



Compliance Tracking Report July-December 2013

Googong Township Integrated Water Cycle Project

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Contents

- 1.0 INTRODUCTION..... 5**
 - 1.1 Background..... 5
 - 1.2 Purpose..... 5
- 2.0 SCOPE OF WORKS..... 7**
 - 2.1 Stage A Network (west)..... 7
 - 2.2 Stage A Network (east)..... 7
 - 2.3 Stage A Network (pre-operation)..... 7
 - 2.4 Stage AB Water Recycling Plant (pre-construction)..... 7
 - 2.5 Consistency assessments..... 8
 - 2.6 Modifications..... 8
- 3.0 ENVIRONMENTAL CONTROLS..... 9**
 - 3.1 Introduction..... 9
 - 3.2 Stage A Network (west)..... 9
 - 3.3 Stage A Network (east)..... 9
 - 3.4 Other..... 9
- 4.0 COMPLIANCE WITH CONDITIONS..... 10**
 - 4.1 Compliance tracking..... 10
 - 4.2 Summary of non compliances..... 10
- 5.0 ENVIRONMENTAL INCIDENTS..... 11**
 - 5.1 Category 1 incidents..... 11
 - 5.1.1 Failure of erosion and sedimentation controls..... 11
 - 5.1.2 Removal of heritage fencing..... 12
 - 5.2 Category 2 incidents..... 13
 - 5.2.1 Failure of erosion and sedimentation controls..... 13
 - 5.3 Other..... 13
- 6.0 MONITORING..... 14**
 - 6.1 Introduction..... 14
 - 6.2 Stage A Network (west)..... 14
 - 6.2.1 Water quality monitoring..... 14
 - 6.3 Stage A Network (east)..... 14
 - 6.3.1 Water quality monitoring..... 14
 - 6.4 Nest boxes..... 14
 - 6.5 Surface water, aquatic ecology and groundwater..... 14
 - 6.6 Meteorological conditions..... 15
- 7.0 INSPECTIONS AND AUDITS..... 16**
 - 7.1 Inspections..... 16

7.1.1	Stage A Network (west)	16
7.1.2	Stage A Network (east)	17
7.1.3	Other	18
7.2	Audits	18
8.0	ENVIRONMENTAL COMPLAINTS	20
8.1	Stage A – Network (west)	20
8.2	Stage A – Network (east)	20
8.2.1	Sediment-laden runoff	20
8.3	Other	20
9.0	CONCLUSION	21

Tables

Table 1	Non-compliances identified during July to December 2013	10
Table 2	Findings and follow up actions from independent audit	19

Appendices

Appendix 1	Compliance Tracking Register	22
Appendix 2	EPA Caution	23

1.0 Introduction

1.1 Background

Googong Township Proprietary Limited (GTPL), a partnership between Canberra Investment Corporation (CIC) and Mirvac, is responsible for the development of the new Googong Township that will be located in the Canberra region, around 7 km south of Queanbeyan in NSW. The new Googong Township will be home to about 16,000 people and developed over the next 25 years.

The township is designed around an Integrated Water Cycle (IWC), with a dedicated Water Recycling Plant (WRP) that will reduce the consumption of potable water in the community by around 60 per cent and recycle the township's water for non-potable use.

The *Googong Township Water Cycle Project Environmental Assessment* (November 2010) (EA) was prepared under (the now repealed) Part 3A of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) to assess the impacts of construction and operation of infrastructure for the potable water, recycled water and sewage system required to service the township.

Concept Approval for the ultimate development (Stage 1 and Stage 2) and a Project Approval for Stage 1 of the Googong Township IWC Project (IWC Project) were granted by the NSW Planning Assessment Commission, under delegation from the Minister for Planning and Infrastructure on 24 November 2011.

The IWC Project is being constructed and operated in stages to ensure the infrastructure is correctly sized to meet the incremental level of demand. Construction for Stage 1 commenced in January 2013.

Stage 1 of the IWC Project comprises new infrastructure to deliver potable drinking water to the township, treat wastewater and utilise recycled water for re-use in the township and for environmental discharge. Stage 1 includes a new WRP, temporary reservoirs for recycled and potable water, pumping stations and mains pipework (including rising and distribution mains) for sewage, recycled water and potable water.

The Compliance Tracking Program for the IWC Project, approved by the Department of Planning and Infrastructure (DP&I) in October 2012, stipulates that a Compliance Tracking Report must be prepared every six months during the construction period of the IWC Project. An Environmental Representative (ER) has also been appointed for the IWC Project (Richard Sharp, NGH Environmental) who oversees the implementation of all environmental management plans and monitoring programs and advises on compliance obligations.

1.2 Purpose

Pre-construction compliance reports for the first two construction stages were prepared in late 2012 and the first construction compliance report was prepared for the period extending from January to June 2013. This Compliance Tracking Report has been prepared to assess compliance of the IWC Project for the reporting period of July 2013 to December 2013.

As noted in Section 1.1, Stage 1 of the IWC Project is being constructed in stages to meet the incremental demand and this report assesses the compliance for stages that were underway or soon to commence during the reporting period (July to December 2013), and includes:

- Stage A Network (west) (construction phase).
- Stage A Network (east) (construction phase).

- Stage A Network (pre-operation).
- Stage AB Water Recycling Plant (pre-construction).

This Compliance Tracking Report has been structured so that each chapter addresses one of the issues, as required by Section 2.2 of the Compliance Tracking Program.

- Scope of activities – Section 2.0.
- Performance of environmental controls – Section 3.0.
- Compliance with conditions and summary of non-compliances – Section 4.0.
- Environmental incidents – Section 5.0.
- Outcomes of monitoring – Section 6.0.
- Outcomes of inspections and audits – Section 7.0.
- Complaints – Section 8.0.

2.0 Scope of works

2.1 Stage A Network (west)

Stage A – Network (west) comprises a Sewage Pumping Station (SPS), interim reservoirs and connecting pipe mains and is currently being constructed by GTPL and their contractor Woden Contractors. A Construction Environmental Management Plan (CEMP) was prepared by GTPL and approved by DP&I on 18 October 2012, with subsequent minor revisions endorsed by the ER. Construction commenced on Stage A – Network (west) in January 2013.

During the reporting period (July to December 2013), Woden Contractors has undertaken the following construction activities as part of the Stage A – Network (west):

- SPS – backfilling; installation and fit out of wet well units; vent pipe works; construction of parking bay; testing and commissioning works.
- Interim reservoirs – excavation works; pit construction; installation of tanks and pipework; filling and testing of the reservoirs; and commissioning works.
- Pipelines – pressure testing; works at the interim reservoirs site; swabbing; and super chlorination.

2.2 Stage A Network (east)

Stage A – Network (east) comprises the Bulk Water Pumping Station (BWPS) and associated water pipes to Stage A – Network (west) and is currently being constructed by Guideline ACT, under the supervision of ACTEW on behalf of GTPL. A CEMP was prepared by GTPL and approved by DP&I on 5 December 2012, with subsequent minor revisions endorsed by the ER. Construction commenced on Stage A – Network (east) in May 2013.

During the reporting period (July to December 2013), Guideline ACT has undertaken the following construction activities as part of the Stage A – Network (east):

- BWPS – mechanical pipe installation; floor slab and Motor Control Centre (MCC) roof construction; building certification; block work; and temporary commissioning works.
- Pipelines – earthworks (including batters, cut to fill pipe bench and access track) and pavement works.
- Water mains – scour valve and air valve installation; and pressure testing.
- Electrical – high voltage and switchboard works.

2.3 Stage A Network (pre-operation)

The pre-operation status was considered as part of the Compliance Tracking Report (January-June 2013) with the intention of commencing operations later in 2013. However due to some delays in construction and commissioning, the start date for operations commenced in January 2014. As such, the pre-operation phase for Stage A Network has been considered for this compliance review. Operation of Stage A Network will be considered as part of the next compliance review.

2.4 Stage AB Water Recycling Plant (pre-construction)

The next stage of the IWC Project to commence construction is the Stage AB Water Recycling Plant, which involves infrastructure to provide tertiary treatment of sewage and production of recycled water suitable for use within the township. The Water Recycling Plant is situated in the north-eastern corner of NH1A adjacent to Googong Dam Road.

A CEMP was prepared by GTPL and approved by DP&I on 11 December 2013. Construction works are scheduled to commence in April/May 2014. As such the pre-construction status has been considered for the Stage AB Water Recycling Plant for the July to December 2013 reporting period.

2.5 Consistency assessments

One consistency assessment was prepared during the reporting period and issued to the ER and to DP&I. It was for the use of a storage dam during commissioning, which was not originally described as part of the EA, Submissions Report or CEMP for Stage A – Network. As a result of the consistency, some additional controls were included into the Soil and Water Management Plan (appended to the CEMP).

2.6 Modifications

No modifications to the Part 3A concept or project approval were sought by GTPL or issued by DP&I during the reporting period.

3.0 Environmental controls

3.1 Introduction

Environmental controls are implemented in a manner that avoids or minimises the impact to the environment and the community. These controls can be short term (during construction) or long term (during operation). The following section outlines environmental controls that have been installed and implemented as part construction of the IWC Project during the reporting period.

3.2 Stage A Network (west)

As per the mitigation measures prescribed in the environmental management plans appended to the CEMP, the following environmental controls at Stage A – Network (west) remained in place during the reporting period:

- Installation and maintenance of erosion and sediment controls as outlined in the Erosion and Sediment Control Plan, and water testing (turbidity) after rainfall events.
- Appropriate storage of chemicals and spill kits.
- Ten nest boxes installed in January 2013.
- No noise/vibration monitoring was required during the reporting period (no blasting was undertaken).

3.3 Stage A Network (east)

As per the mitigation measures prescribed in the environmental management plans appended to the CEMP, the following environmental controls at Stage A – Network (east) remained in place during the reporting period:

- Installation and maintenance of erosion and sediment controls as outlined in the Erosion and Sediment Control Plan, and water testing (turbidity) after rainfall events.
- Appropriate storage of chemicals and spill kits.
- Installation of remaining 10 of the required 46 nest boxes.
- Fencing of clearing exclusion zones (eg for Endangered Ecological Communities, Hoary Sunray population).
- Heritage fencing around known heritage items.
- Dust suppression through use of water tanker.
- No noise/vibration monitoring was required during the reporting period (no blasting).

3.4 Other

No environmental controls were installed as part of the operation of Stage A Network or construction of Stage AB Water Recycling Plant, as these stages did not commence during the reporting period.

4.0 Compliance with conditions

4.1 Compliance tracking

Appendix A includes a Compliance Register that assesses compliance for each of the applicable stages of works under or about to commence for the period from July to December 2013. The Compliance Register was populated by undertaking a review of audits, incident and monthly reports, complaints database, project website and discussions with GTPL personnel and their contractors.

4.2 Summary of non-compliances

There were two non-compliances identified in the compliance review, which are summarised in Table 1. The non-compliances related to sediment-laden water leaving construction site and notification letters for blasting. The follow up actions to these non-compliances are addressed in Section 9.0.

Table 1 Non-compliances identified during July to December 2013

No	Condition	Comment
B2	Except as may be expressly provided by an Environment Protection Licence for the project, the Proponent shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	<p>EPL 20188 and Section 120 of the POEO Act do not allow for any discharges to the environment. On 19 July 2013, erosion and sedimentation controls were overwhelmed and sediment-laden water was observed to be leaving the site at the Stage A – Network (west/east) construction sites. Refer Section 5.0 for more information.</p> <p>The pollution incident was reported to DP&I and the EPA but not immediately. Follow up information including a root cause analysis outlining the follow up actions was provided shortly after.</p> <p>The EPA issued a caution in relation to the July event (2 December 2013), which noted that the incident had the <i>potential</i> to cause harm and that it had not been reported immediately as required by the POEO Act (refer Appendix 2).</p> <p>The erosion and sedimentation were re-established by the contractors immediately and the importance of maintaining controls (ie inspecting every week and before/after rainfall events) has been tool-boxed. The ER also regularly provides advice on controls and approves each revision of the Erosion and Sedimentation Control Plans.</p> <p>With regards to notification procedures an Environmental Incident Reporting Flowchart was prepared by GTPL and issued to contractors to more clearly explain notification and reporting responsibilities.</p> <p>More detail on the requirement to report incidents and the Environmental Incident Reporting Flowchart have also been included in the CEMP for Stage AB WRP.</p>
C13	At least two weeks prior to commencing blasting activities, the Proponent shall notify Council and potentially affected landowners, including details of time, location and frequency of the blasting and providing a contact point for inquiries and complaints.	<p>The independent audit for Stage A – Network (east) held 19 November 2013 identified that blasting notifications in June 2013 were issued one day prior to blasting, not two weeks as required by the condition.</p> <p>No blasting has been undertaken for the IWC Project since this was issue was identified, however the Noise and Vibration Management for the Stage AB WRP has been updated to include more specific requirements around notification letters (including a GTPL review prior to issuing). The Monthly Environmental Report template has also been amended to include sections for the contractor to advise of upcoming works that may require notification, and then a second section to confirm dates and details of any notifications sent. This will allow GTPL to better track and ensure notification letters are being sent within the appropriate time frames.</p>

5.0 Environmental incidents

5.1 Category I incidents

There were two Category 1 incidents recoded during the reporting period.

5.1.1 Failure of erosion and sedimentation controls

Failure of controls

On 19 July 2013 the ER observed several instances where sediment-laden water was not being contained by the sediment controls during his inspections of Stage A – Network (west) and Stage A – Network (east). Sediment controls were not adequate or in place to prevent sediment laden water from escaping offsite during and after the significant rainfall event experienced at the time.

The findings of the inspection were documented in the inspection reports for both sites and included six recommendations for Stage A – Network (west) and seven recommendations for Stage A – Network (east). This included raising three particular events as a Category 1 incident for Stage A – Network (west) and five events as a Category 1 incident for Stage A – Network (east). Although in this instance there was no material harm to the community or environment, the incident posed a potential threat and so was classified as a Category 1 incident.

The ER provided a copy of the inspection reports to GTPL and DP&I on 22 July 2013. In addition GTPL provided DP&I with formal notification of the incident on 24 July 2013.

Follow up actions

Recommendations made by the ER to rectify controls were implemented immediately by the contractors for Stage A – Network (west) and Stage A – Network (east). This involved installing additional sediment control (eg straw bale filters), and the two Erosion and Sedimentation Control Plans are being updated to reflect the additional controls.

Both contractors were instructed to conduct toolbox talks on the incident and were reminded to carry out regular inspections of sediment and erosion controls to ensure that they are correctly installed and maintained. In particular, before and after any forecasted heavy rainfall events. A Root Cause Analysis was prepared that provided details of the follow up actions and was provided to DP&I on 1 August 2013.

EPA involvement

The NSW Environment Protection Authority (EPA) was advised of the Category 1 incident by Guideline for Stage A – Network (east) on 25 July 2013. GTPL then provided formal notification to the EPA for both Stage A Network – (west) and Stage A – Network (east) incidents on 26 July 2013.

GTPL received an Official Caution from the EPA on 2 December 2013 for the failure to notify a pollution incident on 19 July 2013 in accordance with Section 148 of the *Protection of the Environment Operations Act 1997* (POEO Act), and for failing to comply with Section 120 of the POEO Act – pollution of waters (refer Appendix 2).

In response to the caution, it was noted that the erosion and sedimentation controls had already been rectified and that the contractors were actively managing the controls in liaison with the ER. With regards to the failure to notify, it was noted that the legal obligation to notify of a pollution incident falls with the person

carrying out the activity, employee, employer and occupiers of a premise. As a result of this shared responsibility among contractors and GTPL, there was a lack of clarity in the CEMP as to which person/organisation is required to report a Category 1 pollution incident to the EPA.

As only one notification needs to be issued, it is now considered appropriate that GTPL, as the licence holder of EPL 20188, will be the main point of contact with the EPA and other regulators. Following on from this incident, contractors have been requested to immediately report all incidents to GTPL, after which GTPL will immediately notify (via phone and in writing). This has also been outlined, along with relevant contact details, in an Environmental Incident Reporting Flowchart prepared by GTPL and issued to the contractors. Clearer information on reporting procedures and in the Environmental Incident Reporting Flowchart has been included in the Stage AB Water Recycling Plant CEMP.

5.1.2 Removal of heritage fencing

Removal of fencing

On Friday 28 June, GTPL determined that the protective fencing around Aboriginal heritage site GWTP7 had been removed during recent construction works for Stage A – Network (east). A spoil stockpile had been placed in the area that was identified as site GWTP7 (AHIMS # 57-2-0775). The incident was formerly recorded on 1 July 3013, and reported to the ER, DP&I and OEH on 2 July 2013.

It is important to note that no Aboriginal heritage items were damaged as a result of the removal of the protective fencing as the precise location of the GWTP7 artefact was no longer known. This has been determined during an inspection of the site by heritage consultants (Navin Officer) prior to works commencing. However it was still classified as a Category 1 incident as an environmental control (ie fencing of a heritage site) prescribed in the Heritage Management Plan (HMP) was removed without approval.

Follow up actions

The heritage fencing around GWTP7 was reinstated and has remained in place during the reporting period. GTPL prepared a Root Cause Analysis to issue to the contractors and ACTEW to provide information on the:

- Need to adhere to the CEMP and implement the prescribed environmental controls, unless such plans are amended and approved.
- Appropriate processes to amend CEMPs and remove environmental controls.
- Review procedures for the CEMP and a summary of what kind of events or activities trigger a review of the CEMP.

The Root Cause Analysis was also provided to DP&I for information.

The HMP for Stage A – Network (east) has been amended to include an appendix relating to GWTP7 site and changes to some mitigation measures to make clear that fencing can only be removed once approved. The ER has endorsed these amendments.

Since the incident, GTPL has sought advice from Navin Officer around the practicalities of fencing a site when the precise location of an artefact is not known. Navin Officer, on behalf of GTPL recently lodged an Aboriginal Site Impact Recording (ASIR) form, to provide additional information to the AHIMS recording in that the exact location of the GWTP7 is not known but exists in the general vicinity. Once the ASIR is uploaded to the database by OEH, then GTPL and Guideline will amend the HMP for sign-off by the ER and the fence can be removed. If this does not occur prior to the completion of construction, the fence will be removed in any case as part of the demobilisation of the construction site.

5.2 Category 2 incidents

There was one Category 2 incident recorded during the reporting period.

5.2.1 Failure of erosion and sedimentation controls

Failure of controls

On 18 September 2013 there was heavy rainfall event and the subsequent failure of some erosion and sedimentation controls at the Stage A – Network (west/east) sites was observed by the contractors and raised as a Category 2 incident. The site was also the subject of an EPA inspection on 19 September 2013. The EPA observed that some controls needed to be repaired but that the controls held up relatively well and that sediment-laden water had been contained on site.

Both contractors prepared reports including details of the incidents and liaised with the ER over remedial actions. The areas of concern identified included:

- Stage A – Network (west):
 - » Discoloured water running over the top of the sediment control fencing at Reservoir access road.
 - » Discoloured water running down the overflow of the farms dam adjacent the Wodens compound.
- Stage A – Network (east):
 - » Clean up Gully point at CH 500 opposite Blakely's woodland where sediment had broken through the first line of silt fence protection.
 - » Install additional controls (straw bale filters) on the downslope side of sections of the sediment fence around CH 740 and at the headwall where it meets the link road.

The EPA raised the following concerns:

- A few sediment fences and hay bales alongside Googong Dam Road were full of sediment and need to be maintained and/or reinstated (Stage A – Network (east)).
- The entrance area to the site needs to be stabilised with a better rubble/aggregate surface to minimise sediment mobilisation and tracking from vehicles accessing the site (outside IWC Project area but undertaken by one of the subdivision contractors).
- Soil/rock stockpile in paddock without controls installed (outside IWC Project area but undertaken by one of the subdivision contractors).

Follow up actions

Both contractors promptly repaired fencing and installed additional controls for the areas listed above. One additional straw bale recommendation was made for Stage A – Network (east) in the next ER's inspection report. No other clean up actions were identified (NGH Environmental inspection report, 27 September 2013).

5.3 Other

No incidents were reported for the operation of Stage A Network or construction of Stage AB Water Recycling Plant, as these stages had not commenced during the reporting period.

6.0 Monitoring

6.1 Introduction

Environmental monitoring is undertaken to measure the effectiveness of environmental controls and the implementation of management plans, and to address approval requirements. Environmental monitoring undertaken for Stage A – Network (west) and Stage A – Network (east) during the reporting period are outlined in this section, along with information on the baseline monitoring required for the IWC Project prior to the operation of the Water Recycling Plant. No operational monitoring was required during the reporting period (eg tanker movements) as operations had not yet commenced.

6.2 Stage A Network (west)

6.2.1 Water quality monitoring

Water monitoring (turbidity) was undertaken three times in August and September 2013 at a dam adjacent to the site office. The measurement taken on 16 August 2013 exceeded the discharge water quality criteria outlined in the Soil and Water Management Plan (50 NTU) and was subsequently dosed to reduce turbidity levels to within guideline levels. The ER then measured turbidity levels below 50 NTU on the next two occasions (30 August and 27 September 2013) and no further action was recommended.

