur again? Additionally, have they been documented, reported to the relevant authority?				
<b>Environmental Monitoring</b>					
46	Have environmental site inspections been undertaken at a frequency listed in the Site Task Checklist? Were any non-conformances appropriately managed?				