

Final

# Googong Township Integrated Water Cycle Project Independent Environmental Audit

Prepared for

Googong Township Pty Ltd

May 2015



Ecology and Heritage Partners Pty Ltd

## ACKNOWLEDGEMENTS

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We thank the following people for their participation during the audit which included providing the project documentation that was requested and for explaining how these documents are managed and controlled.

- Matthew Lau – MIRVAC
- Katharine Bond – RPS
- Andre Kruize – JHPL
- Simba Kippaya – BMCA
- Michael Fields – Guideline ACT
- Aaron Wilson – BMCA
- Adam Perry – Guideline ACT
- John Hyam – ICON Water

## DOCUMENT CONTROL

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## GLOSSARY

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Acronym	Description
BMCA	Black Mountain Construction Assurance Pty Ltd
CAR	Corrective Action Request
CEMP	Construction Environmental Management Plan
CIP	Community Information Plan
DG	Director-General
GTPL	Googong Township Pty Ltd
Guideline ACT	Guideline (ACT) Pty Ltd
JHPL	John Holland Pty Ltd
MIRVAC	Mirvac Developments Pty Ltd
OoC	Observation of Concern
QCC	Queanbeyan City Council
RPS	RPS Australia Pty Ltd
WRMP	Waste and Resource Management Plan
WRP	Water Recycling Plant

## SUMMARY

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The intention of the audit was to review any outstanding matters from previous independent environmental audits, to check the compliance by GTPL of certain conditions listed in the project approval, to examine the currency of the relevant CEMPs, and to assess the presence and completeness of relevant documents and records.

During the audit, it was evident from the responses given that GTPL were effectively complying with the project approvals and the construction contractors namely JHPL and Guideline ACT were effectively implementing the CEMPs. However, the audit did uncover some aspects for which corrective actions will be required by JHPL and Guideline ACT. The audit did also discover several inconsistencies with project documentation that will need to be considered by GTPL, JHPL and Guideline ACT.

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## 1 INTRODUCTION

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In accordance with the administrative conditions listed under the project approval dated 24 November 2011 that were issued on behalf of the NSW Minister for Planning and Infrastructure for Stage 1 of the Googong Township Water Supply Project, a program of independent environmental audits is to be implemented as part of the compliance tracking program. The purpose of the audits are to track compliance with requirements of the approval during construction and operations of this project. The following contains the findings of the most recent independent environmental audit that was conducted on the project site between the 5 and 6 May 2015.

The audit, as with the previous independent environmental audits, was undertaken in a manner consistent with the AS/NZ ISO 19011:2003 – *Guidelines for Quality and/or Environmental Management Systems*, in that:

- a. An audit plan was developed and issued prior to the audit which identified the audit scope, the dates and places where the audit activities were to be conducted, together with the expected time and duration of the audit;
- b. The auditor, prior to the audit, considered information relevant to the audit scope in order to prepare for the audit;
- c. An opening statement was made by the auditor to the audit participants on the day of each audit thereby outlining how the audit would be undertaken;
- d. All persons in attendance during the audit were provided with an opportunity to ask questions during the audit proceedings; and
- e. During the audit, copies of documents were obtained as evidence and to validate particular audit findings.

Since the commencement of construction for Stage 1 of the Googong Township Water Supply Project, there have been four audits conducted as part of the independent environmental audit program. The timings of these previous audits are listed below.

- **28 October 2014:** Stage A – Network (east) / Stage AB – WRP
- **14 May 2014:** Stage A – Network (west) / Stage A – Network (east)
- **19 November 2013:** Stage A – Network (east)
- **4 June 2013:** Stage A – Network (west)

## 2 AUDIT OBJECTIVES

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Given that the audit is expected to be the last audit that will apply to the construction phase of Stage 1 of the Googong Township Water Supply Project, the following four objectives were applied.