6.3 Stage A Network (east)

6.3.1 Water quality monitoring

Water monitoring (turbidity) was undertaken in July 2013 at a large gully site located next to chainage 660 following a rainfall event. Guideline ACT recorded in their monthly report that normal levels of turbidity were observed.

6.4 Nest boxes

A total of 56 nest boxes have been installed for Stage A – Network and, while monitoring of the nest boxes is not a requirement, Biosis conducted an inspection of the boxes on 5 December 2013. It was noted that there was a high utilisation of the nest boxes (by species including the Brush-tailed Possum, Sugar Glider, Owllet Nightjar, Eastern Rosella and Crimson Rosella). And while threatened fauna may not currently occupy the boxes, they are considered to be of value to a few of the common native fauna species that lost nesting/roosting resources during clearance required for the construction of the IWC Project.

6.5 Surface water, aquatic ecology and groundwater

A draft Water Management Plan (CoA D8) has been prepared in consultation with agencies, councils and the Bush on Boundary community group. It outlines the approach and methodology for the Surface Water and Aquatic Ecology Monitoring Program (Appendix A) and Groundwater Monitoring Program (Appendix B). CoA D8 and SoC WQ4 requires that at least of year of baseline monitoring must be undertaken prior to the discharge of recycled water. Once this baseline data is obtained, trigger levels for the IWC Project and other operational detail will be included in the Water Management Plan it will be submitted to the Director-General for approval.

Baseline monitoring commenced for both programs in September 2013. This also required obtaining a Groundwater Licence (under the *Water Act 1912*) prior to installing the groundwater bores. Approval from the NSW Office of Water was provided on 5 August 2013 for this activity.

SMEC has been engaged by GTPL to install and monitor the bores during the baseline period. A number of shallow and deep bores were installed at seven sites across the township as per the draft Water Management Plan. Quarterly testing of ground water levels and quality is underway.

Sentinel has been engaged to undertake the surface water and aquatic ecology monitoring at nine sites along Googong Creek, Montgomery Creek and Queanbeyan River which involves monthly sampling of a range of water quality parameters and diatoms with quarterly sampling of macrophytes, fish and habitat.

An application to install two water-monitoring stations along the Queanbeyan River was also submitted during the reporting period to the NSW Office of Water to request a Controlled Activity Approval (under the *Water Management Act 2000*). The monitoring stations are due to be installed in early 2014.

6.6 Meteorological conditions

Odour dispersion modelling was undertaken for the IWC Project during the environmental assessment phase. Statement of Commitment AQ1 requires that the modelling be updated with consideration of site-specific meteorological data, collected at the WRP site for at least 12 months prior to commissioning.

A weather station was installed near the Water Recycling Plant site in June 2013 and has been recording meteorological data since 22 July 2013. The weather station is managed by Sentinel on behalf of GTPL.

7.0 Inspections and audits

7.1 Inspections

7.1.1 Stage A Network (west)

7.1.1.1 Weekly inspections

The OH&S Representative from Woden Contractors has undertaken weekly site inspections that cover the broader Stage A – Network (west) activities but also includes environmental aspects.

7.1.1.2 Environmental Representative inspections

The ER continued to conduct fortnightly inspections of Stage A – Network (west) throughout the reporting period. The ER prepared reports that outline observations and recommendations for Woden Contractors to implement, and also reviewed and approved Erosion and Sedimentation Control Plans.

During the reporting period, the ER made a number of recommendations:

- Improve sediment fencing upslope of the farm dam adjacent to the site office.
- Install the following erosion and sediment controls:
 - » sediment fencing around specified stockpiled trenching material.
 - » clean water diversion pipe under the access track leading to the interim reservoir.
 - » straw bale filters at specified locations (Category 1 incident).
- Extend and repair the sediment fence alongside the proposed access road to the interim reservoir (Category 1 incident).
- Treat the farm dam which received sediment laden water that passed through nearby sediment fences until turbidity less than 50 mg/L (Category 1 incident).
- Extend the sediment fencing around a temporary stockpile located at the SPS.
- Install temporary fencing around an open trench to prevent fauna from falling into it.
- Modify and regularly update the Waste Removal Register.
- Update the Erosion and Sediment Control Plan.
- Establish a register of environmental incidents, to be kept onsite.
- Submit monthly environmental reports to the ER in a timely manner.
- Obtain written evidence from ACTQ Septic Services that sewage is sent to the local sewage treatment plant, and that ACTQ is authorised to transport this type of liquid waste in NSW.
- GTPL were advised to:
 - » ensure installed sediment fencing by external contractor is repaired.
 - » inform Queanbeyan City Council (QCC) about illegally dumped building waste located onsite.
 - » instruct external contractors to re-instate sediment fencing around specified locations.
 - » instruct communication cable installation contractor to remove all spilt concrete.
 - » ensure external contractors do not establish stockpiles onsite without first installing erosion and sediment control measures.

- » ensure that the portable chlorine and dosage instrumentation storage container located at the interim reservoir site has a capacity of 110% of the volume of the chlorine solution stored within the container.
- » ensure that no construction materials or wastes from external contractors are stored or deposited under the drip lines of trees.
- » ensure that external contractors are aware of the risks of temporarily storing straw bales alongside flowering noxious weeds.

In summary, there were three Category 1 incidents relating to erosion and sedimentation controls that were raised by the ER at the 20 July 2013 inspection. These were considered to be one event, and were investigated as outlined in Section 5.1. Measures to improve sediment controls on the site have been implemented by the contractor.

A review of the documentation has indicated, that aside from the Category 1 incidents, most of the ER's observations and actions during the reporting period were of a minor nature and have been appropriately addressed by GTPL and the contractor.

7.1.2 Stage A Network (east)

7.1.2.1 Weekly inspections

Guideline ACT staff conducted weekly inspections of Stage A – Network (east) throughout the reporting period. A check sheet was used, and identified issues/actions were followed up. The findings of the inspections were discussed in team meetings and toolbox talks.

7.1.2.2 Environmental Representative inspections

The ER continued to conduct fortnightly inspections of Stage A – Network (east) throughout the reporting period. The ER prepared reports that outline observations and recommendations for Guideline ACT to implement, and also reviewed and approved Erosion and Sedimentation Control Plans.

During the reporting period, the ER made a number of recommendations.

- Install the following erosion and sediment controls:
 - » straw bale filters behind the sediment fence where it is evident that sediment is passing beneath the fence.
 - » low flow earth bank across a bush track that dissects the pipeline corridor.
 - » straw bale filters along the Googong Road table drain as it is receiving sediment laden water running off from completed pipeline works (Category 1 incident).
 - » straw bales at the drop inlets located near the pump station and at the intersection of the Googong Road and Treatment Plant Road (Category 1 incident).
 - » earth bunds at specified locations.
 - » additional controls on the downslope side of sections of the sediment fence where the fence cannot be trenched (Category 1 incident).
 - » temporary sediment loss control above the headwall of a culvert near the BWPS.
 - » appropriate controls along the old access track and the re-constructed access track located upslope of the BWPS, as well as at the lowest point within the BWPS site.
- Divert stormwater coming onto site from the ACTEW Treatment Plant to prevent soil erosion and sediment loss (Category 1 incident).

- Extend the length of existing straw bale filters and sediment fencing at specified locations.
- Remove excess sediment build-up from straw bale filters along the Googong Road table drain.
- Realign some of the straw bale filters installed on the northern side of Googong Road.
- Dispose of any 'green waste' onsite and avoid stockpiling such material beneath the driplines of any native trees.
- Ensure that drip trays used to collect oils are not left outside in the open.
- Store substances such as engine oil in bunded or contained areas.
- Reuse or recycle waste concrete.
- Ensure temporary fencing panels are not placed up against native vegetation.
- Remind staff during a toolbox talk of the requirement to place waste or recyclable materials into dedicated bins or specific areas for collection.
- Obtain written evidence from ACTQ Septic Services that sewage is sent to the local sewage treatment plant, and that ACTQ is authorised to transport this type of liquid waste in NSW.
- Modify and/or update the onsite plant inspection checklist and Waste Removal Register.
- Revise and/or update the Erosion and Sediment Control Plan and the Traffic Control Plans.

In summary, there were five Category 1 incidents relating to erosion and sedimentation controls that were raised by the ER at the 20 July 2013 inspection. These were considered to be classified as one event, and were investigated as outlined in Section 5.1. Measures to improve sediment controls on the site have been implemented by Guideline ACT.

A review of the documentation has indicated, that aside from the Category 1 incidents, most of the ER's observations and actions during the reporting period were of a minor nature and have been appropriately addressed by GTPL and the contractor.

7.1.3 Other

No inspections were required for the operation of Stage A Network or construction of Stage AB Water Recycling Plant, as these stages had not commenced during the reporting period.

7.2 Audits

NGH Environmental conducted an independent environmental audit of the IWC Project on 19 November 2013. It involved an opening meeting, site visit and inspection of Stage A – Network (east), review of contractor's documentation, preliminary close-out meeting, review of GTPL documentation and final close. A copy of the audit report was provided to DP&I and the ER on 6 December 2013.

There were no Corrective Action Requests identified during the audit, however a number of Observations of Concerns were identified and which have been actioned (refer Table 2).

Table 2 Findings and follow up actions from independent audit

No.	Details	Follow up action
1	GTPL CEMP has not been updated since last audit.	This was the first time the Network East CEMP had been audited and is different (although similar) to the Network West CEMP. None of the findings of the Network West audit required changes to the Network East CEMP. No action required.
2	Potential for long term erosion at the 2 nd rock batter. Also some sediment fence maintenance required along the pipeline route.	<p><u>Second rock batter</u></p> <p>The rip rap has been rearranged to reduce potential for long term erosion. The gradient of the road has been checked to ensure road runoff is directed into the rock drain on the opposite side of the road. There are straw bales positioned downstream of the sediment fences in case sediment escapes the other erosion protection measures.</p> <p><u>Sediment fences</u></p> <p>Sediment fences have been inspected for damage. Sediment has been cleaned from sediment fences where there is the potential for water to escape.</p> <p>Where the batter has been hydro-mulched along the access road, Guideline ACT intends to leave the sediment fences in place until the expiry of the defect rectification period.</p>
3	Notification letters were sent to residents the day before the blast (letter dated 06/06/2013). As required by CoA C13, residence and council need to be notified two (2) weeks prior to blasting.	<p>There is no more blasting scheduled for Stage A Network (East) however blasting will take place as part of the next construction stage (Stage AB Water Recycling Plant).</p> <p>To ensure that notification is undertaken in accordance with the CoA, GTPL has updated the CEMP for Stage AB WRP to provide a clear procedure of the steps involved for notification. This also includes better communication around notification requirements by requesting that the contractor provide information to GTPL on the upcoming notifications likely to be required and issued notifications in the Environmental Monthly Report.</p>
4	No blast monitoring at the nearest residence.	<p>Blast monitoring was not undertaken at the nearest residential receiver which was at least 800 metres away and was considered to be outside the impact zone. However it is noted that while very unlikely that the blast criteria was exceeded given the offset distance, the extrapolations presented in the results did not make this clear.</p> <p>No future blasting is scheduled for Stage A Network (East) however blasting will take place as part of the next construction stage (Stage AB Water Recycling Plant). GTPL will ensure the contractor undertakes monitoring at the nearest receiver (and nearest structure as required). The details of such monitoring are to be provided in a Blast Management Plan to be prepared by the contractor.</p>
5	A Section 143 (s143) notice was not completed for fill movement to the township site.	It is noted that while the fill was transferred from one contractor's area of works to another to be reused – none of the waste was taken beyond the Part 3A boundary and that the entire Part 3A project site is ultimately under the control and responsibility of GTPL. As such it is not considered that a Section 143 notice is required to transfer fill between the different contractor sites.
6	Sewerage waste is being transferred from NSW into ACT. It is unclear whether the contractor's licences permit sewerage waste to be transferred between the two jurisdictions, or whether a more general agreement is in place between the two jurisdictions.	Guideline ACT has confirmed with the sewage waste contractor (ACTQ Pty Ltd) that their license permits the transfer of waste between NSW and the ACT. We can confirm that the sewage is being transferred to Coppins Crossing, not Leppins Crossing as identified in Section 3.7 of the audit report.
7	Cut and paste weed removal methods detailed in Flora and Fauna MP was not completed.	Upon further investigation, Guideline ACT has confirmed that their vegetation clearance contractor (Treworks) undertook the removal of woody weeds (Sweet Briar, Blackberry and Hawthorn) by physical removal and all stumps were removed and repositioned outside the clearance zone to be used as habitat logs.
8	Several of the MSDSs are out of date, these include some site specific MSDSs.	Guideline has checked and updated the SDSs onsite and they are now all current.

8.0 Environmental complaints

8.1 Stage A – Network (west)

There were no environment complaints lodged for Stage A – Network (west) during the reporting period.

8.2 Stage A – Network (east)

8.2.1 Sediment-laden runoff

On 19 July 2013, a complaint was made by the ranger for the Googong Foreshores area (ACT Parks and Conservation Service) regarding sediment-laden runoff into creeks due to heavy rainfall observed coming from the Stage A – Network (east) works.

The complaint was made to QCC and passed onto GTPL. GTPL's IWC Community Liaison Officer contacted the ranger on 31 July 2013 to advise that GTPL had received the complaint. He was advised that the incident had been investigated and measures to improve sediment control on the site were being implemented, as outlined in Section 5.1.1.

8.3 Other

There were no environmental complaints lodged relating to the operation of Stage A Network or construction of Stage AB Water Recycling Plant, as these stages did not commence during the reporting period.

9.0 Conclusion

This Compliance Tracking Report has been prepared for the reporting period that extended from July to December 2013 for the construction Stage A – Network (west), Stage A Network – (east), the pre-operation of Stage A – Network and pre-construction of Stage AB Water Recycling Plant.

As part of this review, two non-compliances against the IWC Project's CoA were identified. The non-compliances related to failure of erosion and sedimentation controls (and delays in notifying) that had the potential to impact the environment; and the failure to provide blasting notification at least two weeks prior to works.

As a result of these non-compliances, the CEMPs for the IWC Project have been updated (including CEMPs prepared for future stages ie Stage AB Water Recycling Plant) to include more detail on notification processes (particularly for blasting) and reporting procedures for environmental incidents.

GTPL has also prepared an Environmental Incident Reporting Flowchart that summarises roles and responsibilities and have amended the Monthly Environmental Report template for future stages so that there is more information on upcoming works that may require notification works and confirmation that notifications have been issued. The purpose of these reviews has been to provide more clarity and detail, particularly around timing and responsibilities, to ensure that notification is properly implemented in the future.

The importance of maintaining erosion and sedimentation controls is now seen as a key area to focus on during construction, particularly for the Stage A – Network (east) works where topography includes steep gradients. It is noted that the fortnightly inspections undertaken by the ER have been an effective way of identifying environmental risks and/or the need to improve controls, particularly with respect to erosion and sedimentation controls. Both contractors action the recommendations after each inspection and they are checked by the ER as part of the next inspection. The ER also approves each revision of Erosion and Sediment Control Plans.

The next reporting period (January to June 2014) is likely to include the following activities: construction of Stage A – Network (west/east) and Stage AB Water Recycling Plant, pre-construction of Stage B – Network and operation of Stage A – Network.

Appendix I

Compliance Tracking Register

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion date	Comment	Verification
1.1	The Proponent shall carry out all related projects generally in accordance with the: (a) Major Project Application 08_0236; (b) EA; (c) Submissions Report; and (d) the terms of this approval.	GTPL	Open	Compliant		Works undertaken during the reporting period have been carried out in accordance with this condition. One consistency assessment was prepared for Stage 1 of the IWC Project, refer Section 2.5 of the Compliance Tracking Report. No modifications were sought by GTPL or issued by DP&I during the reporting period.	
1.2	In the event of an inconsistency between: (a) this Concept Plan approval and any document listed in 1.1(a) to 1.1(c) inclusive, this Concept Plan approval shall prevail to the extent of the inconsistency; and (b) any documents listed in 1.1(a) to 1.1(c) inclusive, the most recent document shall prevail to the extent of the inconsistency.	N/A	N/A	N/A	N/A	Noted.	
1.3	If there is any inconsistency between this Concept Plan approval and any related project approvals, this Concept Plan approval shall prevail to the extent of the inconsistency.	N/A	N/A	N/A	N/A	Noted.	
1.4	The Proponent shall comply with any reasonable requirements(s) of the Director-General arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this Concept Plan approval or any related project approvals; and (b) the implementation of any actions or measures contained in these reports, plans or correspondence.	GTPL and contractor	Open	Compliant		Works undertaken during the reporting period have been carried out in accordance with this condition. No requirements were issued by the Director-General during the reporting period.	
1.5	To avoid any doubt, this Concept Plan approval does not permit the construction or operation of any projects associated with the Googong Township Water Cycle Project. Construction or operation cannot commence on any development associated with this Concept Plan unless a separate planning approval has been granted in relation to that project.	N/A	N/A	N/A	N/A	Noted. A Project Approval is in place for Stage 1 of the IWC Project.	
1.6	The Proponent may, with the Director-General's agreement, elect to meet the conditions of approval of multiple projects associated with this Concept Plan in a single consolidated manner (including through a consolidated plan or other document). In this case, the Proponent shall clearly demonstrate how the requirements of each project approval as well as the requirements of this Concept Plan approval have been addressed in the consolidated plan or document.	N/A	N/A	N/A	N/A	Noted.	
2.1	Pursuant to section 75P(2)(c) of the EP&A Act, the following environmental assessment requirements apply with respect to any future development that is subject to Part 4 or Part 5 of the EP&A Act (which are not exempt or complying development), for the subsequent project stages: (a) a detailed project description, including the design and location of ancillary infrastructure (including access roads and temporary construction compounds) and its relationship to the approved concept and approved project stages; (b) an assessment of relevant statutory matters including land zoning, permissibility and consistency with the objects of the EP&A Act; (c) a demonstration that the project is consistent with the requirements of this Concept Plan approval and generally consistent with the scope and intent of the Concept Plan and environmental impacts outlined in the documents under condition 1.1 of this approval; (d) a risk assessment of the potential environmental impacts of the project, identifying the key issues for further assessment; (e) a description of the measures that would be implemented to avoid, minimise and, if necessary, offset the potential impacts of the project, and ensure that the project is in the public interest; (f) an assessment of the consistency of the potential impacts and proposed mitigation measures with the management plans approved under the Stage 1 Project and subsequent stages; (g) a detailed project-specific statement of commitments; (h) assessment of the following key issues considering all components of the project (including temporary construction facilities) and cumulative impacts from other projects associated with the Concept Plan:	N/A	N/A	N/A	N/A	Condition not applicable to current works. This condition will be met during the development phase of future projects beyond Stage 1.	

