

Our Ref: SO32-T00009

11 December 2024

Ben Harrison
Director Compliance
Planning and Assessment
NSW Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Harrison

Eurobodalla Southern Storage SSD 7089 – Independent Environmental Audit 3

Please find attached the Independent Environmental Audit report for the audit undertaken on the 31st July 2024 for the period from 15th November 2023 to 31st Jul 2024.

Please be advised that in consideration of the Audit Report provided by NGH Environmental and the identified non-compliances and recommended actions included within this report, Council proposes the following responses and actions.

Non-compliant requirement	Proposed Response/Action
A24 – Audit not undertaken within 6 months of previous audit.	Council has recently increased internal resources for the project through the engagement of an Environmental Engineer to assist the project team with administration duties related to Conditions of Consent compliance. This includes organising Independent Environmental Audits. The process of approval and procurement of auditor services for the fourth IEA has commenced.
B15 – Dirty water discharges not in compliance with Section 120 of the POEO Act.	The Contractor will continue to comply with the requirements of the CSWMP developed in close consultation with the NSW EPA, including sizing and location of sediment basins and management of and response to uncontrolled discharges due to significant wet weather.
B20, C3 and Appendix 2, Condition 1.2 – Inclusion of Emergency Response Procedures and Landscape Management Plan in the CEMP.	Noting that these conditions were identified as being compliant in previous Audits, the CEMP will be amended to include: <ul style="list-style-type: none"> - the Emergency Response Procedures already incorporated in the Safety Management Plan, as referenced by the CEMP, and - the Landscape Management Plan.

<p>C7 and C8 – Review of CEMP after submission of incident report.</p>	<p>It is noted that reviews of CEMP documentation undertaken post incident have not been appropriately documented in accordance with these Conditions. The recently appointed Environmental Engineer referenced above will be responsible for ensuring Council compliance with consent conditions, including those related to reporting and responding to incidents.</p>
<p>C15 – Making information and documents publicly available on Council’s website.</p>	<p>The recently appointed Environmental Engineer referenced above will be responsible for ensuring Council compliance with consent conditions, including implementation of recommended actions from this Audit report. Website to be updated to include:</p> <ul style="list-style-type: none"> - RAR from first, second and third audit. - Revised CEMP which will include the Landscape Management Plan.

If you have any queries, please don’t hesitate to contact me on 4474 1342.

Yours sincerely



Harvey Lane
Water & Sewer Project Engineer

cc Lloyd Eley-Smith – Team Leader, Transport and Water Assessments
 Katrina O’Reilly – Team Leader Compliance – Planning & Assessment
 Michael Wood – Senior Compliance Officer – Planning & Assessment

