

29 September 2023



ARTC REF# 6-0000-260-EEC-DE-LT-0009

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To Nick,

**CSSI 7474 Narrabri to North Star, Phase 1 (N2NS) Project
Independent Environmental Audit No 5 – Submission and Responses to Findings.
Minister's Condition of Approval A39**

I refer to the Ministers Conditions of Approval (**MCoA's**) issued for the Critical State Significant Infrastructure (**CSSI**) Project No 7474 Narrabri to North Star, Phase 1 on 13 August 2020 (**N2NS Planning Approval**), and specifically the requirement to submit Independent Audit Reports and the Proponents response to the audit findings to the Planning Secretary within 2 months of undertaking the audit in accordance with MCoA A39.

Following the fifth Independent Environmental Audit site inspection on 1 and 2 of August 2023, I am now pleased to be able to submit to you the fifth Independent Environmental Audit report for the N2NS Phase 1 project.

Please also refer to Attachment 1 – Response to Audit Findings which outlines the proposed actions and / or current compliance status against the suggested Opportunities for Improvement.

If you wish to discuss any of the above further, have any comments or concerns, please either contact Justin Bate, Health, Safety and Environment Superintendent on JBate@artc.com.au or 0438 952 286 or myself on PBorrelli@artc.com.au or 0407 254 363.

Yours sincerely

A handwritten signature in black ink, appearing to read "Peter Borrelli".

Peter Borrelli
ARTC Project Director N2NS
29 September 2023

Attachment 1 - Response to Audit Findings

Table 1 - Opportunities for Improvement

OFI Reference	Condition Reference	Context	Opportunity for Improvement	Action / Status
OFI01	C4	Duplication of document reference number for CNVMP and CBMP sub-plans.	Document numbers to be reviewed and updated to ensure they reflect unique identifiers for separate documents / sub plans.	The document numbering of the CNWMP has been a typographical error. The document is registered within ARTC's document control system as 5-0018-260-PES-00-PL-0004. It is noted correctly in the footer of the document. The error shall be amended in the next revision of the document.
OFI02	E64	<p>The Proponent must consult with all landowners whose visual amenity from their residence is identified as highly impacted by the CSSI (as per Table 5 of Technical Report 10 in the EIS) to determine the mitigation measures that will be implemented to maintain visual amenity. The Proponent must come to an agreement with the landowner on the mitigation measures and implement the measures prior to the operation of the CSSI.</p> <p>This Environmental Design Requirement was considered in the SP1 IFC Detailed Design Report prepared by WSP/Mott McDonald dated May 2019. To be further reviewed as construction nears completion.</p>	Recommended that an updated review of the SP1 IFC Detailed Design Report be prepared in accordance with previous audit recommendations as construction is nearing completion.	<p>Condition E64 is not currently triggered. Review has been undertaken of the identified highly impacted locations detailed as per Table 5 of Technical Report 10 in the EIS.</p> <p>Four places were identified as highly impacted. Three of these locations have been deferred from the current scope of construction works for N2NS SP1 (Newell Highway Overbridge, Jones Street Overbridge and Camurra Bypass) and no visual impact has occurred. At the fourth location for potential visual impact of the Bobbiwaa crossing loop from the Newell Highway, there is no residence located. Therefore, no consultation has occurred due to either no construction and hence no visual impacts occurring at the locations or no residence to consult.</p> <p>Construction of these deferred works will occur at a later date and further review as per this requirement shall be undertaken as part of those construction activities at that time.</p>

OFI03	Section 4.4.1	<p>It was observed that some areas in Stage 1 and 2 where seeding and landscaping works had occurred required further attention due to prevalent dry conditions over the months leading into the audit. While these areas have satisfied the requirement to undertake seeding and landscaping works, dry conditions have inhibited seed strike, and consequently these areas require some rework or management to establish cover.</p>	<p>A) It is recommended that where landscaping works are undertaken, this is accompanied by short term management, such as watering and weed control, dependent on environmental conditions to ensure effective strike and cover is attained.</p> <p>B) The effectiveness of landscaping works should be reviewed and considered by the environment team prior to handover from construction to operations to ensure that landscaping has achieved a sustainable outcome</p>	<p>ARTC are currently implementing landscaping and rehabilitation reviews and undertaking a series of measures targeting landscaping, rehabilitation and weed management along the alignment.</p> <p>This process encompasses weed management including determining if treatment has been effective, landscaping assessments, including seed strike and vegetation cover assessments to determine if stipulated landscaping performance requirements as detailed within the Contractor's CEMP and Contractual requirements have been met. Continual monitoring is undertaken by environmental teams that include Project and ARTC Operational representatives.</p> <p>This review process includes confirmation by ARTC and ARTC Operations for acceptance of areas and any rework required as part of defect and maintenance activities of completed areas of the alignment is agreed and documented for rectification.</p> <p>The construction Contractor holds an Environment Protection Licence (EPL) for the project and will be consulting with the Environment Protection Authority (EPA) to determine the appropriate timing for the relinquishment of their EPL following the establishment of 70% ground cover across 90% of the site area and an assessment of the long-term stability non-eroding / non-polluting nature of the formation.</p> <p>A plan for completion of defect rectification is in progress.</p>
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OFI04	Section 4.4.1	Weed management is being undertaken across the project, given prevailing weather conditions, and the landscaping issues noted above, there are areas where a more focused approach to weed management is recommended. Some operational areas such as Bobbiwaa Creek, Croppa Creek, Boggy Creek and Gurley Creek sites showed particularly aggressive weed growth.	It is recommended that a strategic approach to weed management is considered and undertaken. This may consist of mechanical removal of weeds and/or upper soil layers to reduce the potential weed seed bank, improved preparation of surface/soils prior to works to promote growth of targeted species along with regular control through slashing, spot spraying or more widespread application of herbicides dependent on weed type.	As per response for OFI03. Practical weed management application or retreatment is in progress as part of landscaping and rehabilitation activities.
OFI05	Section 4.4.2	Some operational areas were observed with rilling and gulying in drainage lines as a result of the failure of vegetation cover in these areas. While conditions have been dry, and downstream controls (such as rock armouring or vegetated swales and drains) have mitigated any potential water pollution issues, it is recommended that rectification and maintenance of these areas is undertaken to ensure that sediment and erosion impacts are mitigated.	Review and undertake rectification and maintenance of erosion in operational areas to ensure that sediment and erosion impacts are mitigated.	Defect identification and rectification processes are underway along the alignment. Maintenance or rectification agreements of erosion is documented and shall be rectified where issues have been identified and as agreed by all stakeholders.