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion date	Comment	Verification
	<p>- Surface Water – including potential water quality impacts on local creeks and rivers and impacts on surface water flows, as a result of construction and operation of the project;</p> <p>- Soils and Landscape – including potential soil contamination, erosion risks, irrigation and rehabilitation;</p> <p>- Groundwater – including potential impacts on local recharge levels, contamination risks, groundwater mounding, isolated waterlogging of soils and impacts on groundwater quality;</p> <p>- Flora and Fauna – including terrestrial riparian and aquatic, with accurate estimates of vegetation disturbance associated with the project;</p> <p>- Heritage – both Aboriginal and non-Aboriginal, including an assessment of Aboriginal sites affected by the proposed development, their cultural value and the significance of these values for Aboriginal people;</p> <p>- Human Health – including impacts arising from the application of recycled water and discharges of wastewater and recycled water;</p> <p>- Waste Management – including the likely waste quantities and qualities generated during the construction (including spoil generation) and operation of the project;</p> <p>- Hazards and Risk – including details of hazardous materials used or kept on the premises during the construction and operation phases of the project;</p> <p>- Air Quality – including dust and odour impacts;</p> <p>- Noise and Vibration – including construction and operation noise impacts in the context of planned urban development in the area;</p> <p>- Visual Amenity – an assessment of the impact of the project on visual amenity, including future sensitive receptor areas, including residential;</p> <p>- Traffic and Access – including details of transport routes to and from construction and operational sites and associated impacts to existing activities, including safety impact;</p> <p>(i) evidence of an appropriate level of consultation with (but not necessarily limited to) the following parties, including identification of the issues raised and how these have been addressed in the assessment:</p> <p>- Commonwealth DSEWPac;</p> <p>- OEH (including its Heritage Branch);</p> <p>- Department of Primary Industries (including the NSW Office of Water);</p> <p>- Department of Trade & Investment, Regional Infrastructure & Services (including its Primary Industries Division);</p> <p>- Roads and Traffic Authority;</p> <p>- QCC;</p> <p>- Palerang Council;</p> <p>- relevant service providers;</p> <p>- property owners and the local community; and</p> <p>(j) the environmental assessment of the project must take into account relevant State Government guidelines, policies and plans;</p> <p>(k) the assessments of the subsequent project stages shall take into account, but not limited to the following guidelines, as relevant:</p> <p>- National Water Quality Management Strategy: Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC 2000);</p>						

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion date	Comment	Verification
	<ul style="list-style-type: none"> - National Water Quality Management Strategy - Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (Natural Resource Management Ministerial Council, Environment Protection and Heritage Council and Australian Health Ministers' Conference, 2006); - Environmental Guidelines: Use of Effluent by Irrigation (DEC, 2004); - NSW Industrial Noise Policy (EPA, 2000); - Interim Construction Noise Guidelines (DECC, 2009); - Environmental Noise Management - Assessing Vibration: a Technical Guideline (DECC, 2006); - Environment Criteria for Road Traffic Noise (EPA, 1999); - Approved Methods for the Modelling and Assessment of Air Pollutants in NSW (DEC, 2005); - Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006); - Technical Notes: Assessment and Management of Odour from Stationary Sources in NSW (DEC, 2006). 						
3.1	Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.	GTPL	Open	Compliant		No requests were made to GTPL during the reporting period.	
3.2	Prior to the commencement of construction of any projects associated with this Concept Plan approval, the Proponent shall establish a dedicated website or maintain dedicated pages within its existing website for the provision of electronic information associated with the project. The Proponent shall publish and maintain up-to-date information on this website or dedicated pages including, but not necessarily limited to:	GTPL	Open	Compliant	26-Oct-12	GTPL has established a website for Googong Township Integrated Water Cycle Project. The website provides access to electronic information associated with the works.	http://compliance.googong.net/
	(a) the status of the project;	GTPL	Open	Compliant		GTPL has established a website which provides details on the status of the Stage 1 project.	As above.
	(b) a copy of this approval and any future project approvals and modifications to these approvals;	GTPL	Open	Compliant		GTPL has established a website that provides copies of the Concept and Project Approval issued under the EP&A Act for MP 08_0236, and the Project Approval modification that was issued for CoA A1 and C4 on 22 April 2013.	http://compliance.googong.net/iwc/project-approvals.php
	(c) a copy of each relevant environmental approval, licence or permit required and obtained in relation to the project;	GTPL	Open	Compliant		In addition to the Concept and Project Approvals, the website also has copies of the EPBC Act approval, Environment Protection Licence (EPL) for construction work, Section 138 certificates and construction certificates issued to date for Stage A Network. Two approvals for water monitoring activities associated with the Water Management Plan have been issued: groundwater licence (under the Water Act 1912) and a Controlled Activity Approval (under the Water Management Act 2000). These are also available on the website.	http://compliance.googong.net/iwc/project-approvals.php
	(d) a copy of each approved plan, report, or monitoring program required by this approval and associated project approvals;	GTPL	Open	Compliant		The website provides copies of all currently approved management plans including the Community Information Plan, Pink-tailed Worm-lizard Protection and Management Plan (EPBC and EP&A Act), Googong Foreshores Interface Management Strategy (EPBC), Landscape Management Plan (Stage A - Network), CEMPs and OEMP for Stage A - Network (west/east), and CEMP for Stage AB WRP.	http://compliance.googong.net/iwc/ http://compliance.googong.net/epbc/
	(e) a summary of the monitoring results of the project, which have been reported in accordance with the various plans and programs approved under this approval and associated project approvals;	GTPL	Open	Compliant		Airblast overpressure and ground vibration monitoring has been undertaken for Stage A - Network (west/east) as part of blasting activities. Water monitoring of sedimentation ponds has also been undertaken after rainfall events. A summary of the monitoring activities undertaken during the reporting period is listed on the project website. Baseline monitoring for surface water, aquatic ecology and groundwater as part of the preparation of the Water Management Plan commenced in September 2013. Results will be included in the final WMP and uploaded to the website once the WMP is approved.	http://compliance.googong.net/iwc/monitoring-auditing-and-compliance.php
	(f) details of the outcomes of compliance reviews and audits of the project, to the satisfaction of the Director-General.	GTPL	Open	Compliant		During the reporting period an independent audit was undertaken on 19 November 2013, a summary of these audits and reviews have been uploaded to the website.	http://compliance.googong.net/iwc/monitoring-auditing-and-compliance.php

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
A1 (modified)	The Proponent shall carry out the project generally in accordance with the: (a) Environmental Assessment (EA); (b) Statement of Commitments; (c) Googong Township Water Cycle Project Modification Assessment, prepared by Manidis Roberts and dated February 2013; and (d) conditions of this approval.	GTPL and contractor	Open	Compliant		Works undertaken during the reporting period have been carried out in accordance with this condition. One consistency assessment was prepared for Stage 1 of the IWC Project, refer Section 2.5 of the Compliance Tracking Report. No modifications were sought by GTPL or issued by DP&I during the reporting period.	
A2	If there is any inconsistency between the documents in condition A1, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	GTPL and contractor	Open	Compliant		Noted.	
A3	The Proponent shall comply with any reasonable requirement(s) of the Director-General arising from the Department's assessment of: (a) any reports, strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with this approval; (b) the implementation of any actions or measures contained in these documents.	GTPL and contractor	Open	Compliant		Works undertaken during the reporting period have been carried out in accordance with this condition. No requirements were issued by the Director-General during the reporting period.	
A4	This project approval shall lapse five years after the date on which it is granted, unless works subject of this approval have commenced before that time.	GTPL	Open	Compliant		Construction commenced in January 2013 (Stage A - Network (west)).	
A5	Construction of the project may be undertaken in discrete work packages or stages. Where that occurs, these conditions of approval need only be complied with to the extent that they are relevant to that discrete work package or stage. Prior to the commencement of relevant construction or operation activities, the Proponent shall submit a Staging Report to the Director-General which: (a) describes the stages; and (b) identifies the relevant conditions of approval for each stage and how these will be addressed across and between the stages of the project.	GTPL	Complete	Compliant	28-Aug-12	GTPL prepared a Staging Report to address this condition which was provided to the Director-General on 7 June 2012. The Staging Report describes the construction stages and details how relevant conditions of approval will be met for each stage. Compliance with the conditions of approval will be monitored and documented through the six monthly compliance report. DP&I advised on 28 August 2012 that the Staging Report met the relevant requirements of the CoA. An update to the stages (namely Stage AB WRP to be built at the same time instead of separate A/B stages) was provided to DP&I on 30 July 2013.	DP&I Acceptance of CTP
A6	With the approval of the Director-General, the Proponent may submit any strategy, plan or program required by this approval on a progressive basis.	GTPL	Open	Compliant		Noted.	
A7	The Proponent shall ensure that all licences, permits and approvals are obtained and maintained as required throughout the life of the project. No condition of this approval removes the obligation of the Proponent to obtain, renew or comply with such licences, permits or approvals. The Proponent shall ensure that a copy of this approval and all relevant environmental approvals are available on the site at all times during the project.	GTPL and contractor	Open	Compliant		In addition to the Concept and Project Approvals, GTPL or its contractors have obtained an EPBC Act approval, Environment Protection Licence (EPL) for construction work, along with Section 138 certificates (refer CoA C15) and construction certificates (refer CoA A12) for Stage A Network. Two approvals for water monitoring activities associated with the Water Management Plan have been issued: groundwater licence (under the Water Act 1912) and a Controlled Activity Approval (under the Water Management Act 2000). A copy of the relevant approvals are kept at the site offices for Stage A - Network (west) and Stage A - Network (east). Not applicable for pre-operation of Stage A - Network or construction of Stage AB WRP during reporting period.	WMP licences and approvals
A8	The Proponent shall ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.	GTPL and contractor	Open	Compliant		Competence, training and awareness requirements are detailed in Section 5 of the CEMPs for Stage A - Network (west/east) and Stage AB WRP. Regular toolbox talks are undertaken to provide information on responsibilities to employees, contractors and sub-contractors. Competence, training and awareness requirements are detailed in Section 5 of the OEMP for Stage A - Network and will be implemented during the operation phase.	
A9	The Proponent shall be responsible for environmental impacts resulting from the actions of all persons that it invites onto the site, including contractors, sub-contractors and visitors.	GTPL	Open	Compliant		Noted.	
A10	Subject to confidentiality, the Proponent shall make all documents required under this approval available for public inspection on request.	GTPL	Open	Compliant		No requests have been made during the reporting period. GTPL will make all documents required under this approval publicly available upon request. GTPL has established a website with copies of relevant documentation.	http://compliance.googong.net/

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
	(f) procedures to inform the community of operational activities, including results of monitoring undertaken in accordance with conditions D7 to D9; (g) procedures to inform the community of their rights, including those relevant to the management of visual and noise amenity and the process for lodgement of complaints, as identified under this Approval.						
A15	Prior to the commencement of construction, the Proponent shall ensure that the following are available for community complaints for the life of each project related to the subject concept plan approval (including construction and operation) or as otherwise agreed by the Director-General: (a) a 24-hour telephone number on which complaints about construction and operational activities at the site may be registered; (b) a postal address to which written complaints may be sent; and (c) an email address to which electronic complaints may be transmitted.	GTPL	Complete	Compliant	26-Oct-12	Details on how to contact GTPL during construction has been provided through targeted mail-outs to potentially affected residents, advertising in local papers, road side signage and the project website. GTPL has established a 24 hour toll-free community information line where complaints/enquiries can be made. GTPL has established a postal address to which written complaints can be sent. GTPL has established an email address to which electronic complaints can be sent.	http://compliance.googong.net/ The phone number is: 1800 838 438 Googong Integrated Water Cycle c/o CIC Australia PO Box 1000 Civic Square ACT 2608 iwc@googong.net
	The telephone number, postal address and email address shall be advertised in a newspaper circulating in the area of the project, on at least one occasion prior to the commencement of construction; and at six-monthly intervals during construction and for a period of two years following commencement of operation of the project. These details shall also be provided on the Proponent's internet site required by condition 3.2 of the associated Concept Plan Approval. The telephone number, the postal address and the email address shall be displayed on a sign near the entrance to the construction site(s), in a position that is clearly visible to the public.	GTPL	Open	Compliant		During the six-month reporting period, one advertisement providing a construction update was included in the Queanbeyan Age on 16 August 2013. Signage has been provided on fencing at the construction sites and contact information uploaded to the website.	
A16	The Proponent shall record details of all complaints received through the means listed in condition A15 of this approval in an up-to-date Complaints Register. The Register shall record, but not necessarily be limited to: (a) the date and time of the complaint; (b) the means by which the complaint was made (telephone, mail or email); (c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect; (d) the nature of the complaint; (e) any action(s) taken by the Proponent in relation to the complaint, including timeframes for implementing the action; and (f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken. The Complaints Register shall be made available for inspection by the Director-General upon request.	GTPL	Open	Compliant		GTPL has established a complaints register to record and manage complaints. The Complaints Management Procedure is included as Appendix B of the Community Engagement and Stakeholder Management Plan. There was one environmental complaint made to QCC and the EPA (which was later forwarded to GTPL) during the reporting period and related to sediment-laden water leaving the Stage A - Network (east) site. The complaint was made on 19 July 2013 and resulted in an EPA investigation (refer Section 8.2.1 and Section 5.2.1 of the Compliance Tracking Report for more information). While the complaint was not made directly through to GTPL through the hotline/website the details were recorded in GTPL's complaints register in accordance with this condition. No requests have been made during the reporting period. GTPL will continue to make the complaints register available for inspection by the Director-General upon request.	
A17	The Proponent shall provide an initial response to any complaints made in relation to the project during construction or operation within 48 hours of the complaint being made. The response and any subsequent action taken shall be recorded in accordance with condition A16. Any subsequent detailed response or action is to be provided within two weeks, or as otherwise agreed by the complainant/Director-General.	GTPL and contractor	Open	Compliant		An environmental complaint relating to sediment laden water made to QCC on 19 July 2013 that was forwarded to GTPL. It is understood that QCC provided an initial response and GTPL provided a more detailed follow up response on 31 July to advise of investigations and follow up actions (refer Section 8.2.1 and Section 5.2.1 of the Compliance Tracking Report for more information). It is considered that GTPL were compliant with this condition as the complaint was not directly made to GTPL through the methods listed above and so were unable to provide the initial response but were involved in the follow up response.	

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
A18	Prior to the commencement of construction, the Proponent shall develop and implement a Compliance Tracking Program, to track compliance with the requirements of this approval during the construction and operation of all project and shall include, but not necessarily be limited to:	GTPL	Open	Compliant	04-Oct-12	GTPL has prepared a Compliance Tracking Program (CTP) to address this condition.	
	(a) provisions for periodic reporting of compliance status to the Director-General including at least prior to the commencement of construction of the project, prior to the commencement of operation of the project and within two years of operation commencement;			Compliant		GTPL has prepared pre-construction compliance reports for both Stage A - Network (west/east) in November and December 2012 respectively. The first construction compliance tracking report was prepared for the period January to June 2013. This compliance tracking table assesses compliance of construction of Stage A - Network (west/east) from July 2013 to December 2013. It also considers the pre-construction of Stage AB WRP and pre-operation phase of Stage A - Network. GTPL will continue to prepare six monthly reports to document compliance with the Minister's Conditions of Approval, Statement of Commitments and other approvals/licenses. Refer to Section 2.2 of the CTP.	
	(b) a program for independent environmental auditing in accordance with AS/NZ ISO 19011:2003 - Guidelines for Quality and/or Environmental Management Systems Auditing;			Compliant		GTPL has prepared a CTP to address this condition. Six-monthly independent audits are proposed during construction. Refer to Section 2.3 of CTP. During the previous reporting period, an independent audit of the IWC Project including site visit of Stage A - Network (east) was undertaken on 19 November 2013 by NGH Environmental and the audit report was provided to DP&I on 6 December 2013. Refer also to Section 7.2 of the Compliance Tracking Report.	
	(c) procedures for rectifying any non-compliance identified during environmental auditing or review of compliance;			Compliant		GTPL has prepared a CTP which outlines procedures for rectifying non compliance. Refer to Section 2.4 of CTP. Findings of the independent audit in November were provided to ACTEW and Guideline who were responsible for	
	(d) mechanisms for recording environmental incidents and actions taken in response to those incidents;					GTPL has prepared a CTP to address this condition. Refer to Section 2.5 of the CTP. Incident recording requirements are outlined in Section 7.2 of the various CEMPs and Section 7.2 of the OEMP for Stage A - Network. Stage A Network (west): There was one Category one incident (Failure of sediment controls) on 19 July 2013 and one Category two incident (Failure of sediment controls) on 19 September 2013. More information about reporting and follow up actions is provided in Section 5.1 of the Compliance Tracking Report. Stage A Network (east): There were two Category one incidents including removal of heritage protective fencing on 1 July 2013, and failure of sediment controls on 19 July 2013. There was one Category two incident (failure of sediment controls) on 19 September 2013. More information about reporting and follow up actions is provided in Section 5.1 of the Compliance Tracking Report.	
	(e) provisions for reporting environmental incidents to the Director-General during construction and operation; and					GTPL has prepared a CTP to address this condition. Refer to Section 2.6 of the CTP. Incident reporting requirements to the Director-General are outlined in Section 7.3 of various CEMPs and Section 7.3 of the OEMP for Stage A - Network.	
	(f) provisions for ensuring all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.					CEMPs and management plans have been developed for Stage A - Network (west/east) and Stage AB WRP that detail the training and induction requirements for all personnel on site. Refer to Section 5 of the CEMPs. Section 4.2 of the OEMP highlights responsibilities for the different operators for Stage A - Network, specific training	
B1	The Proponent shall ensure that all the plant and equipment used on site is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Contractor	Open	Compliant		Plant and equipment has been maintained in a proper condition during the reporting period through the implementation of the mitigation measures detailed in the Stage A - Network (west/east) Air Quality Management Plan.	
B2	Except as may be expressly provided by an Environment Protection Licence for the project, the Proponent shall comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .	Contractor	Open	Non compliant		Legal registers developed as part of the CEMPs for Stage A - Network (west/east), and WRP and the OEMP for Stage A - Network outline the requirement to comply with the POEO Act. However erosion and sedimentation controls were overwhelmed at Stage A - Network (east/west) on 19 July 2013 following heavy rainfall. A complaint was made, the ER raised the non-conformance as Category One incident and the EPA investigated the incident. While no harm was found to occur there was the potential to cause harm. Details on this incident and the follow up response are provided in Section 5.1.1 of the Compliance Tracking Report.	

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B3	<p>The Proponent shall provide a compensatory water supply to any land owner whose water entitlements are adversely impacted (other than an impact that is negligible) as a result of the project, in accordance with the criteria established in the Water Management Plan in condition D8.</p> <p>The compensatory water supply measures shall provide an alternate water supply for the duration of the impact attributed to the project. The alternate water supply shall at least be of an equivalent quality and quantity to the affected supply and be provided within 24 hours of the loss being identified, or as otherwise agreed by the affected resident/land owner.</p> <p>If the Proponent is unable to provide an alternative supply of water, then it shall provide reasonable alternative compensation in consultation with the affected land owner. If the Proponent and the land owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Director-General for resolution.</p>	GTPL	N/A	N/A	N/A	<p>Condition not applicable to construction of Stage A - Network (west/east) or pre-construction of Stage AB WRP.</p> <p>Condition is also not applicable to operation of Stage A - Network, as this stage does not include operation of the WRP and discharge of recycled water downstream. This condition will be met once the WRP and is operational through the implementation of the Water Management Plan (as per CoA D8(b)).</p>	
B4	Erosion and Sediment controls consistent with <i>Managing Urban Stormwater: Soils and Construction Manual</i> (Landcom 2004, or its latest version) are to be installed prior to the commencement of soil disturbance and maintained until such time as the disturbed area has been rehabilitated in accordance with the rehabilitation objectives in the CEMP.	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Soil and Water Management Plans.</p> <p>Erosion and Sediment Control Plans have been prepared, updated and approved by the ER for both sites during the reporting period. Controls have remained in place and been maintained throughout the reporting period.</p> <p>A Soil and Water Management Plan has been prepared as part of the CEMP for the Stage AB WRP. It includes requirements for Erosion and Sediment Control Plans.</p>	
B5	The Proponent shall carry out rehabilitation progressively, and as soon as reasonably practicable following disturbance in accordance with Condition C20(e).	Contractor	Open	Compliant		<p>Compliance with this condition has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Soil and Water Management Plan and Landscape Management Plan. Trenches have been progressively filled as works along the network pipes has progressed. As works are completed in 2014, additional rehabilitation works will be undertaken.</p> <p>Rehabilitation mitigation measures (including progressive backfilling) have been included in the CEMP for the Stage AB WRP and a Landscape Management Plan is being prepared for the WRP.</p>	
B6	The Proponent shall ensure no offensive odours are emitted from the project site, as defined under the <i>Protection of the Environment Operations Act 1997</i> .	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Air Quality Management Plans. There were no odour complaints made during the reporting period.</p> <p>An Air Quality Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
B7	The Proponent shall not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing, or disposal on the site, except as expressly permitted by a licence under the <i>Protection of the Environment Operations Act 1997</i> , if such a licence is required in relation to that waste.	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Waste and Resource Management Plans. No waste incidents were recorded during the reporting period.</p> <p>A Waste and Resource Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
B8	The Proponent shall maximise the reuse and/or recycling of waste materials generated on site, to minimise the need for treatment or disposal of those materials outside the site.	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Waste and Resource Management Plans.</p> <p>A Waste and Resource Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	

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B9	The Proponent shall ensure that all liquid and/or non-liquid waste generated by the project is assessed and classified in accordance with <i>Waste Classification Guidelines</i> (DECC 2008, or any future guideline that may supersede that document) and where removed from the site is only directed to a waste management facility lawfully permitted to accept those materials.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Waste and Resource Management Plans. No waste incidents were recorded during the reporting period. A Waste and Resource Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
B10	The Proponent shall ensure that no green waste is burned on site during the life of the project.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Waste and Resource Management Plans. There were no recorded incidents of green waste being burnt on site during the reporting period. A Waste and Resource Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
B11	The Proponent shall limit the clearing of native vegetation to the minimum extent practicable. Details regarding the procedures for clearing vegetation, minimising the extent of clearing and the extent and location of these reductions shall be included in the Flora and Fauna Management Plan prepared in accordance with condition C20.	Contractor	Open	Compliant		The design of Stage A - Network (west/east) and Stage AB WRP has considered the need to minimise clearing of native vegetation as far as possible. Compliance with this condition is ongoing throughout Stage A - Network (west/east) and Stage AB WRP works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management Plans (FFMP). There were no recorded incidents of excessive vegetation clearing during the reporting period.	
B12	All hollow bearing trees shall be retained to the greatest extent practicable. Where this is not feasible, trees containing hollows shall be inspected by a suitably qualified ecologist prior to disturbance, and where native fauna are located using the tree hollows, procedures shall be developed and implemented under the guidance of the qualified ecologist to minimise impacts on the native fauna. Details of actions to be taken and measures to monitor their effectiveness shall be included in the Flora and Fauna Management Plan.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west) works and has been managed through the mitigation measures detailed in the Stage A - Network (west) Flora and Fauna Management (FFMP) and the Hollow Relocation and Nest Box Strategy. All of the required 10 nest boxes were installed prior to construction. All remained in place at the end of the reporting period. Compliance with this condition is ongoing throughout Stage A - Network (east) works and has been managed through the mitigation measures detailed in the Stage A - Network (east) Flora and Fauna Management (FFMP) and the Hollow Relocation and Nest Box Strategy. All of the required 46 nest boxes have now been installed and remained in place at the end of the reporting period.	
B13	Where possible, the removal of trees which form potential habitat for the Speckled Warbler (<i>Chthonicola sagittata</i>) shall occur outside of the August to January period breeding season of the species. If clearing cannot be avoided during this time, the area must be inspected by a qualified ecologist prior to any disturbance to identify potential nesting sites. If a nesting site is observed and it contains young, the area must be retained for at least 3 weeks to allow the young to fledge.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management (FFMP). Refer to Attachment 2 (Vegetation Clearance Procedure). No clearing was undertaken during the reporting period (ie breeding season for Speckled Warblers).	
B14	The Proponent shall establish and maintain in perpetuity a dedicated area of land on the project site for the conservation of the Pink-tailed Legless Lizard (<i>Aprasia parapulchella</i>) as outlined in the plan prepared in accordance with condition D9 and shown in Appendix 2.	GTPL	Open	Compliant	15-Aug-13	GTPL has prepared a Pink-tailed Worm-lizard Protection and Management Plan to address this condition. The Plan was prepared in accordance with condition D9, and was approved by DP&I on 15 August 2013 (refer attachment). Construction activities for Stage A - Network (west/east) did not encroach within 50 metres of the Pink-tailed Worm-lizard conservation area during the reporting period. The upcoming construction of the Stage AB WRP and the operational activities for Stage A - Network will not take place within 50 metres of the conservation area (triggering year 0) but the OEMP for Stage A - Network references the Pink-tailed Worm-lizard Protection and Management Plan as one of the key environmental management documents that must be implemented for the IWC Project.	DP&I Approval of PTWL Plan
B15	The Proponent shall store and handle all dangerous goods, as defined by the Australian Dangerous Goods Code, strictly in accordance with: (a) all relevant Australian Standards; (b) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Hazard, Risk and Safety Management Plans. An observation of concern was made during the site inspection during the independent audit on 19 November for Stage A - Network (east) as some of the Safety Data Sheets were out of date. These were updated by Guideline following the audit. No other incidents were recorded during the reporting period. A Hazard, Risk and Safety Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	

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	<p>(c) DECC's <i>Environment Protection Manual Technical Bulletin - Bunding and Spill Management</i>.</p> <p>In the event of an inconsistency between the requirements listed from (a) to (c) above, the most stringent requirement shall prevail to the extent of the inconsistency.</p>						
B16	<p>The Proponent shall prepare and implement a Landscape Management Plan for the project. The Plan shall be prepared in consultation with Councils and include, but not necessarily be limited to:</p> <p>(a) an identification of the project elements which may impact on the visual amenity of the area and potential sensitive receiver locations, including residents of the Googong Township urban development area;</p> <p>(b) measures to minimise and/or avoid visual amenity impacts to sensitive receiver locations, including:</p> <p>(i) landscape design, including a schedule of species to be used in landscaping and revegetation;</p> <p>(ii) built elements, including proposed treatments, finishes and materials of exposed surfaces (including colour specifications and samples);</p> <p>(iii) lighting design;</p> <p>(c) details of the timing and progressive implementation the visual mitigation works; and</p> <p>(d) procedures and methods to monitor and maintain landscaped or rehabilitated areas.</p> <p>The Plan shall be prepared and submitted to the Director-General prior to construction, unless otherwise agreed by the Director-General.</p>	GTPL	Open	Compliant		<p>GTPL has prepared a Stage A - Network Landscape Management Plan to address the requirements of this condition. The Landscape Management Plan describes the landscape and rehabilitation measures to be applied to Stage A - Network. Much of the landscaping is yet to be implemented while construction works remain underway.</p> <p>The LMP was provided to QCC and Palerang Council for comment. Comments have been addressed in the final LMP. The LMP was provided to the Director-General 22 October 2012, prior to the commencement of construction.</p> <p>A Landscape Management Plan is being prepared for Stage AB WRP and will be issued to DP&I during the next reporting period.</p>	QCC and Palerang comments on Stage A Network LMP
B17	<p>The Proponent shall:</p> <p>(a) take all practicable measures to mitigate off-site lighting impacts from the construction and operation of the project; and</p> <p>(b) ensure that all external lighting associated with the project complies with Australian Standard <i>AS4282 - 1997 - Control of the Obtrusive Effects of Outdoor Lighting</i>.</p>	GTPL and contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Hazard, Risk and Safety Management Plans. No night time works have taken place and as such lighting has not been required.</p> <p>A Hazard, Risk and Safety Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
C1	<p>Prior to the commencement of construction of the project, the Proponent shall clearly define work areas (including access trails) using the measures outlined in the CEMP under condition C19. All on-site construction movements shall be restricted to these areas to prevent uncontrolled or inadvertent access by vehicles or construction personnel.</p>	GTPL and contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) CEMP which includes maps with clearly defined work areas. No incidents relating to work outside these areas was recorded during the reporting period.</p> <p>A CEMP has also been prepared for Stage AB WRP which includes maps with a clearly defined work area.</p>	

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C2	Prior to commencing construction of the project, the Proponent shall investigate the presence and extent of any soil contamination on the site, including but not limited to the sites identified in the EA.	GTPL	Complete	Compliant	09-Aug-12	GTPL has investigated the presence and extent of potential soil contamination for Stage A - Network and the Stage AB WRP area. A site survey was carried out by Geotechnique on 19 and 20 July 2012. No sites of potential contamination were identified.	Geotechnique report
C3	The Proponent shall ensure any areas affected by the project that are potentially contaminated are remediated prior to commencing construction in those areas. All remediation work shall be conducted in accordance with the requirements of the <i>Contaminated Land Management Act 1997</i> and <i>Contaminated Sites: Guidelines for Consultants Reporting on Contaminated Sites</i> (EPA, 1997).	GTPL	Complete	Compliant		No areas of contamination were identified within the Stage A - Network (west/east) of Stage AB WRP sites prior to construction (refer CoA C2). Should areas of potential contamination be identified during construction of Stage A - Network (west/east) or Stage AB WRP, the potential contamination is to be managed through the implementation of the mitigation measures detailed in the Stage A - Network (west/east) and Stage AB WRP Soil and Water Management Plans.	
C4 (modified)	The Proponent shall salvage, through surface collection, identified artefacts at site GWTP2 prior to the commencement of construction at the water recycling plant site. Salvage should be carried out in accordance with the salvage methods described in Navin Officer Heritage Consultants Pty Ltd October 2012 "Methodology: Googong Township Truck Water Main and Recycled Water System". Salvaged artefacts should be relocated in accordance with the artefact relocation methods as described in Navin Officer Heritage Consultants Pty Ltd, 24 June 2010, "Back to Country Proposal to Reposition Salvaged Aboriginal Artefacts from the Googong New Town (Neighbourhood 1A) Development". The Proponent shall not impact any other item of Aboriginal or non-Indigenous heritage significance identified in the EA.	GTPL	Open	Compliant		Stage A - Network (west) does not directly impact items of Aboriginal or non-Aboriginal heritage. Compliance with this condition will be ongoing for Stage A - Network (west) works and has been managed through mitigation measures detailed in the Stage A - Network (west) Heritage Management Plan. No heritage incidents were recorded during the reporting period. Stage A - Network (east) does not directly impact items of Aboriginal or non-Aboriginal heritage. Compliance with this condition will be ongoing for Stage A - Network (east) works and has been managed through mitigation measures detailed in the Stage A - Network (east) Heritage Management Plan. One Category one heritage incident was recorded on 1 July 2013, and related to the removal of fencing around a heritage artefact (GWTP7) even though the precise location of the artefact is not known. However it is noted that there was no actual impact to any heritage items as a result of this non-compliance with the HMP, and so it is considered that GTPL is still compliant with this condition. The removal of the fencing was reported to DP&I and OEH and was immediately reinstated. Following this incident, an Aboriginal Site Recording form has been lodged to AHIMS to formally record that the specific location of the GWTP7 artefact is not known. Once the ASIR is uploaded to the database, the HMP will be amended to remove the requirement to fence GWTP7, given the specific location is not known. This process is still underway. Refer also to Section 5.2.1.2 of the Compliance Tracking Report. With regards to GWTP2 - Salvage of four artefacts from the GWTP2 site was undertaken on 7 May 2013 as part of the approved salvage, referred to in this condition, prior to the commencement of the construction of Stage AB WRP (where GWTP2 is situated).	GWTP2 Salvage Report
C5	In the event of uncovering unidentified Aboriginal objects or relics, work shall cease immediately in the vicinity of the site and the event shall be reported immediately to OEH and the Department. Relevant works shall not recommence until written authorisation from the Director-General to proceed in those areas has been received.	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Heritage Management Plans. No unexpected finds occurred during the reporting period. A Heritage Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
C6	If during the course of construction the Proponent becomes aware of any previously unidentified non-Indigenous heritage object(s), all works likely to affect the object(s) shall cease immediately and the Heritage Council of New South Wales and the Department shall be notified as soon as practicable in accordance with section 146 of the NSW <i>Heritage Act 1977</i> . Relevant works shall not recommence until written authorisation from the Director-General to proceed in those areas has been received.	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Heritage Management Plans. No unexpected finds occurred during the reporting period. A Heritage Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
C7	Subject to conditions C9 and C10, construction works that would generate audible noise at any sensitive receiver shall only be undertaken during the following hours: (a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; (b) 8:00 am to 1:00 pm on Saturdays; and (c) at no time on Sundays or public holidays. Note: this condition does not apply in the event of a direction from police or other relevant authority for safety reasons.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Noise and Vibration Management Plans. No out of hours works took place and there were no noise complaints during the reporting period. A Noise and Vibration Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
C8	The hours of construction specified under condition C7 may be varied with the prior written approval of the Director-General. Any request to alter the hours of construction shall be: (a) considered on a case-by-case basis;	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works. Procedures for varying hours of construction are detailed in the Stage A - Network (west/east) Noise and Vibration Management Plans. No requests for out of hours works were made during the reporting period. A Noise and Vibration Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	

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	<p>(b) accompanied by details of the nature and need for activities to be conducted during the varied construction hours and any other information necessary to reasonably determine that activities undertaken during the varied construction hours will not adversely impact on the acoustic amenity of receptors in the vicinity of the site; and</p> <p>(c) require that affected residential receivers are informed of the timing and duration of any construction activities approved under this condition at least 48 hours before that work commences.</p>						
C9	<p>Any work generating high noise that has impulsive, intermittent, low frequency or tonal characteristics, including jack hammering, line drilling, pile driving, rock hammering, rock breaking, saw cutting, sheet piling, vibratory rolling but excluding blasting, shall only be undertaken:</p> <p>(a) between the hours of 8.00 am and 6.00 pm Monday to Friday;</p> <p>(b) between the hours of 8.00 am and 1.00 pm Saturday; and</p> <p>(c) in continuous blocks of no more than three hours, with at least one hour respite between each block of work generating high noise impact, where the location of the work is likely to impact the same receivers; except as otherwise approved by the Director-General.</p> <p>For the purposes of this condition "continuous" includes any period during which there is less than a one hour respite between ceasing and recommencing any of the work the subject of this condition.</p>	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Noise and Vibration Management Plans. No out of hours works took place and there were no noise complaints during the reporting period.</p> <p>A Noise and Vibration Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
C10	<p>Blasting associated with the construction of the project is only permitted during the following hours:</p> <p>(a) 9.00 am to 5.00 pm, Mondays to Fridays, inclusive;</p> <p>(b) 9.00 am to 1.00 pm on Saturdays; and</p> <p>(c) at no time on Sundays or public holidays.</p> <p>Where compelling safety reasons exist, the Director-General may permit blasting outside of these hours on a case-by-case basis where any request is accompanied by details of the nature and need for blasting outside the approved hours and the measures to be implemented to minimise impacts.</p>	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Noise and Vibration Management Plans. No blasting was undertaken during the reporting period.</p>	
C11	<p>The Proponent shall implement all reasonable and feasible noise mitigation measures to minimise noise generated by construction of the project, consistent with the requirements of the <i>Interim Construction Noise Guidelines</i> (DECC, July 2009).</p>	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Noise and Vibration Management Plans. The plan has considered the requirements of the Interim Construction Noise Guidelines. No noise complaints were received during the reporting period.</p> <p>A Noise and Vibration Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
C12	<p>The Proponent shall ensure that blasting and vibration resulting from construction of the project does not cause exceedances of the criteria in Table C1.</p>	Contractor	Open	Compliant		<p>No blasting was undertaken during the reporting period, however the independent audit identified an Observation of Concern relating to blasting for Stage A - Network (east) in June and the requirement to ensure the blasting criteria are met at the nearest receiver.</p> <p>Given the distance away from the nearest receivers, measurements were done on site and extrapolated to demonstrate that the criteria were met. As such, it is considered that GTPL are compliant with this condition. However the audit recommended that monitoring at the nearest receiver should take place in order to accurately verify compliance. GTPL will ensure this is done for any future blasting.</p>	

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C13	At least two weeks prior to commencing blasting activities, the Proponent shall notify Council and potentially affected landowners, including details of time, location and frequency of the blasting and providing a contact point for inquiries and complaints.	Contractor	Open	Non compliant		<p>No blasting was undertaken during the reporting period, however the independent audit identified an Observation of Concern relating to blasting for Stage A - Network (east) during the previous reporting period and the requirement to provide at least two weeks advance notice. Notification letters were issued by the contractor on 6/06/2013 only one day prior to blasting being undertaken. As such this is being recorded as a non-conformance.</p> <p>While no more blasting is required for Stage A - Network (west/east) works - more detail on the notification requirements and procedures to notify has been included in an updated Noise and Vibration Management Plan prepare for the upcoming Stage AB WRP to ensure that two weeks notice is provided for any future blasting. GTPL has also included in the monthly report template a section for the contractor to advise GTPL of upcoming blasting, so that GTPL can ensure notification letters are sent out at the appropriate time.</p>	
C14	Prior to the commencement of construction of the project, the Proponent shall assess the condition of roads and footpaths which may be potentially impacted by construction of the project (including over-mass or over-dimensional vehicles), in consultation with the relevant roads authorities.	GTPL	Complete	Compliant	29-Aug-12	A pre-construction dilapidation survey of Googong Dam Road (including of existing pavement, drainage, road furniture and line markings) was carried out by Brown Consulting on behalf of GTPL in August 2012. A copy of the report was issued to QCC, and can be made available upon request.	
C15	The Proponent shall: (a) ensure that any measures to restore roads as a result of the construction of the project, are undertaken in a timely manner, to the satisfaction of the relevant road authority and at the full expense of the Proponent;	GTPL and contractor	Open	Compliant		<p>A pre-construction dilapidation survey of Googong Dam Road (including of existing pavement, drainage, road furniture and line markings) was carried out by Brown Consulting on behalf of GTPL in August 2012. A copy of the report was issued to QCC, and can be made available upon request.</p> <p>Partial reconstruction of some sections of road has been undertaken however complete restoration has not been completed as construction works are still under way. It is likely that major restoration works will be delayed until other stages of the IWC Project are also constructed (eg Stage AB WRP and subdivision works), but partial road restoration will continue as required. Road verges will be restored in accordance with the Landscape Management Plan.</p>	<p>Section 138 Certificates</p>
	Compliant			<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and will be managed through mitigation measures detailed in the Stage A - Network (west/east) Traffic Management Protocols. No traffic/access complaints were received during the reporting period.</p> <p>A Traffic Management Protocol has also been prepared for the Stage AB WRP that include mitigation measures to meet the requirements of this condition.</p>			
	Compliant			<p>Works during the reporting period have been undertaken in consultation with QCC. Two Section 138 Certificates have been issued by QCC for works on Googong Dam Road.</p>			
C16	The Proponent shall: (a) implement best practice air quality management on site, including all reasonable and feasible measures to minimise off-site odour, fume and dust emissions generated by the project; (b) minimise any visible air pollution generated by the project; and (c) regularly assess the meteorological forecasting data, and relocate, modify and/or stop activities on site to ensure compliance with the relevant conditions of this approval.	Contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Air Quality Management Plans. No air quality complaints were received during the reporting period.</p> <p>An Air Quality Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
C17	Prior to the commencement of construction, or as otherwise agreed by the Director-General, the Proponent shall engage a suitably qualified and experienced Environmental Representative(s) whose appointment has been endorsed by the Director-General. The Environmental Representative(s) shall:	GTPL	Complete	Compliant	21-Sep-12	<p>Richard Sharp (NGH Environmental) has been engaged as the Environmental Representative (ER) for Stage 1 and was appointed prior to construction commencing. The ER was endorsed by the Director-General on 21 September 2012 - refer attached correspondence.</p> <p>The ER is independent of the design, construction and operation personnel and is employed by NGH Environmental.</p>	<p>DP&I Approval of ER</p>
	(a) be independent of the design, construction and operation personnel;					<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and Stage AB WRP works. The roles and responsibilities of the ER are outlined in Section 4.1 of the relevant CEMPs. Section 8.1 of the CEMP outlines the ER's role for regular site inspections.</p>	
	(b) oversee the implementation of all environmental management plans and monitoring programs required under this approval and advise the Proponent upon the achievement of all project environmental outcomes;					<p>For Stage A - Network (west/east) the ER has undertaken fortnightly inspections and provided a copy of this report to DP&I, the contractor and to GTPL providing advice in accordance with this condition. A summary of his inspections is included in Section 7.1 of the Compliance Tracking Report.</p>	
	(c) consider and advise the Proponent on its compliance obligations against all matters specified in the conditions of this approval and any other approval, permits and/or licences; and						

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
	<p>(d) have the authority and independence to:</p> <p>(i) recommend to the Proponent reasonable steps to be taken to avoid or minimise unintended or adverse environmental impacts; and</p> <p>(ii) failing the effectiveness of such steps, to recommend to the Proponent that relevant activities are to be ceased as soon as reasonably practicable if there is likely to be a significant risk of an adverse impact on the environment, until reasonable steps are implemented to avoid such impact.</p>						
C18	The Proponent shall act on all recommendations made by the Environmental Representative(s) as soon as practicable, unless otherwise agreed by the Director-General. If the Proponent chooses not to implement recommendations of the Environmental Representative(s), it shall provide written justification of the alternate course of action to the satisfaction of the Director-General within 7 days of receiving the recommendation from the Environmental Representative(s).	GTPL and contractor	Open	Compliant		The ER makes recommendations in each of his inspection reports for the relevant construction stages which are then reviewed and closed out in the next inspection report, (if addressed). All ER recommendations made during the reporting period have been implemented by GTPL or their contractors.	
C19	<p>Prior to the commencement of construction, the Proponent shall prepare and implement a Construction Environmental Management Plan (CEMP) to outline environmental management practices and procedures to be followed during construction of the project. The Plan shall be consistent with the <i>Guideline for the Preparation of Environmental Management Plans</i> (DIPNR 2004, or its latest revision) and shall include, but not necessarily be limited to:</p> <p>(a) a description of all relevant activities to be undertaken on the site during construction, including stages of construction where relevant;</p> <p>(b) details of measures to clearly define work areas (including access trails) using a combination of posts, fencing or markers, and suitably marked up maps, as appropriate.</p> <p>(c) details of mitigation, management and rehabilitation measures specific to the site that would be implemented, including but not limited to the</p> <p>(d) statutory and other obligations that the Proponent is required to fulfill during construction including all relevant approvals, consultations and agreements required from authorities and other stakeholders, and key legislation and policies;</p> <p>(e) a description of the roles and responsibilities for all relevant employees and contractors involved in the construction of the project;</p> <p>(f) a description of relevant training and induction provisions for ensuring that all employees, contractors and sub-contractors are aware of their environmental and compliance obligations under these conditions of approval;</p> <p>(g) measures to monitor and manage dust emissions, including dust generated by traffic on unsealed public roads and unsealed internal access tracks;</p> <p>(h) details of actions to be taken to address identified potential adverse environmental impacts;</p> <p>(i) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified potential adverse environmental impacts;</p> <p>(j) a complaints handling procedure during construction; and</p> <p>(k) procedures for the update of the Construction Environmental Management Plan as necessary.</p>	GTPL	Complete	Compliant	<p>18-Oct-12</p> <p>05-Dec-12</p> <p>11-Dec-13</p>	<p>A CEMP been prepared for Stage A - Network (west) in accordance with this condition. The CEMP was prepared in consultation with a number of agencies and stakeholders. DP&I approved the CEMP on 18 October - approval letter attached.</p> <p>A CEMP been prepared for Stage A - Network (east) in accordance with this condition. The CEMP was prepared in consultation with a number of agencies and stakeholders, including the future operator (ACTEW). DP&I approved the CEMP on 5 December 2012 - approval letter attached.</p> <p>A CEMP been prepared for Stage AB WRP in accordance with this condition. The CEMP was prepared in consultation with a number of agencies and stakeholders. DP&I approved the CEMP on 11 December 2013 - approval letter attached.</p>	<p>Stage A Network West CEMP Approval</p> <p>Stage A Network East CEMP Approval</p> <p>Stage AB WRP CEMP Approval</p>
	<p>(e) a description of the roles and responsibilities for all relevant employees and contractors involved in the construction of the project;</p> <p>(f) a description of relevant training and induction provisions for ensuring that all employees, contractors and sub-contractors are aware of their environmental and compliance obligations under these conditions of approval;</p> <p>(g) measures to monitor and manage dust emissions, including dust generated by traffic on unsealed public roads and unsealed internal access tracks;</p> <p>(h) details of actions to be taken to address identified potential adverse environmental impacts;</p> <p>(i) details of how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified potential adverse environmental impacts;</p> <p>(j) a complaints handling procedure during construction; and</p> <p>(k) procedures for the update of the Construction Environmental Management Plan as necessary.</p>						
	The CEMP shall be prepared in consultation with the relevant authorities and Councils, and submitted for the approval of the Director-General no later than one month prior to the commencement of any construction works associated with the project, or as otherwise agreed by the Director-General. Construction works shall not commence until written approval has been received from the Director-General.			Compliant	18-Oct-12	<p>GTPL prepared the Stage A - Network (west) CEMP in consultation with the following stakeholders: QCC, Palerang Council, OEH, EPA, RMS, DSEWP&C. See correspondence from stakeholders attached.</p> <p>The CEMP was provided to DP&I for approval on 27 July 2012. The Director-General approved the CEMP on 18 October 2012. See correspondence attached.</p>	<p>Agency comments on CEMP</p> <p>Stage A Network West CEMP Approval</p>

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
					05-Dec-12	GTPL prepared the Stage A - Network (east) CEMP in consultation with the following stakeholders: QCC, Palerang Council, OEH, Environment Protection Authority, RMS, DSEWPaC. See correspondence from stakeholders attached. The CEMP was provided to DP&I for approval. The Director-General approved the CEMP on 5 December 2012. See correspondence attached.	Agency comments on CEMP Stage A Network East CEMP Approval
					11-Dec-13	GTPL prepared the Stage AB WRP CEMP in consultation with the following stakeholders: QCC, OEH, Environment Protection Authority, RMS, DSEWPaC. See correspondence from stakeholders attached. The CEMP was provided to DP&I for approval. The Director-General approved the CEMP on 11 December 2013. See correspondence attached.	Agency comments on CEMP Stage AB WRP CEMP Approval
C20	As part of the Construction Environmental Management Plan for the project, prepared under condition C19 of this approval, the Proponent shall prepare and implement the following: (a) a Soil and Water Management Plan to manage water quality impacts and to minimise soil erosion and the discharge of sediments and other pollutants to lands and/or waters during construction. The Plan shall be prepared in consultation with OEH and Councils and shall include, but not necessarily be limited to:	GTPL and contractor	Complete	Compliant	18-Oct-12 05-Dec-12 11-Dec-13	GTPL has prepared a Stage A - Network (west) Soil and Water Management Plan in consultation with the following stakeholders: QCC, Palerang Council, EPA and OEH. GTPL has prepared a Stage A - Network (east) Soil and Water Management Plan in consultation with the following stakeholders: QCC, Palerang Council, EPA, and OEH. GTPL has prepared a Stage AB WRP Soil and Water Management Plan in consultation with the following stakeholders: QCC, NOW, EPA and OEH.	
	(i) detailed engineering designs for the recycled water discharge structure;			N/A		Condition not applicable to construction of Stage A - Network (west/east) or operation phase of Stage A - Network. The design of recycled water discharge structures will be undertaken during detailed design of the Stage AB WRP.	
	(ii) detailed engineering designs and rehabilitation methodology for each category of watercourse crossing;	GTPL and contractor	Complete	Compliant	18-Oct-12 05-Dec-12 11-Dec-13	GTPL has prepared a Stage A - Network (west) Soil and Water Management Plan in accordance with this condition. GTPL has prepared a Stage A - Network (east) Soil and Water Management Plan in accordance with this condition. GTPL has prepared a Stage AB WRP Soil and Water Management Plan in accordance with this condition.	
	(iii) a description of the quantity and source of all water supplies relating to construction, hydro-testing and operation;						
	(iv) a description of any dewatering activities associated with groundwater interception and measures to minimise the impacts associated with dewatering activities, including the disposal or reuse of water;						
	(v) details on potential occurrence of expansive soils and saline areas within the project site and management and mitigation measures;						
	(vi) details of the measures to mitigate the risk of impacting the local groundwater recharge levels (such as the planning of construction works during dry periods and the employment of construction techniques which aim to shorten the time the trenches are left open);						
	(vii) a description of measures to minimise soil erosion and the potential for the transport of sediment to downstream waters, including progressive rehabilitation;						
	(viii) monitoring of impacts on water quality and soils;						

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
C20	(b) a Hazards, Risk and Safety Management Plan to address:	GTPL and contractor	Complete	Compliant	18-Oct-12	GTPL has prepared a Stage A - Network (west) Hazard, Risk and Safety Management Plan in accordance with this condition.	
	05-Dec-12				GTPL has prepared a Stage A - Network (east) Hazard, Risk and Safety Management Plan in accordance with this condition.		
	11-Dec-13				GTPL has prepared a Stage AB WRP Hazard, Risk and Safety Management Plan in accordance with this condition.		
	(i) the safety of construction workers in the event of a flood, bushfire and any other likely hazard or risk;						
	(ii) the management of the risk of fuel spillages and associated activities, with respect to potential groundwater contamination, including an description of designated fuel distribution points;						
	(iii) the safety of the public (such as bushwalkers) near the site during construction, such as installation of signage and fencing as necessary;						
C20	(c) a Traffic Management Protocol to outline the management of traffic impacts that may occur during construction of the project. The Plan shall be developed in consultation with Councils, the RTA and any other relevant road authority and shall include, but not necessarily be limited to:	GTPL and contractor	Complete	Compliant	18-Oct-12	GTPL has prepared a Stage A - Network (west) Traffic Management Protocol in consultation with the following stakeholders: QCC, Palerang Council, and RMS.	
	05-Dec-12				GTPL has prepared a Stage A - Network (east) Traffic Management Protocol in consultation with the following stakeholders: QCC, Palerang Council, and RMS.		
	11-Dec-13				GTPL has prepared a Stage AB WRP Traffic Management Protocol in consultation with the following stakeholders: QCC, EPA and RMS.		
	(i) details of traffic routes for heavy vehicles, including any necessary route or timing restriction for oversized loads;						
	(ii) measures to verify the condition of roads used by construction vehicles prior to and following construction;						
	(iii) details of how the construction of project infrastructure will be managed in proximity to local and regional roads and with respect to sensitive receivers located in close proximity to these roads (such as maintaining access to property) and any other concurrent works occurring in close proximity to the project, such as the Googong Dam Spillway Remediation Works;						
	(iv) detailed consideration of measures to be employed to ensure traffic volumes and acoustic and amenity impacts along heavy vehicle routes are minimised;						
	(v) details of requirements to restore roads used for the construction of the project, including Old Cooma Road and Googong Dam Road; and						
	(vi) demonstration that all statutory responsibilities with regard to road traffic impacts have been complied with;						
C20	(d) a Noise and Vibration Management Plan to identify measures to monitor and manage noise and vibration and to identify all feasible and reasonable noise and vibration mitigation measures. The Plan shall be developed in consultation with OEH and QCC and include, but not necessarily be limited to:	GTPL and contractor	Complete	Compliant	18-Oct-12	GTPL has prepared a Stage A - Network (west) Noise and Vibration Management Plan in accordance with this condition and in consultation with the following stakeholders: QCC and EPA.	
	05-Dec-12				GTPL has prepared a Stage A - Network (east) Noise and Vibration Management Plan in accordance with this condition and in consultation with the following stakeholders: QCC and EPA.		
	11-Dec-13				GTPL has prepared a Stage AB WRP Noise and Vibration Management Plan in accordance with this condition and in consultation with the following stakeholders: QCC, EPA and the OEH.		
	(i) the identification all potentially affected sensitive receivers (such as future residents of the Googong township due to the undertaking of final works associated with the water recycling plant), and noise management levels;						
	(ii) a review of the assumptions made in Appendix J of the EA to the final determined construction noise levels;						
	(iii) details of the measures to avoid and/or mitigate the actual noise levels, including the noise mitigation measures identified under section 13.4.4 of the EA;						
	(iv) an assessment, if blasting is proposed, to calculate the maximum instantaneous charge (MIC) able to be used in order to meet amenity-based ground vibration and overpressure criteria in condition C12;						

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
	(v) details of the consultation process for noise mitigation measures with any affected sensitive receivers; and (vi) details of noise monitoring to be undertaken to manage potentially elevated noise levels;						
C20	(e) a Flora and Fauna Management Plan to outline measures to protect, and minimise the loss of, terrestrial, riparian and aquatic native vegetation and native fauna habitat as a result of construction of the project. The Plan shall be prepared in consultation with OEH, DSEWPaC and QCC, and include, but not necessarily be limited to:	GTPL and contractor	Complete	Compliant	18-Oct-12 05-Dec-12 11-Dec-13	GTPL has prepared a Stage A - Network (west) Flora and Fauna Management Plan in consultation with the following stakeholders: QCC, OEH and Commonwealth Department of Environment (formerly DSEWPaC). GTPL has prepared a Stage A - Network (east) Flora and Fauna Management Plan in consultation with the following stakeholders: QCC, OEH and Commonwealth Department of Environment (formerly DSEWPaC). GTPL has prepared a Stage AB WRP Flora and Fauna Management Plan in consultation with the following stakeholders: QCC, OEH, EPA and Commonwealth Department of Environment (formerly DSEWPaC).	
	(i) procedures for pre-construction surveys to identify key flora and fauna features within and adjacent to the construction area; (ii) procedures to accurately determine the total area, type and condition of vegetation community to be cleared; (iii) plan/s showing terrestrial vegetation communities, important flora and fauna habitat areas, EECs, threatened species (Hoary Sunray <i>Leucochrysum albicans</i> var. <i>tricolor</i> , Speckled Warbler <i>Chthonicola sagittata</i> and Pink-tailed Legless Lizard <i>Aprasia parapulchella</i>), weeds and areas to be cleared. The plans shall also identify vegetation adjoining the site which contains important habitat areas and/or threatened species, populations or ecological communities; (iv) methods to avoid and manage potential impacts on flora and fauna species and their habitat which may be directly or indirectly affected by the project, such as location of fencing to exclude access to sensitive areas, procedures for vegetation clearing or soil removal/stockpiling and procedures for re-locating hollows or installing nesting boxes and managing weeds; (v) measures for conserving and reusing topsoil; (vi) procedures to be implemented for controlling weeds and feral pests; (vii) rehabilitation details and success criteria; (viii) a program for reporting on the effectiveness of flora and fauna management measures; and (ix) a procedure to review management methods where they are found to be ineffective;						
C20	(f) a Heritage Management Plan to manage potential impacts on Aboriginal and non-Indigenous heritage items. The plan shall be prepared in consultation with OEH and include, but not necessarily be limited to: (i) details of measures to be carried out to avoid impacts to known and potential Aboriginal sites and deposits; (ii) procedures for dealing with previously unidentified Aboriginal objects (excluding human remains), including: (iii) procedures for dealing with human remains (including halting of works in the vicinity and notification of the NSW Police, OEH and registered Aboriginal (iv) Aboriginal cultural heritage induction processes for construction personnel and procedures for ongoing Aboriginal consultation and involvement.	GTPL	Open	Compliant	18-Oct-12 05-Dec-12 11-Dec-13	GTPL has prepared a Stage A - Network (west) Heritage Management Plan in accordance with this condition and in consultation with the OEH. GTPL has prepared a Stage A - Network (east) Heritage Management Plan in accordance with this condition and in consultation with the OEH. GTPL has prepared a Stage B WRP Heritage Management Plan in accordance with this condition and in consultation with the OEH, EPA and QCC.	
D1	Noise emitted from the operation of project-related infrastructure shall not exceed 35 dB(A) (LAeq (15min)) at any residence on privately-owned land. <i>Note: Noise generated by the project is to be measured in accordance with the relevant requirements, and exemptions (including certain meteorological conditions), of the NSW Industrial Noise Policy.</i>	GTPL	N/A	N/A	N/A	N/A to construction of Stage A - Network (west/east) or Stage AB WRP. Operation of Stage A - Network had not commenced during the reporting period.	

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
D2	Water provided as drinking water to service the Googong Township, as outlined under the documents referred to in condition A1, shall comply with the <i>Australian Drinking Water Guidelines 2004</i> .	QCC	N/A	N/A	N/A	N/A to construction of Stage A - Network (west/east) or Stage AB WRP. Operation of Stage A - Network had not commenced during the reporting period.	
D3	Ongoing management and monitoring of the supply of the drinking water shall form part of the NSW Drinking Water Monitoring Program.	QCC	N/A	N/A	N/A	N/A to construction of Stage A - Network (west/east) or Stage AB WRP. Operation of Stage A - Network had not commenced during the reporting period.	
D4	Water provided as recycled water to service the Googong Township, as outlined under the documents referred to in condition A1, shall comply with <i>National Water Quality Management Strategy - Australian Guidelines for Water Recycling: Managing Health and Environmental Risks (Natural Resource Management Ministerial Council, Environment Protection and Heritage Council and Australian Health Ministers' Conference, 2006)</i> .	GTPL and QCC	N/A	N/A	N/A	No recycled water has been generated or discharged during the reporting period. However QCC has prepared a Recycled Water Quality Management Plan to support their application to NSW Office of Water under Section 60 of the <i>Local Government Act 1993</i> to construct the WRP.	
D5	The recycled water discharged to the environment shall not exceed the water quality parameters identified in Table D1 below. If the results of water quality monitoring undertaken in accordance with the Water Management Plan in condition D8 indicates that the downstream ambient water quality criteria of the Queanbeyan River is exceeded as a result of the project, then the project shall be adjusted to reduce the concentration of the relevant parameters in the recycled water discharged to the environment.	GTPL and QCC	N/A	N/A	N/A	Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. No recycled water has been generated or discharged during the reporting period. The WRP will be designed so that it can treat sewage to meet the D5 effluent criteria. The OEMP for the Stage AB WRP and Water Management Plan will be the key documents to manage compliance of this condition.	
D6	No recycled water shall be discharged to the environment until at least 12 months of baseline data for the receiving waterways has been obtained and the flow release protocol has been established, in accordance with the approved Water Management Plan in condition D8.	GTPL and QCC	N/A	N/A	N/A	Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. No recycled water has been generated or discharged during the reporting period. Baseline monitoring commence in September 2013.	
D7	The Proponent shall prepare and implement an Operation Environmental Management Plan (OEMP) for the project, in accordance with <i>Guideline for the Preparation of Environmental Management Plans</i> (DIPNR, 2004) or its latest version. The Plan shall be prepared in consultation with Councils, OEH and NOW and include, but not necessarily be limited to: (a) identification of all statutory and other obligations that the Proponent is required to fulfill in relation to the operation of the development, including all consents, licences, approvals and consultations; (b) specific consideration of relevant measures to address any requirements identified in the documents referred to under condition A1; (c) a management organisational chart identifying the roles and responsibilities for all relevant employees involved in the operation of the project; (d) overall environmental policies and principles to be applied to the operation of the project; (e) management policies to ensure that environmental performance goals are met and to comply with the conditions of this approval; (f) standards and performance measures to be applied to the project, and means by which environmental performance can be periodically reviewed and improved (where appropriate), including what actions will be taken to address identified potential adverse environmental impacts. In particular, the following environmental performance issues shall be addressed in the Plan: (i) detailed contingency procedures for dealing with: power failures; sewer overflow following failures at the sewage pumping stations and/or during extended periods of wet weather flows; and structural failures in the sewage and recycled water transfer pipeline infrastructure; (ii) noise emissions including measures for regular performance monitoring of noise generated by the project and measures to proactively respond to and deal with noise complaints; (iii) air quality impacts, particularly odour; (iv) operational traffic impacts, particularly during maintenance, and procedures to restore any damage attributable to the project during the operation phase; (v) mosquito control and the potential for algal blooms;	GTPL, contractors, QCC and ACTEW	Open	Compliant	14-Oct-13	Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. GTPL has prepared an OEMP for the operation of Stage A - Network in accordance with this condition that was submitted to the relevant agencies for comment during 2013 (refer attached comments table). It was approved by DP&I on 14 October 2013, however operation of Stage A - Network did not commence during the reporting period. Compliance during operations will be addressed in the next reporting period.	Agency comments on OEMP
	(v) mosquito control and the potential for algal blooms;			N/A		Mosquito risks occur as a result of the operation of the WRP and introduction of recycled water to the environment - as such it is not applicable to the operation of Stage A Network, but will be addressed in future OEMP/s for the IWC Project.	

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
	(vi) impacts of operational activities on the Googong Dam and foreshores area, particularly water quality;			Compliant			
	(vii) hazard and safety and emergency management measures including measures to prevent and control bushfires;						
	(g) procedures for the periodic review and update of the Operation Environmental Management Plan as necessary;						
	(h) the Management Plans listed under conditions D8 and D9; and						
	(i) the environmental monitoring requirements outlined under this approval.						
	The OEMP shall be submitted for the approval of the Director-General no later than one month prior to the commencement of Operation of the project or within such period as otherwise agreed by the Director-General. Operation activities shall not commence until written approval has been received from the Director-General.				14-Oct-13		DP&I Approval of OEMP
D8	The Proponent shall prepare and implement a Water Management Plan for the project to manage potential impacts on surface water and groundwater systems during operation of the project. The plan must be prepared in accordance with <i>Australian and New Zealand Guidelines for Fresh and Marine Water Quality</i> (ANZECC & ARMCANZ, 2000), particularly Volume 1, Chapter 5: <i>Guidelines for Recreational Water Quality and Aesthetics and Volume 2, section 8.2.3: Aquatic Ecosystems</i> , and include:	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. GTPL has prepared a Water Management Plan (WMP) to address this condition and which includes the monitoring programs and plans required by this condition. Baseline monitoring commenced in September 2013. The WMP will be updated and issued to agencies for their review once baseline monitoring has been completed, and then issued to DP&I for approval prior to any discharge of recycled water to the environment.	
D8	(a) a Surface Water Monitoring Program, including: (i) procedures to obtain detailed baseline data on surface water flows and quality in creeks and other waterbodies that could potentially be affected by the project, including relevant parameters and monitoring locations; (ii) surface water and stream health impact assessment criteria including trigger levels for investigating any potentially adverse surface water impacts and for the supply of compensatory water; (iii) a program to monitor and assess: - surface water flows and quality; - impacts on water users; - stream health and habitat; and - channel stability;	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. GTPL has prepared a Water Management Plan that includes a Surface Water and Aquatic Ecology Monitoring Program to meet the requirements of this condition. Refer to Appendix A of the WMP.	
D8	(b) a Groundwater Monitoring Program, including: (i) detailed baseline data of groundwater levels, yield and quality in the region, and privately-owned groundwater bores, that could be affected by the project; (ii) groundwater impact assessment criteria including trigger levels for investigating any potentially adverse groundwater impacts; (iii) a program to monitor and assess: - impacts on the groundwater supply of potentially affected landowners; - impacts on any groundwater dependent ecosystems and riparian vegetation;	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. GTPL has prepared a Water Management Plan that includes a Groundwater Monitoring Program to meet the requirements of this condition Refer to Appendix B of the WMP.	

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
D8	<p>(c) a Recycled Water Flow Release Protocol, including:</p> <p>(i) recommended discharge rates based on baseline data of receiving waterways and meteorological conditions;</p> <p>(ii) the detailed design and operation specifications for the discharge structure/s;</p> <p>(iii) procedures for the review and amendment of flow release protocols based on the outcomes of monitoring;</p>	GTPL	Open	Compliant		<p>Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP.</p> <p>GTPL has prepared a WMP that includes a Recycled Water Flow Release Protocol to meet the requirements of this condition. Refer to Appendix C of the WMP.</p>	
D8	<p>(d) a Surface and Ground Water Response Plan, including:</p> <p>(i) a response protocol for any exceedances of the surface water and groundwater assessment criteria;</p> <p>(ii) measures to notify and compensate landowners of privately-owned land whose water supply is adversely affected by the project; and</p> <p>(iii) measures to mitigate and/or offset any adverse impacts on waterways, groundwater dependent ecosystems and/or riparian vegetation; and</p>	GTPL	Open	Compliant		<p>Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP.</p> <p>GTPL has prepared a Surface and Ground Water Response Plan to meet the requirements of this condition. Refer to Appendix D of the WMP.</p>	
D8	<p>(e) an Irrigation Management Plan prepared in accordance with relevant guidelines including <i>Environmental Guidelines: Use of Effluent by Irrigation</i> (DEC, 2004) and <i>National Guidelines for Water Recycling: Managing Health and Environmental Risks</i> (Natural Resource Management Ministerial Council, Environment Protection and Heritage Council and Australian Health Ministers' Conference, 2006), which must:</p> <p>(i) include detailed baseline data of the soil properties of the proposed irrigation areas, including salinity levels and a nutrient budget;</p> <p>(ii) identify any potential off-site risks and impacts and describe measures to minimise any environmental impacts;</p> <p>(iii) include a protocol for the use of recycled effluent for irrigation including application rates and restrictions; and</p> <p>(iv) include a program to monitor areas subject to irrigation.</p>	GTPL	Open	Compliant		<p>Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP.</p> <p>GTPL has prepared an WMP that includes an Irrigation Management Plan to meet the requirements of this condition. Refer to Appendix E of the WMP.</p>	
D8	<p>The Water Management Plan and sub-plans shall be prepared in consultation with OEH, NOW, NSW Health and DTIRIS (Fisheries), and be submitted to the Director-General for approval by the end of June 2012 and prior to commencing operation of the project, unless otherwise agreed by the Director-General.</p>	GTPL	Open	Compliant		<p>Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP.</p> <p>An extension for the submission of the WMP to 29 March 2013 was received on 21 September 2012 - refer attached correspondence. Draft WMP was submitted to DP&I for review on 26 March 2013. The latest version of the WMP was then issued in December 2013 following more consultation and review. The WMP will not be updated until the baseline monitoring is complete, after which time it will be re-issued to agencies for their review, and then to DP&I for approval prior to the discharge of recycled water to the environment.</p> <p>GTPL has prepared the WMP in consultation with OEH, NOW, NSW Health and DTIRIS (Fisheries) - (refer attachment). Further consultation will take place once the WMP is updated after baseline monitoring.</p>	<p>DP&I extension of WMP</p> <p>Agency comments on WMP</p>
D9	<p>The Proponent shall prepare and implement a Pink tail worm lizard protection and management plan for the project to provide and maintain habitat for the Pink-tailed Legless Lizard in accordance with condition B14. This plan must be prepared in consultation with OEH and DSEWP&C, and be submitted to the Director-General for approval by the end of June 2012. The plan must:</p>	GTPL	Open	Compliant	15-Aug-13	<p>GTPL has prepared a Pink-tailed Worm-lizard Protection and Management Plan to address this condition. The Plan was prepared in accordance with condition D9, and was approved by DP&I on 15 August 2013 (refer attachment). Implementation of the plan is only required when developed is in the year 0 trigger line. No works during the reporting period were undertaken in this area, as such the mitigation measures are yet to be implemented by GTPL.</p>	<p>DP&I Approval of PTWL Plan</p>

CoA	Synopsis of Condition	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
	<p>(a) be prepared or peer reviewed by a suitably qualified ecologist;</p> <p>(b) be based on the recommendations in the EA and the objectives of the National Recovery Plan for the species;</p> <p>(c) outline the roles and responsibilities of parties that would implement the plan;</p> <p>(d) set out the appropriate objectives, actions and milestones for the Proponent, prior to handing over ownership of this land to QCC;</p>				17-Jul-12	This Plan was developed in consultation with Office of Environment and the DSEWPac (DSEWPac). See letter of approval from DSEWPac attached dated 17 July 2012.	DSEWPac Approval of PTWL Plan
	<p>(e) include:</p> <p>(i) procedures to survey and mark the boundary of the conservation area and a 20 metre buffer zone;</p> <p>(ii) procedures for the establishment and maintenance of boundary fencing, including measures to promote kangaroo grazing;</p> <p>(iii) procedures and success criteria for habitat restoration and weed</p> <p>(iv) procedures to control and monitor access and use of the conservation area by domestic and feral animals;</p> <p>(v) a community education program;</p> <p>(vi) procedures to achieve long-term security for the conservation area;</p> <p>(vii) a program to monitor the Pink-tailed Legless Lizard population within the conservation area; and</p> <p>(viii) a program which sets out milestone dates for achieving the actions and measures in the plan.</p>						
D10	Prior to the commencement of operation of the project, the Proponent shall assess the condition of all public roads and footpaths traversed by construction traffic associated with the project (including over-mass or over-dimensional vehicles) in consultation with the relevant road authorities. Should this assessment identify any damage to roads or footpaths attributable to the project, the Proponent shall repair the damage to the satisfaction of the relevant road authority.	GTPL	Open	Compliant	29-Aug-12	<p>A pre-construction dilapidation survey of Googong Dam Road (including of existing pavement, drainage, road furniture and line markings) was carried out by Brown Consulting on behalf of GTPL in August 2012. A copy of the report was issued to QCC, and can be made available upon request.</p> <p>Partial reconstruction of some sections of road has been undertaken however complete restoration has not been completed as construction works are still under way. It is likely that major restoration works will be delayed until other stages of the IWC Project are also constructed (eg Stage AB WRP and subdivision works), but partial road restoration will continue as required. Road verges will be restored in accordance with the Landscape Management Plan.</p>	
D11	Prior to the commencement of operation, the Proponent shall submit to the Director-General details of recommendations made by the relevant road authority and how these have been addressed.	GTPL	N/A	N/A	N/A	Operation had not commenced during the reporting period.	
E1	The Proponent shall notify the Director-General and any other relevant agencies of any incident associated with the project as soon as practicable after the Proponent becomes aware of the incident. Within 7 days of becoming aware of the incident, the Proponent shall provide the Director-General and any relevant agencies with a detailed report on the incident.	GTPL and contractor	Open	Compliant		There were two Category one incidents that were reported to DP&I during the reporting period (refer Section 5.0 of the Compliance Tracking Report for details). Follow up responses were also provided including a Root Cause Analysis.	
E2	The Proponent shall meet the requirements of the Director-General to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition E1 of this approval, within such period as the Director-General may require.	GTPL and contractor	N/A	N/A	N/A	The Director-General and DP&I did not advise of any additional requirements with respect to the two Category one incidents.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
A1	Avoid impacts on and monitor changes to aquatic ecology.	<p>Aquatic ecology impacts are considered under WQ4.</p> <p>A water quality and aquatic ecology monitoring program will be developed to monitor construction and operation impacts of the Project on waterways (refer to WQ4 for further details). The monitoring program will include siting of the aquatic ecology monitoring location to ensure viable comparison with historical and other recent river ecology data.</p> <p>Riparian vegetation, weeds and invasive scrub will be managed within the Googong township site. This will include surveying, mapping and managing invasive species.</p>	GTPL	Open	Compliant		<p>Noted.</p> <p>Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP.</p> <p>GTPL has prepared a WMP, as required by CoA D8 that incorporates the requirements of this SoC and SoC WQ4 and includes a Surface Water and Aquatic Ecology Monitoring Program. Refer to Appendix A of the WMP.</p> <p>Collection of baseline data commenced September 2013.</p> <p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) and Stage AB WRP works and will be managed through the mitigation measures detailed in the Stage A - Network (west/east). Refer to Attachment 2 of the Floor and Fauna Management Plans (Weed Management Strategy).</p>	
A2	Minimise impacts on aquatic habitats.	<p>Riparian zones within the Googong township site will be revegetated with species of local provenance to increase stability.</p> <p>Further measures to ensure minimal impact on aquatic habitats are addressed in Statement of Commitments WQ1-WQ5.</p>	GTPL	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west) works and will be managed through mitigation measures detailed in the Stage A - Network (west) Flora and Fauna Management Plan. The Stage A - Network Landscape Management Plan also provides detail on revegetation measures to be implemented as part of Stage A - Network (west).</p> <p>There are no riparian zones affected by the construction of Stage A - Network (east) or the Stage AB WRP. No specific mitigation measures required for these stages.</p>	
AQ1	Ensure detailed design and urban layout of the Googong township meet air quality requirements for odour.	<p>The dispersion modelling undertaken as part of the Googong New Town WRP Odour Impact Assessment will be validated at a later stage in the design, for the ultimate development. This will include consideration of:</p> <ul style="list-style-type: none"> Site-specific meteorological data, collected at the WRP site for at least 12 months prior to commissioning. Site specific odour data collected during and following commissioning, prior to the residential development of the immediate area west of the WRP. 	GTPL	Open	Compliant		<p>Condition not applicable to Stage A - Network (west/east) or operation of Stage A - Network.</p> <p>This condition applies to the detailed design of Stage AB WRP that is to occur during 2014.</p> <p>Meteorological data collection at the WRP site commenced in July 2013, more than 12 months prior to the scheduled commissioning of the WRP.</p> <p>Condition not applicable to construction of Stage A - Network (west/east), Stage AB WRP or operation of Stage A - Network. Odour data for the Stage AB WRP will be collected during commissioning stages of the WRP.</p>	
AQ2	Minimise odour impacts of WRP and SPS at nearby receivers.	<p>Odour control facilities at the SPSs and the WRP will be installed as detailed in the EA (refer to Sections 4.4.2 and 5.13 of Appendix B).</p>	GTPL and contractor	Open	Compliant		<p>Odour control facilities at SPS1 have been constructed as part of Stage A - Network (west). The odour control unit and SPS1 aerator will be switched on during operation of Stage A - Network in 2014.</p> <p>Condition not applicable to Stage A - Network (east), as it does not include sewage infrastructure.</p> <p>Odour control facilities for the Stage AB WRP are to be included as part of the detailed design and construction which is to take place during 2014.</p>	
AQ3	Monitor, verify then act on odour complaints.	<p>Odour complaints will be registered and investigated. Verified odour issues will be addressed with engineering, operational or other mitigation and management measures.</p>	GTPL	Open	Compliant		<p>Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP.</p> <p>GTPL has prepared an OEMP for Stage A - Network that considers odour risks and complaints. Operation had not commenced during the reporting period, and there were no odour complaints recorded during the reporting period.</p>	
AQ4	Minimise the impact of construction activities on dust generation.	<p>The CEMP will include typical dust suppression measures. Nuisance dust will be minimised by:</p> <ul style="list-style-type: none"> Reducing speed limits during high dust conditions. Clearing vegetation and topsoil only within the designated footprint. Progressive reinstatement of disturbed areas. Employment of water trucks to reduce dust in dry, windy conditions. 	GTPL and contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Air Quality Management Plans. No dust complaints were received during the reporting period.</p> <p>An Air Quality Management Plan has also been prepared for the Stage AB WRP that includes mitigations measures to address this requirement.</p>	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
AQ5	Minimise dust generated by construction activities such as blasting.	Blasting will be conducted at appropriate times, with consideration of site conditions and sensitive receivers.	Contractor	Open	Compliant		Air quality impacts associated with blasting has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Noise and Vibration Management Plans, Air Quality Management Plans, and the Blast Management Plans. No dust complaints were received during the reporting period. An Air Quality Management Plan, and Noise and Vibration Management Plan has also been prepared for the Stage AB WRP that includes mitigations measures to address this requirement.	
AQ6	Manage construction activities according to weather conditions to minimise the potential for dust storms.	Working practices will be modified during periods of high winds by limiting the use of some machinery, particularly when in close proximity to dwellings, and reducing vehicle travel speeds.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Air Quality Management Plans. No dust complaints were received during the reporting period. An Air Quality Management Plan has also been prepared for the Stage AB WRP that includes mitigations measures to address this requirement.	
AQ7	Avoid adverse impacts on air quality due to smoke.	The burning of material on site will be prohibited, except under the instruction of fire services.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Air Quality Management Plans. No burning took place on site and no smoke-related complaints were received during the reporting period. An Air Quality Management Plan has also been prepared for the Stage AB WRP that includes mitigations measures to address this requirement.	
AQ8	Minimise emissions from vehicle use.	Vehicles will be well maintained to ensure emissions are kept to the minimum practicable.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Air Quality Management Plans. No air quality complaints were received during the reporting period. An Air Quality Management Plan has also been prepared for the Stage AB WRP that includes mitigations measures to address this requirement.	
C1	Put management systems in place for protection of the environment.	A construction environmental management plan (CEMP) will be developed in consultation with relevant agencies to manage the environmental issues assessed in this EA and implement the identified mitigation and management measures where required.	GTPL and contractor	Complete	Compliant	18-Oct-12 05-Dec-12 11-Dec-13	A CEMP been prepared for Stage A - Network (west). The plan was provided to relevant authorities/agencies for comment in June and July 2012. Comments were addressed and the revised Stage A - Network (west) was submitted to DP&I. DP&I approved the CEMP on 18 October 2012 - refer attached approval letter. A CEMP been prepared for Stage A - Network (east). The plan was provided to relevant authorities/agencies for comment in June and July 2012. ACTEW (as the Principal and the future owner operator) were also consulted during development of the Stage A - Network (east) CEMP. Comments were addressed and the revised Stage A - Network (east) was submitted to DP&I. DP&I approved the CEMP on 5 December 2012 - refer attached approval letter. A CEMP been prepared for Stage AB WRP. The plan was provided to relevant authorities/agencies for comment in 2013. Comments were addressed and the revised Stage AB WRP CEMP was submitted to DP&I. DP&I approved the CEMP on 11 December 2012 - refer attached approval letter.	Stage A Network West CEMP Approval Stage A Network East CEMP Approval Stage AB WRP CEMP Approval
C2	Minimise impacts on human amenity as a result of construction hours.	Construction work will generally be undertaken between the hours of 6.00am and 7.00pm Monday to Friday, and 8.00am to 1.00pm Saturdays. At all other times, construction noise levels will be as agreed with the relevant receiver(s).	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Noise and Vibration Management Plans. Construction during the reporting period was undertaken during the approved hours and no out of hours complaints were received. A Noise and Vibration Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
CS1	Ensure effective consultation with community and other stakeholders is continued.	A combined consultation strategy for community stakeholders and key government agencies will continue to be implemented throughout the Project. The outcomes of ongoing consultation will continue to influence the Project.	GTPL	Open	Compliant		GTPL has prepared a Stage 1 Community Engagement and Stakeholder Management Plan. The actions of this plan have been implemented during the reporting period. In addition a Bush on Boundary (BOB) group has been formed for the Googong Township and includes representatives from local catchment management authorities, QCC and community members. The BOB group had their first meeting on 19 September 2013, where the water monitoring program was discussed. This program was consequently amended based on the feedback of the BOB group to provide a more robust baseline data set.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
CS2	Ensure all affected stakeholders are kept informed of the construction schedule.	During construction, affected communities will be informed prior to the start of any works in their area and will be notified at regular intervals throughout the construction process according to a project-specific community engagement and stakeholder management plan.	GTPPL and contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage 1 Community Engagement and Stakeholder Management Plan and Community Information Plan.</p> <p>During the reporting period, no new construction stages or significant new works commenced and so no notification letters were required to be issued. Notification letters will be issued prior to commencement of construction works for the Stage AB WRP which is scheduled to commence during the next reporting period.</p>	
CS3	Ensure coverage of water cycle issues in the broad community education strategy for the Googong township.	A community education strategy will be developed, which will focus on minimising environmental and human health risks associated with the use of recycled water.	GTPPL	Open	Compliant		<p>Condition not applicable to construction stages (ie Stage A - Network (west/east) and Stage AB WRP).</p> <p>GTPPL has prepared a Community Education Strategy for Stage 1 of the Googong Township Integrated Water Cycle Project. In addition QCC has prepared a Recycled Water Quality Management Plan that also details education and consultation strategies. GTPPL and QCC will progress actions as the IWC Project moves into operation phase.</p>	
D1	Ensure final location and design of all water cycle infrastructure minimise impacts on natural environment and human health.	Any location and/or design changes will be subject to a consistency assessment, informed through a desktop analysis of each of the environmental issues addressed in this EA.	GTPPL	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the Compliance Tracking Program (CTP) developed to meet CoA A18. The CTP details the commitment to ensure design changes are assessed for consistency with the approved project.</p> <p>There was one consistency assessment undertaken during the reporting period which was for the use of a storage dam during commissioning of Stage A - Network (west). Refer Section 2.5 of the Compliance Tracking Report.</p>	
D2	Ensure final location and design of all water cycle infrastructure minimise impacts on natural environment and human health.	Where any final location and/or design changes are not generally consistent with the Part 3A approval of the Project, the proponent will apply for modification under Section 75W of the EP&A Act.	GTPPL	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) and Stage AB WRP works and has been managed through the CTP which details the commitment to ensure design changes are assessed for consistency with the approved project.</p> <p>GTPPL submitted an application for a modification to CoA C4 which related to impacts to know heritage items at the GWTP2 site. Options to relocate the WRP to avoid the GWTP2 site was undertaken however the preferred option was found to result in impacts to the site. As such, an application to modify the condition to allow for salvage and relocation of artefacts from the GWTP2 site was approved by DP&I on 23 April 2013.</p> <p>No other modifications have been issued for the IWC Project.</p>	Project Approval modification
D3	Ensure final location and design of all water cycle infrastructure minimise impacts on natural environment and human health.	The construction and operation of the Project will comply with QCC's Development Specification – Googong.	GTPPL and contractor	Open	Compliant		The Stage A - Network (west/east) and Stage AB WRP CEMPs have been prepared with consideration of the QCC's Development Construction Specifications. QCC has been provided with a copy of each CEMP for review and found the document to be adequate.	
F1	Protect native flora and fauna.	A flora and fauna management plan will be prepared prior to construction as part of the CEMP. All feasible and reasonable measures will be undertaken to minimise the impact of construction on native vegetation and fauna including:	GTPPL	Complete	Compliant	<p>18-Oct-12</p> <p>05-Dec-12</p> <p>11-Dec-13</p>	<p>GTPPL has prepared a Stage A - Network (west) Flora and Fauna Management Plan in consultation with the following agencies: QCC, OEH and Department of Sustainability, Water, Environment, Population and Communities.</p> <p>GTPPL has prepared a Stage A - Network (east) Flora and Fauna Management Plan in consultation with the following agencies: QCC, OEH and Department of Sustainability, Water, Environment, Population and Communities.</p> <p>GTPPL has prepared a Stage AB WRP Flora and Fauna Management Plan in consultation with the following agencies: QCC, EPA, OEH and the Commonwealth Department of Environment (formerly DSEWPaC).</p>	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
		<ul style="list-style-type: none"> Minimising the disturbance of native flora and hollow-bearing trees. 	GTPL and contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management Plans. Ten of the required nest boxes were installed prior to construction for Stage A - Network (west) and remained in place at the end of the reporting period. All of 46 required nest boxes have now been installed for Stage A - Network (east) and remained in place at the end of the reporting period. For both stages there were no recorded incidents of clearing beyond the survey limits.</p> <p>A Flora and Fauna Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
		<ul style="list-style-type: none"> Implementing weed control measures. 					<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management Plans (Weed and Pest Management Strategy).</p> <p>A Flora and Fauna Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
		<ul style="list-style-type: none"> Revegetating with endemic species. 					<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management Plans and the Stage A - Network Landscape Management Plan, developed to meet CoA B16.</p> <p>A Flora and Fauna Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement. A Landscape Management Plan is being prepared for Stage AB WRP.</p>	
		<ul style="list-style-type: none"> Minimising soil disturbance. 					<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management Plans.</p> <p>A Flora and Fauna Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
		<ul style="list-style-type: none"> Implementing clearing protocols to protect flora and fauna. 					<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management Plans. Refer to Table 5.1 and Attachment 2 (Vegetation Clearing Procedure). Areas to be protected (i.e. Endangered Ecological Communities) have been fenced off with signage. Tree felling was undertaken under the supervision of a qualified ecologist.</p> <p>A Flora and Fauna Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
F2	Protect threatened flora and fauna.	The Flora and fauna management plan (within the CEMP) will contain specific additional measures for threatened species, including:	GTPL	Complete	Compliant	18-Oct-12	GTPL has prepared a Stage A - Network (west) Flora and Fauna Management Plan in consultation with the following agencies: QCC, OEH and DSEWPaC.	
						05-Dec-12	GTPL has prepared a Stage A - Network (east) Flora and Fauna Management Plan in consultation with the following agencies: QCC, OEH and DSEWPaC.	
						11-Dec-13	GTPL has prepared a Stage AB WRP Flora and Fauna Management Plan in consultation with the following agencies: QCC, EPA, OEH and the Commonwealth Department of Environment (formerly DSEWPaC).	
		<ul style="list-style-type: none"> Only approved works will be undertaken within 5m of a threatened species and exclusion fencing will be erected around threatened flora species and threatened fauna habitats and maintained in place until such time as construction works are completed, unless otherwise approved by OEH. 	GTPL and contractor	Complete	Compliant		<p>The requirements of this commitment has been managed through the mitigation measures in the Stage A - Network (west/east) Flora and Fauna Management Plans that detail management measures for working in proximity to native vegetation (flora and fauna constraints maps). Areas to be protected (i.e. Endangered Ecological Communities) have been fenced off with signage throughout the reporting period.</p> <p>There are no threatened species/habitat present at the Stage AB WRP site, and so no exclusion fencing will be required.</p>	
		<ul style="list-style-type: none"> Site-specific management measures will be implemented for the protection of the Pink-Tailed Worm Lizard near the site proposed for SPS2 and at Hill 800, and for the Hoary Sunray near the BWPS site, including exclusion zones, signage and pre-construction surveys. These works will be undertaken under the supervision of an appropriately qualified ecologist. 		Open			<p>Condition not applicable to construction of Stage A - Network (west) or Stage AB WRP.</p> <p>GTPL has prepared a Stage A - Network (east) Flora and Fauna Management Plan that details management measures for working in proximity to Hoary Sunray population (flora and fauna constraints maps). The Hoary Sunray population remained fenced off during the reporting period.</p> <p>No works occurred near Pink-tailed Worm-lizard conservation areas during the reporting period.</p>	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
F3	Protect terrestrial flora and fauna.	An Operational environmental management plan (OEMP) will be prepared for the Project, and implemented. This will detail emergency, spill and maintenance procedures as well as monitoring and reporting regimes as they relate to the protection of terrestrial and aquatic ecology.	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP. GTPL has prepared an OEMP for Stage A - Network but operations for this stage do not involve discharge of water to the environment or risks to aquatic ecology. The OEMP for the Stage AB WRP and the Water Management Plan will be the key documents to manage the requirements of this condition. Baseline monitoring for the WMP commenced in September 2013.	
G1	Prevent impacts to groundwater recharge.	Timing of trench construction will be monitored and planned to ensure, where practical, the time the trench is open is reduced and during periods of low rainfall.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Soil and Water Management Plans. No groundwater issues were identified during the reporting period. A Soil and Water Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
G2	Minimise groundwater contamination	Site environmental management measures will be developed and outlined in the CEMP with the purpose of minimising the potential for spills to occur and implementing remedial actions (refer to SG1). These will include: <ul style="list-style-type: none">Mapping unregistered nearby groundwater bores, if identified.Ensuring that all refuelling, where possible, occurs at designated fuel distribution points. These points will be underlain by compacted earth to prevent the significant loss of fuel to the ground during a spill and will be bunded to contain large spills.	GTPL and contractor	Complete	Compliant		GTPL has prepared Soil and Water Management Plans for Stage A - Network (west/east) and Stage AB WRP that outline management measures and procedures relating to spills. No spill incidents were recorded during the reporting period. This will be done as part of the baseline monitoring for WMP. Letters inviting nearby property owners to participate in baseline monitoring were issued late 2013, and a site visit to two interested property owners was undertaken in December 2013. One was already a known bore. For the next monitoring event, samples from two private bores will be taken where possible. GTPL has prepared Soil and Water Management Plans for Stage A - Network (west/east) and Stage AB WRP that outline management measures and instructions around refilling. No refuelling spills were recorded during the reporting period.	
G3	Monitor groundwater quality to minimise adverse impacts.	Develop a groundwater monitoring program for the Project in consultation with relevant stakeholders. This program will address the following: <ul style="list-style-type: none">The salt levels in groundwater will be regularly monitored during and after Stage 1 of the Project.	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. GTPL has prepared a Groundwater Monitoring Program as part of the Water Management Plan in accordance with this SoC and in consultation with relevant stakeholders - refer attached correspondence and Appendix B of the WMP.	Agency comments on WMP
		<ul style="list-style-type: none">Groundwater samples will be collected from both the shallow and regional aquifers, and soil conductivity (that is, salt) mapping will be carried out where possible in areas of inferred impact.The monitoring of salt levels in the receiving waters will be indicative of the effectiveness of the stormwater system (refer below).						
G4	Minimise impact on drainage.	Develop the layout of infrastructure to reduce the impact on natural surface and subsoil drainage.	GTPL	Open	Compliant		The WRP, BWPS, SPS1 and interim reservoir sites have been designed to minimise earthworks so that the impact natural surface level is minimised. This will in turn minimise the impact on subsoil drainage.	
G5	Minimise the potential for groundwater mounding.	Construct in accordance with the approved materials and provisions of water supply code (WSA) 03-2002 to minimise leakage from water cycle infrastructure.	Contractor	Open	Compliant		The WRP, BWPS, SPS1 and interim reservoir sites have been designed in accordance with the Water Supply Code.	
G6	Minimise the potential for waterlogging.	The risks associated with waterlogging will be considered and accommodated through the design of the drainage system. Irrigation systems will be designed and scheduled to avoid overwatering.	GTPL	Open	Compliant		This commitment is being met through the design of the reticulation network in the subdivision in addition to the IWC infrastructure. Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP and relates more to the subdivision works where green space is to be irrigated during the long term. An Irrigation Management Plan for communal green space areas that will be irrigated with recycled water has been prepared as part of the Water Management Plan to meet the requirements of this commitment.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
G7	Minimise salinity impacts on soil and plant growth.	Soil monitoring in low-lying areas, where salt is likely to accumulate, will be undertaken. If salt levels were shown to be increasing, engineered drainage structures to nearby creek lines will be constructed. As a preventative measure, to avoid future bare soil patches and erosion, salt-tolerant landscaping will be used in low-lying areas.	GTPL	Open	N/A Compliant		Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP. GTPL has prepared a Water Management Plan that addresses soil monitoring. Soil monitoring will be undertaken prior to commencement of operation of the WRP and once subdivision works have been completed in NH1A. A Landscape Management Plan for Stage A - Network has been prepared with consideration for salt-tolerant landscaping. The Part 4 subdivision works have also had regard for this SoC and salt tolerant plants have also been included in the township.	
G8	Further investigate the groundwater environment, potential changes to recharge, and likelihood of long-term impacts.	Undertake the groundwater monitoring program as outlined in Table 12 of this report.	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. GTPL has prepared a Groundwater Monitoring Program in accordance with this commitment (refer to Appendix B of the Water Management Plan) to better understand the existing groundwater conditions. Baseline monitoring commenced in September 2013.	
H1	Avoid and/or minimise impacts on indigenous heritage.	Generally, indigenous heritage on the site will be managed in accordance with Appendix G of the EA, including the four identified indigenous heritage sites. The avoidance, relocation or disturbance of any Aboriginal heritage sites and PADs will be in accordance with relevant guidelines and permits. An archaeologist and representatives of the local Aboriginal community will conduct any relocation works.	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Heritage Management Plans. There was one heritage incident for Stage A - Network (east) recorded during the reporting period that related to the removal of temporary fencing installed to protect a heritage item during construction on 1 July 2013. However no impacts to a heritage item occurred as a result and as such it is considered that GTPL is compliant with this commitment. Refer also to CoA C4. A Heritage Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
H2	Protect unknown indigenous heritage.	Should any unknown indigenous heritage items be located during the proposed works by the site environmental officer or any other construction staff, all work will cease in the vicinity of the find until specialist indigenous heritage advice is received.	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Heritage Management Plans. Refer also to Attachment 2 (Unexpected Heritage Finds Procedure). No unexpected finds occurred during the reporting period. A Heritage Management Plan for Stage AB WRP has also been prepared and includes mitigation measures to address this requirement, (including an Unexpected Heritage Finds Procedure).	
HH1	Ensure recycled water meets all relevant guidelines.	Recycled water will meet the requirements for non-potable domestic use as defined in the <i>Australian Guidelines for Water Recycling: Managing Health and Environmental Risks</i> (NRMCC, EPHC & AHMC, 2006). Recycled water will be appropriately planned and industry accepted management systems put in place to assure appropriate product quality.	GTPL and QCC	N/A	N/A	N/A	Condition not applicable to construction of Stage A - Network (west/east) or operation of Stage A - Network, as both do not involve the construction/operation of the WRP (and hence supply of recycled water to the township). QCC has prepared Recycled Water Quality Management Plan as part of their application to NSW Office of Water under Section 60 of the <i>Local Government Act 1993</i> to construct the WRP, which addresses the requirements of this commitment.	
HH2		A Recycled Water Risk Management Plan (RWRMP) will be prepared based on the risk management framework outlined in <i>Australian National Guidelines for Water Recycling – Managing Health and Environmental Risks</i> (2006). This RWRMP will be a living document that will be refined throughout operation of the recycled water scheme. It will involve: <ul style="list-style-type: none">Developing the RWRMP through hazard identification (for the operation of the recycled water system and use of recycled water).Identifying the significant human and environmental health risks.Conducting validation, operational and verification monitoring to determine the success of the following respective components of the scheme: the risk management system, preventative measures, and the achievement of safe and sustainable water recycling.Completing the RWRMP, based on the monitoring results.	GTPL and QCC	N/A	N/A	N/A	Condition not applicable to construction of Stage A - Network (west/east) or operation of Stage A - Network, as both do not involve the construction/operation of the WRP (and hence supply of recycled water to the township). QCC has prepared Recycled Water Quality Management Plan as part of their application to NSW Office of Water under Section 60 of the <i>Local Government Act 1993</i> to construct the WRP, which addresses the requirements of this commitment.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
HH3	Reduce risks associated with exposure to recycled water.	<p>The Proponent will apply the following risk management practices to limit exposures to recycled water:</p> <ul style="list-style-type: none"> • Installation regulations and codes of practice that include systematic processes to reduce the probability of cross-connections. • Materials codes and regulations that easily discriminate drinking and recycled water plumbing. • Regulations that limit the legal installation and modification of plumbing systems to licensed individuals. • Education on recycled water use and the need to avoid creating cross-connections. • Installation of backflow prevention. • Operational checking (that is, testing of recycled effluent quality following treatment) and connection auditing. • Continue to liaise with relevant stakeholders to ensure awareness and understanding of the Project (including discharges of excess recycled water to the environment) and to address arising issues. 	GTPL and QCC	N/A	N/A	N/A	<p>Condition not applicable to construction of Stage A - Network (west/east) or operation of Stage A - Network, as both do not involve the construction/operation of the WRP (and hence supply of recycled water to the township).</p> <p>QCC has prepared Recycled Water Quality Management Plan as part of their application to NSW Office of Water under Section 60 of the <i>Local Government Act 1993</i> to construct the WRP, which addresses the requirements of this commitment.</p>	
N1	Minimise the noise impact associated with construction.	<p>Construction noise and vibration management strategies will be outlined in the CEMP. Measures will include the overall construction times (refer to C2) as well as the following:</p> <ul style="list-style-type: none"> • Construction noise goals. • Liaising with community to advise on likely timing and duration of noisy activities. • Procedures for resolving complaints received from residents and landowners and dealing with exceedances (including the appointment of a liaison person to maintain relationships between the community and the construction contractors in accordance with AS 2436:1981 <i>Guide to noise control on construction, maintenance and demolition sites</i>). • Using noise abatement measures (physical and managerial) where reasonable and feasible. • Procedures for liaising with the relevant agencies to discuss the need to construct outside of regular hours, for specific cases. 	GTPL	Complete	Compliant	<p>18-Oct-12</p> <p>05-Dec-12</p> <p>11-Dec-13</p>	<p>GTPL has prepared a Stage A - Network (west) Noise and Vibration Management Plan that details measures to manage noise and vibration impacts in accordance with this commitment. No noise complaints were received during the reporting period.</p> <p>GTPL has prepared a Stage A - Network (east) Noise and Vibration Management Plan that details measures to manage noise and vibration impacts in accordance with this commitment. No noise complaints were received during the reporting period.</p> <p>GTPL has prepared a Stage AB WRP Noise and Vibration Management Plan that details measures to manage noise and vibration impacts in accordance with this commitment. Construction had yet to commence on the WRP during the reporting period.</p>	
N1A	Assess the potential for vibration impacts should blasting be required.	Should blasting at the WRP or SPS sites be necessary based on geotechnical information and construction methodology, a construction vibration assessment will be undertaken in accordance with <i>Assessing Vibration: A Technical Guideline</i> (DECC, 2006) to determine any additional management measures required for blasting activities.	Contractor	Open	Compliant		No blasting was undertaken during the reporting period, however Noise and Vibration Management Plans and Blast Management Plans are in place for both Stage A - Network (west/east) works that considered vibration impacts.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
N2	Meet noise requirements near the WRP site boundary during operations.	The acoustic treatments specified for the WRP components, as outlined in Appendix J, will be implemented and then reviewed for effectiveness following noise measurement verification.	GTPL	N/A	N/A	N/A	Condition not applicable to construction of Stage A - Network (west/east) or operation of Stage A - Network. Noise attenuation will be considered as part of the detailed design for the Stage AB WRP.	
NH1	Avoid and/or minimise impacts on non-indigenous heritage.	Generally, non-indigenous heritage on the site will be managed in accordance with Appendix G of the EA. Construction and maintenance activities will be managed to avoid structural damage on heritage items as a result of vibration. Construction activities will be excluded from the identified heritage sites. However, if impacts are unavoidable then a further heritage assessment of the impacted site(s) will be conducted.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Heritage Management Plans. There were no heritage incidents to non-Indigenous heritage items recorded during the reporting period. A Heritage Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
NH2	Continue to investigate heritage values of site GH14 (refer to Section 7.3 of Appendix G of the EA).	Investigation into the value of site GH14 is continuing. The results of this study will inform the approach to mitigation of impacts to non-indigenous heritage.	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP, or the operation of Stage A - Network as work will not impact on site GH14. GH14 is located in the subdivision works for the township and the management of this heritage item is being managed under the subdivision works program and the Part 4 (EP&A Act) approval. GTPL has completed excavation works at this site, carried out under a S146 permit under the NSW <i>Heritage Act 1977</i> and the item is currently stored in a container. The structure will be re-built when the subdivision works are completed.	
NH3	Protect unknown non-indigenous heritage items.	If any material of potential archaeological significance is unearthed, work will cease in the vicinity of the find until specialist heritage advice has been obtained. The NSW Heritage Council will be notified of the discovery of any relics.	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Heritage Management Plans. No unexpected finds occurred during the reporting period. A Heritage Management Plan has also been prepared for Stage AB WRP and includes mitigation measures to address this requirement.	
OP1	Ensure comprehensive monitoring of operation of the water cycle.	Establishment and location details for monitoring sites will be in accordance with WQ4. Results of all monitoring programs that form part of these Statement of Commitments will be considered in terms of overall environmental impact on a regular basis, including: <ul style="list-style-type: none"> The trade-off between potable water savings, reduction in stormwater discharges and increased recycled water Relative impacts of excess recycled water discharges compared to impacts on soil and groundwater from recycled water usage The timeframe for relative comparisons of impacts of components of the water cycle will be determined in consultation with the relevant government agencies. The ability to feedback results for further stages of Googong township. 	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. GTPL has prepared a Water Management Plant to meet this condition (refer CoA D8).	
OP2	Ensure comprehensive monitoring of operation of the water cycle.	Telemetry will be installed on all major water cycle infrastructure to gather operational data.	GTPL	Open	Compliant		Telemetry has been installed at the BWPS, interim reservoirs and SPS1 during construction. GTPL has prepared an OEMP for Stage A - Network that outlines requirements to obtain operational data from the telemetry which will help to inform design for future stages.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
OP3	Adaptive management	Management plans will be reviewed with consideration of the outcomes of monitoring programs: <ul style="list-style-type: none"> Additional management and mitigation measures will be implemented, should monitoring identify that the water cycle system is operating outside of modelled or expected parameters. 	GTPL	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP. GTPL has prepared an OEMP for Stage A - Network and WMP that includes information about the review of management plans and adaptive management. Note that the operation of Stage A - Network does not involve the discharge of water to the environment. Future OEMPs will consider in more detail the additional mitigation measures to address when the water cycle infrastructure is operating outside the modelled or expected parameters.	
R1	Manage the operational risks associated with storage and delivery of chemicals.	Measures typical of facilities of the nature and size of the Project will include: <ul style="list-style-type: none"> Storing relevant chemicals below threshold quantity levels. Undertaking activities in accordance with relevant MSDS's. 	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Hazard, Risk and Safety Management Plans. An observation of concern was made during the independent audit on 19 November for Stage A - Network (east) as some of the Safety Data Sheets were out of date. These were updated by Guideline following the audit. No other incidents were recorded during the reporting period. A Hazard, Risk and Safety Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
		<ul style="list-style-type: none"> Installing bunded areas for the storage and delivery of chemicals in accordance with AS 3780:2008 <i>The storage and handling of corrosive substances</i> and the relevant MSDS's. Developing and implementing appropriate procedures for delivery, handling and accidental spills of chemicals. 						
R2	Manage risks in emergency and/or maintenance situations at the key infrastructure.	The OEMP and RWRMP will outline the management of emergency situations for all key water cycle infrastructure. For emergency or maintenance events associated with the WRP, the following will be implemented/installed, and will include measures such as: <ul style="list-style-type: none"> Telemetry at all key infrastructure (e.g. SCADA). An alarm system. Backup procedures should the power to infrastructure be interrupted. First flush tank at the WRP and wet well emergency storage at the SPS's. Overflows at the WRP and the SPS's. 	GTPL, QCC and ACTEW	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP. However the detailed design of the WRP will consider emergency infrastructure requirements. GTPL has prepared an OEMP for Stage A - Network that includes information about emergency situations as required by this condition (telemetry, alarms, and back up power supply - n.b the storage at SPS1 is for ultimate development and the expected volumes in SPS1 during the operation of Stage A - Network prior to commissioning at the WRP would be lower so that not all the emergency storage or emergency overflow would need to be utilised). In addition, QCC has prepared Recycled Water Quality Management Plan as part of their application to NSW Office of Water under Section 60 of the <i>Local Government Act 1993</i> to construct the WRP, which helps to address the requirements of this commitment.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
S1	Ensure proper management of soils.	Soil and water management plans will be developed and implemented for the construction phase, via the CEMP, in accordance with <i>Managing urban stormwater: soils and construction, Volume 1</i> (the 'Blue book'). Soil types will be identified and delineated within the study area. Soil management measures will be developed according to soil type and be documented in the CEMP.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Soil and Water Management Plan. A Soil and Water Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement. The SWMPs have been developed in accordance with this commitment.	
S2	Prevent soil erosion and minimise loss of topsoil.	The CEMP will detail erosion and sedimentation control measures, to maintain surface and soil stability at all times during cut and fill excavation activities (also necessary to ensure site safety). Graded soil will be stockpiled separately so that local soils can be recovered for respreading. During restoration and cleanup, the following will be applied in relation to stabilisation of soils: <ul style="list-style-type: none"> • Reprofilling of the site to achieve soil stability and congruity with the surrounding landscape. This will be done in consideration of the landscape and open space strategy (LOSS) for the Googong township. • Reseeding and the use of geotextile materials as required. 	GTPL and contractor	Complete	Compliant	18-Oct-12	GTPL has prepared a Stage A - Network (west) Soil and Water Management Plan that outlines the management measures for erosion and sedimentation control in accordance with this commitment.	
						05-Dec-12	GTPL has prepared a Stage A - Network (east) Soil and Water Management Plan that outlines the management measures for erosion and sedimentation control in accordance with this commitment.	
						11-Dec-13	GTPL has prepared a Stage AB WRP Soil and Water Management Plan that outlines the management measures for erosion and sedimentation control in accordance with this commitment.	
		<ul style="list-style-type: none"> • Backfilling of trenches in layers with compaction. • Management and exclusion of site access to assist with site recovery. 						
S3	Prevent and manage spills.	To prevent and manage spills, the proponent will: <ul style="list-style-type: none"> • Implement chemical transport, storage, handling and disposal procedures, in accordance with requirements for dangerous goods, of environmental legislation and industry standards. • Ensure spill response procedures and equipment for containment and recovery are available on site. • Conduct workforce training on the transport, storage, handling and disposal procedures relating to chemicals. 	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west) Soil and Water Management Plans. There were no spill incidents recorded during the reporting period. A Soil and Water Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
S4	Manage potential and/or real soil contamination on site.	To manage soil contamination, the proponent will: <ul style="list-style-type: none"> • Manage contaminated soil disposal or removal from site in accordance with OEH <i>Waste Classification Guidelines</i>. 	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Soil and Water Management Plans. No contamination issues were recorded during the reporting period. A Soil and Water Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
							No contaminated waste/spoil was identified during the reporting period.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
		<ul style="list-style-type: none"> Conduct further investigations at the newly identified area of concern (AEC – identified as Site 3 in Section 9.3.5 of the EA) prior to construction. An OEH accredited site auditor will provide advice on the need for further investigations at AEC3, if it is to be disturbed by the Project. 		Complete	Compliant	09-Aug-12	GTPL has investigated the presence and extent of potential soil contamination for Stage A - Network and Stage AB WRP. A site survey was carried out by Geotechnique on 19 and 20 July 2012. No sites of potential contamination were identified.	Geotechnique report
		<ul style="list-style-type: none"> Develop a sampling strategy for AEC2 (shown in Section 9.3.5 of the EA) as soon as the existing uses at the site cease, in consultation with a OEH accredited site auditor. 		N/A	N/A	N/A	The contamination assessment found that given the AEC2 was situated away from the Stage A - Network and Stage AB WRP sites, such that a desktop study and walkover / site inspection of the site was sufficient due diligence.	Geotechnique report
		If potential or actual contamination is found during earthworks, stop all work in the affected area until a suitably qualified person has inspected the site, the hazard has been assessed and appropriate action has been taken (including delineating areas of concern as required until earthworks can resume safely).		Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Soil and Water Management Plans. No contamination issues were recorded during the reporting period.</p> <p>A Soil and Water Management Plan has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.</p>	
S5	Ensure minimal impact on soil salinity and groundwater quality.	<p>Ensure that appropriate materials are used to mitigate against the corrosive impacts of high salinity.</p> <p>Design, where possible, the salt sensitive urban stormwater drainage system to direct potential saline runoff to a water body that is able to assimilate the expected salt load being applied to the landscape, without adverse impacts on aquatic and riparian ecosystems. Place and design built structures in consideration of existing and potential soil salinity levels.</p>	GTPL	N/A	N/A	N/A	<p>Condition not applicable to construction of Stage A - Network (west/east) or operation of Stage A - Network.</p> <p>This condition will be met during detailed design and construction phases of Stage AB WRP.</p> <p>Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP.</p> <p>This condition will be met during detailed design phase for the stormwater ponds as part of the Part 4 subdivision works.</p>	
		<p>The proposed WRP should be designed to minimise the need for additions of chemicals for phosphorus removal, to minimise salt loading. The Proponent will explore options to switch off the phosphorus removal process during peak irrigation demand periods in accordance with Statement of Commitment OP1.</p> <p>Early stages of Googong township will be used as a trial to better understand the movement of salt in the landscape. It will involve the installation of carefully located piezometers and the monitoring of results, as well as monitoring the effectiveness of pre-emptive measures such as any subsurface drainage system. The results will be used to improve strategies for ensuing stages.</p> <p>Recycled water users will be informed of the specific risks associated with irrigation with recycled water, in the context of developing a complete awareness of the Project and its environmental trade-offs. This will include:</p> <ul style="list-style-type: none"> Education on salinity impacts on soil and plant damage and regrowth. Encouragement to grow salt-tolerant species, particularly in areas considered to be of high risk. <p>Householders will be educated on the benefits of using detergents that are low in phosphorus, sodium and salt – in terms of the impact on recycled water quality. This will form part of the broad community education program.</p>					<p>Condition not applicable to construction of Stage A - Network (west/east).</p> <p>This condition will be met during detailed design phase for the WRP and implementation of the Water Management Plan (as per CoA D8) that has been prepared but will be updated prior to operation of the Water Recycling Plant.</p> <p>Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP.</p> <p>GTPL has prepared an Irrigation Management Plan, as part of the Water Management Plan to address this condition. Refer to Appendix E of the WMP. Soil monitoring will be undertaken prior to commencement of operation of the Water Recycling Plant and once subdivision works have been completed in NH1A.</p> <p>Condition not applicable to construction of Stage A - Network (west/east), Stage AB WRP or operation of Stage A - Network as the WRP will not be operational.</p> <p>GTPL has prepared a Community Education Strategy for Stage 1 of the Googong Township Integrated Water Cycle Project. In addition QCC has prepared a Recycled Water Quality Management Plan that also details education and consultation strategies. GTPL and QCC will progress actions as the IWC Project moves into operation phase.</p>	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
T1	Minimise disturbance to local traffic and amenity during construction.	A traffic management plan will be prepared prior to the commencement of construction. It will detail traffic arrangements for the construction phase of the Project. This will include:	GTPL and contractor	Complete	Compliant	18-Oct-12 05-Dec-12	GTPL has prepared a Stage A - Network (west) Traffic Management Protocol in accordance with this commitment and in consultation with the following agencies: QCC, Palerang Council, and RMS. GTPL has prepared a Stage A - Network (east) Traffic Management Protocol in accordance with this commitment and in consultation with the following agencies: QCC, Palerang Council, and RMS.	
						11-Dec-13	GTPL has prepared a Stage AB WRP Traffic Management Protocol in accordance with this commitment and in consultation with the following agencies: QCC, EPA and RMS.	
		<ul style="list-style-type: none"> The use of standard mitigation and management controls. Planning of vehicle use to maximise efficiency and reduce vehicle trips. An education program for construction personnel in relation to local traffic arrangements (as per the plan) and local conditions (such as the intersection of Googong Dam Road and Old Cooma Road). Access to properties and provisions for temporary access. <p>A traffic control contractor will be engaged to implement the traffic management plan (such as partial road closures), where necessary specialist advice is required.</p>						
T2	Manage traffic, transportation and access with local authorities.	Traffic, transportation and access will be managed in consultation with relevant stakeholders, including QCC and the RTA, including impact mitigation and management measures to address partial road closures, access to properties and provisions for temporary access and re-instatement.	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Traffic Management Protocol. Two Section 138 Certificates were issued by QCC for works on Googong Dam Road under the <i>Roads Act 1993</i> . A Traffic Management Protocol has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	Section 138 certificates
T3	Minimise the impact of transportation.	Any oversized or overweight loads will be transported in accordance with RTA guidelines and requirements.	Contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Traffic Management Plan. A Traffic Management Protocol has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
T4	Minimise impact of traffic and access on stakeholders and the local community.	Councils, property owners and local community members will be informed of any potential loss of or disruption to access to properties, roads and/or pathways. Appropriate temporary measures to either provide alternative access or to reinstate access at the end of each workday will be negotiated with relevant parties.	GTPL and contractor	Open	Compliant		Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through the mitigation measures detailed in the Stage A - Network (west/east) Traffic Management Protocol. A Traffic Management Protocol has also been prepared for Stage AB WRP that includes mitigation measures to address this requirement.	
T5	Manage operational traffic, transportation and access to minimise impacts on local conditions.	A Traffic management plan will be prepared for the operation and maintenance of key water cycle infrastructure, which will include: <ul style="list-style-type: none"> Standard management and mitigation measures for managing vehicle movements at water cycle infrastructure sites. Timing of truck movements for deliveries and disposal, and parking arrangements. 	GTPL and contractor	Open	Compliant		Condition not applicable to construction of Stage A - Network (west/east) or Stage AB WRP. A Traffic Management Plan for tankering operations during operation of Stage A - Network is included in the OEMP (refer Appendix E).	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
V1	Minimise visual impact by maintaining existing vegetation where practical.	At relevant sites, existing vegetation will be maintained where practical and where appropriate. Additional vegetation will be planted along site boundaries to obscure views of infrastructure from sensitive receivers.	GTPL and contractor	Open	Compliant		<p>Compliance with this condition is ongoing throughout Stage A - Network (west/east) works and has been managed through mitigation measures detailed in the Stage A - Network (west/east) Flora and Fauna Management Plans.</p> <p>A Flora and Fauna Management Plan has also been prepared for the Stage AB WRP that includes mitigation measures to address this requirement. There were no recorded incidents of excessive vegetation clearing during the reporting period.</p> <p>Visual planting has been considered as part of the Landscape Management Plan for Stage A - Network and replanting will continue into the next reporting period at the end of the construction phase.</p> <p>A Landscape Management Plan is also being prepared for the Stage AB WRP to meet the requirements of this commitment.</p>	
V2	Minimise the visual impact of the reservoirs and access road (located on Hill 800).	<p>Visual impact of the reservoirs will be minimised through painting the structures a colour that will be chosen as the most compatible and/or appropriate with the surrounding environment and proposed Googong township.</p> <p>The landscaping approach for the reservoirs and associated access road will ensure minimal visual impact by:</p> <ul style="list-style-type: none"> Achieving the most appropriate finished landform profile of the top of the hill that integrates the reservoirs. 	GTPL	N/A	N/A	N/A	Condition not applicable to Stage 1 (ie Stage A and B). This condition will be met during detailed design phase of the permanent reservoirs (Stage C/D).	
		<ul style="list-style-type: none"> Detailing siting and design of any elements over and above the reservoirs to minimise visibility (e.g. plant equipment, fencing, signage and lighting). Ensure the access road alignment is a careful balance of limited visible road profile and minimised cutting/embankment visibility where following contours. Considering the location and extent of tree groups to best mitigate visual impacts. Considering soil and microclimate factors and amelioration to ensure healthy and rapid tree growth. 						
W1	Practice responsible resource management during construction.	The CEMP will address the principles of the resource management hierarchy (avoidance, resource recovery and disposal in that order) and disposal will be to a licensed waste facility. The CEMP will include the following:	GTPL and contractor	Complete	Compliant	18-Oct-12	GTPL has prepared a Stage A - Network (west) Waste and Resource Management Plan that outlines the principles of the resource management hierarchy. No waste management issues were recorded during the reporting period.	
		05-Dec-12				GTPL has prepared a Stage A - Network (east) Waste and Resource Management Plan that outlines the principles of the resource management hierarchy. No waste management issues were recorded during the reporting period.		
		11-Dec-13				GTPL has prepared a Stage AB WRP Waste and Resource Management Plan that outlines the principles of the resource management hierarchy. No waste management issues were recorded during the reporting period.		
		<ul style="list-style-type: none"> Procedures to classify waste types in accordance with the <i>Waste Classification Guidelines</i> and NSW legislative requirements. Resource recovery and re-use strategies for each waste type. Details of treatment and storage of on-site waste. Procedures and disposal arrangements for relevant materials. Reporting and recording requirements for all waste movements, allowing determination of recycling and re-use levels achieved. 						

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
W2	Practice responsible resource management during operation.	Operational management of wastes will be incorporated into the OEMP for the key sites. Some inclusions are procedures for: <ul style="list-style-type: none"> The collection and transportation of grit and screenings from the WRP to an appropriately licensed facility. Treatment and handling of biosolids, suitable for use in agriculture, forestry, soil and site rehabilitation (Grade B), in accordance with OEH's <i>Environmental Guidelines on the Use and Disposal of Biosolids Products</i> (2007). Management and monitoring of the discharge of treated effluent (recycled water) during commissioning and verification phases of the WRP operation. Waste management for putrescible and recyclable wastes generated from the WRP and other water cycle infrastructure. Procedures for the collection and dewatering of any solid matter removed through maintenance activities of water cycle infrastructure, and transportation and disposal off site. Vehicle routes, and the timing of trips, associated with waste management, in consideration of the traffic management plan. 	GTPL	N/A	N/A	N/A	Condition not applicable to construction of Stage A - Network (east/west) and Stage AB WRP. GTPL has prepared an OEMP for Stage A - Network that includes mitigation measures to meet the requirements of this commitment. In addition a Traffic Management Plan (refer Appendix E of the OEMP for Stage A - Network) has also been prepared.	
WQ1	Implement water quality and hydrology management procedures.	To reduce risks associated with water quality, soil and water management plans will be developed and implemented for the construction phase, via the CEMP, in accordance with <i>Managing urban stormwater: soils and construction, Volume 1</i> (the Blue book).	GTPL and contractor	Complete	Compliant	18-Oct-12 05-Dec-12 11-Dec-13	GTPL has prepared a Stage A - Network (west) Soil and Water Management Plan that outlines the management measures for erosion and sedimentation control in accordance with this commitment. GTPL has prepared a Stage A - Network (east) Soil and Water Management Plan that outlines the management measures for erosion and sedimentation control in accordance with this commitment. GTPL has prepared a Stage AB WRP Soil and Water Management Plan that outlines the management measures for erosion and sedimentation control in accordance with this commitment.	
WQ2	Minimise the risk of surface water contamination.	A spill management and response procedures will be developed in the CEMP for the construction phase of the Project. These will specify that: <ul style="list-style-type: none"> Any fuels and chemicals will be stored to meet relevant standards in banded or contained areas and a spill kit will be provided at all locations where fuels and/or chemicals are used. Fuel and chemical storage sites will not be located in the vicinity of any permanent and/or flowing waterway. The maintenance or refuelling of equipment will not be undertaken within the vicinity (within 150m) of any waterway. 	GTPL and contractor	Complete	Compliant	18-Oct-12 05-Dec-12 11-Dec-13	GTPL has prepared a Stage A - Network (west) Soil and Water Management Plan that outlines the spill management response in accordance with this commitment. GTPL has prepared a Stage A - Network (east) Soil and Water Management Plan that outlines the spill management response in accordance with this commitment. GTPL has prepared a Stage AB WRP Soil and Water Management Plan that outlines the management measures for erosion and sedimentation control in accordance with this commitment.	

SoC	Objective	Commitment	Responsibility	Status	Compliance with condition during reporting period	Completion Date	Comment	Verification
WQ3	Ensure bank stabilisation in construction sites.	<p>The CEMP will incorporate measures to ensure that creek banks are stabilised during the construction phase, such as:</p> <ul style="list-style-type: none"> Stabilising where required by establishing rocks, sandbags/ matting to prevent scouring, ensuring that they are placed to conform as far as possible with existing contours. Respreading topsoil over the area from where it was removed. 	GTPL and contractor	Complete	Compliant	<p>18-Oct-12</p> <p>05-Dec-12</p>	<p>GTPL has prepared a Stage A - Network (west) Soil and Water Management Plan that outlines the measures to stabilise creek banks.</p> <p>GTPL has prepared a Stage A - Network (east) Soil and Water Management Plan that outlines the measures to stabilise creek banks.</p>	
WQ4	Monitor impacts on waterways.	<p>A monitoring program to assess the potential impacts of the Project on the Queanbeyan River (including water quality, flow, fish migration, macrophytes and macro invertebrate communities) will be undertaken.</p> <ul style="list-style-type: none"> Details of the monitoring program will be determined in consultation with relevant government authorities/stakeholders (including the OEH, DPI and, potentially, ACTEW Corporation). Such consultation will ensure the sharing of available data for the Queanbeyan River for comparative and impact assessment purposes. 	GTPL	Open	Compliant		<p>Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP.</p> <p>GTPL has prepared a Surface Water and Aquatic Ecology Monitoring Program as part of the Water Management Plan (refer CoA D8) to address this commitment.</p> <p>Condition not applicable to construction of Stage A - Network (west/east) and Stage AB WRP.</p> <p>The WMP was developed in consultation with the stakeholders listed in this condition - refer attached correspondence.</p>	Agency comments on WMP
		<ul style="list-style-type: none"> A new monitoring site within the Queanbeyan River is proposed to measure water quality and aquatic ecology impacts over the medium term. This site will be located near the confluence of Googong Creek and Queanbeyan River (and will be sited to enable comparison with data collected from upstream and downstream sites). Monitoring will commence approximately 12 months prior to commissioning the water recycling plant. 					<p>Surface/groundwater monitoring commenced in September 2013 to allow for at least 12 months of monitoring prior to operation of the WRP. The WMP will be updated with the monitoring results, issued to agencies for review and submitted to DP&I for approval, prior to operation of the WRP. In total there are nine monitoring sites including near the confluence of Googong Creek and Queanbeyan River.</p> <p>Monitoring commenced in September 2013 which is more than 12 months from the scheduled commissioning date where recycled water would be discharged.</p>	
WQ5		The operation environmental management plan (OEMP) will outline erosion and sediment control measures to protect buffer and riparian vegetation zones, in general accordance with Statement of Commitment WQ3.	GTPL	N/A	N/A	N/A	Condition not applicable to the operation of Stage A - Network as it does not include discharge of water to the environment and so there would be no additional risks to downstream vegetation zones.	

Appendix 2

EPA Caution



Our reference: EF13/3959
Contact: Sharon Peters, (02) 6229 7002

Mr Craig Harris
Assistant Project Director
Googong Township Pty Limited
PO Box 1000
CIVIC SQUARE ACT 2608

2 December 2013

Dear Mr Harris

OFFICIAL CAUTION

Googong Township Integrated Water Cycle Project Environment Protection Licence 20188 Water Pollution Incident - 19 July 2013

I refer to an incident that occurred at Googong Township Pty Ltd's (GTPL) Integrated Water Cycle Project development at Googong NSW ("the premises") on 19 July 2013. GTPL is the holder of Environment Protection Licence No. 20188 ("EPL") issued under the *Protection of the Environment Operations Act 1997* ("POEO Act") in relation to the Integrated Water Cycle Project.

The Environment Protection Authority (EPA) received a complaint on 19 July 2013 where it was alleged that sediment laden water was leaving the premises and entering the Queanbeyan River causing water pollution ("the incident"). The EPA conducted an investigation into the incident, and I am writing to you to provide information on the outcome of that investigation.

Investigation

Upon receipt of the complaint, the EPA commenced an investigation into the incident, including conducting a site inspection on 19 July 2013. GTPL provided, after a request by the EPA, an incident report which was received on 5 August 2013.

It appears that a rain event on 19 July 2013 mobilised sediment laden water which by-passed and/or overwhelmed installed sediment controls at the premises. The data about the rainfall event indicates that it correlates to an Average Recurrence interval (ARI) of less than one year. In this instance it is expected erosion and sediment controls designed in accordance with the "Blue Book" (*Managing Urban Stormwater: Soils and Construction, Landcom 2008*) should have been sufficient to prevent an offsite discharge of polluted water.

The erosion and sediment controls were in place along Googong Dam Road from pipeline works which had recently been completed on the IWC Project. The sediment laden water was observed leaving the premises and flowing into Googong Creek and Montgomery Creek, which both lead to the Queanbeyan River.

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- 4 DEC 2013

Pollution of Waters

The EPA has determined that a breach of section 120 of the POEO Act occurred during the incident on 19 July 2013. Section 120 states:

120 Prohibition of pollution of waters

(1) *A person who pollutes any waters is guilty of an offence.*

Note. *An offence against subsection (1) committed by a corporation is an offence attracting special executive liability for a director or other person involved in the management of the corporation—see section 169.*

(2) *In this section:*

pollute waters includes cause or permit any waters to be polluted.

Failure to Notify a Pollution Incident

The EPA's investigation also identified that GTPL stated in its "Incident Report" that the incident was classified as a 'Category 1 Incident' as per its Construction Environmental Management Plan. An extract of GTPL's Construction Environmental Management Plan states:

7.1 Classification of environmental incidents

There are two categories of environmental incidents.

7.1.1 Category one

Category one incidents include:

- Unauthorised sediment discharge or fuel, oil or chemical spill leaving site where the pollution incident causes or threatens material harm to the environment or people (as per Part 5.7 of the NSW *Protection of the Environment Operations Act 1997* (POEO Act)).
- Unauthorised impact to threatened species and endangered ecological communities.
- Unauthorised impact to Aboriginal or non-Aboriginal heritage items, sites or relics.
- Carrying out of work without necessary approval/permit/licence.

7.1.2 Category two

Category two incidents include:

- Pollution incidents that can be cleaned up without material harm to the environment or people (as per Part 5.7 of the POEO Act).
- A non-conformance with the environmental management system does not result in a Category one incident.

Section 148 of the POEO Act requires, in the event of a pollution incident which threatens or causes material harm to the environment, immediate notification to the EPA and other agencies. The EPA received telephone notification of the incident on 25 July 2013 from Guideline ACT Pty Ltd and written notification from GTPL on the 26 July 2013. It is understood that Guideline ACT Pty Ltd is contracted to GTPL for the Googong IWC Project.

Given that GTPL classified this incident as a Category 1 incident, it appears that notification under section 148 of the POEO Act was required immediately. Notification six days after the incident is not immediate, and it appears a breach of section 148 has occurred.

Appropriate Action

The EPA can exercise its discretion in deciding what regulatory action to take in relation to alleged offences as guided by its *Prosecution Guidelines*. In this instance the EPA has elected not to take prosecution action but to issue GTPL with an Official Caution for the failure to notify the pollution incident on 19 July 2013 in accordance with Section 148, and for failing to comply with Section 120 of the POEO Act – pollute waters.

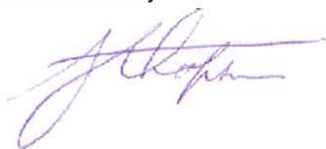
The decision not to take regulatory action is based upon the following factors:

- GTPL's full cooperation with the EPA's investigation;
- the prompt corrective actions and measures taken by GTPL to prevent a reoccurrence of this type of incident / offence at the premises; and
- The low level of environmental harm that could be expected to result; and
- No record of previous similar breaches.

The EPA reminds GTPL about the importance of compliance with NSW environmental legislation and your Environment Protection Licence conditions. Notification of pollution incidents can be made to the EPA Environment Line Service on Ph: 131 555 which operates 24 hours / 7 days.

Should you wish to discuss this matter further please contact me or Sharon Peters of this office on Ph: 6229 7002.

Yours sincerely



JULIAN THOMPSON
Unit Head – South East Region
Environment Protection Authority