1. To review that status of each CAR identified in previous independent environmental audits, along with any OoC to see if all have been addressed.
2. To check the compliance by GTPL of certain conditions listed in the project approvals and that are relevant to the present project situation.
3. To examine the currency of the relevant CEMPs and supporting plans.
4. To assess the presence and completeness of relevant documents and records including those relating to the following aspects:
  - a. Environmental inspections
  - b. Environmental non-compliance and corrective actions
  - c. Environmental complaints
  - d. Environmental incidents
  - e. Environmental training
  - f. Environmental monitoring and reporting



### **3 PREVIOUS AUDIT FINDINGS**

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According to previous independent environmental audit reports, the arrangement for rectifying any non-compliance identified during an audit relies on GTPL applying the correct procedure to verify the completion of each CAR and OoC. This process documents how GTPL and the construction contractors have addressed each CAR or OoC, and this is managed through the GTPL Compliance Tracking Program.

As part of this audit, a review was undertaken of the previous audit findings against those listed in the Googong Township IWC Project Non-Conformance and Environmental Incident Register. As a result of this review, it appears that all previous CARs and concerns that were identified had been recorded onto the register and all had been addressed. This audit therefore finds that there are no unresolved matters from previous independent environmental audits.

## 4 AUDIT FINDINGS

### 4.1 Googong Township

In accordance with the project approval for Stage 1 of the Googong Township Water Supply Project, which was issued under Section 75J of the *Environmental Planning and Assessment Act 1979*, there are several administrative conditions, specific environmental conditions, construction conditions and incident reporting conditions that must be met. As a consequence, this audit has checked compliance by GTPL of certain conditions listed in the project approval and that are relevant to this current phase of the project, and finds that no corrective actions are required by GTPL. However, during this audit a few observations were made where there is some concern regarding project documentation and these are detailed in the table below (Table 1).

**Table 1:** Concerns about Googong Township project documentation

OoC No.	Details
1	According to administrative condition number A14 which forms part of the project approval issued under Section 75J of the <i>Environmental Planning and Assessment Act 1979</i> , GTPL is required to have a CIP which shall be prepared in consultation with the QCC. When preparing for this audit, it was observed on the Googong compliance website that there was no information in the CIP to indicate that the CIP was prepared in consultation with the QCC. During this audit, no documentary evidence could be provided by GTPL to confirm that the CIP had been prepared in consultation with the QCC.
2	According to administrative condition number A14 which forms part of the project approval issued under Section 75J of the <i>Environmental Planning and Assessment Act 1979</i> , GTPL is required to have a CIP that is prepared to the satisfaction of the DG. During this audit, documentary evidence was provided by GTPL which confirmed that the DG was satisfied with the CIP. However, this correspondence from the DG is not referred in version 4.0 of the CIP which is currently published on the Googong compliance website.
3	During this audit, no documentary evidence could be provided by GTPL to show that the complaints register is structured so that it records, as a minimum, the information described in project approval administrative condition number A16 which forms part of the project approval issued under Section 75J of the <i>Environmental Planning and Assessment Act 1979</i> .
4	When preparing for this audit, it was observed on the Googong compliance website that the approval of the Googong Foreshores Interface Management Strategy had been given by the Australian Government's Environment Department in September 2014 which presumably meant that the implementation Committee would have been established a short time thereafter. During this audit, no documentary evidence could be provided by GTPL to show that a committee had been established to oversee the implementation of the Googong Foreshores Interface Management Strategy, which is a requirement of condition 3 of the approval issued under sections 130(1) and 133 of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> .

## 4.2 Stage AB – Water Recycling Plant

Section 8.4 of the CEMP for the Stage AB – WRP indicates that independent external audits will occur every six months. As a consequence, it was expected that JHPL would be prepared for this audit and its assessment of the presence and completeness of relevant documents and records. Overall, the audit found that most of the construction environmental management documents and records maintained by JHPL for Stage AB – WRP were present and complete. However, the audit did find that one corrective action is required as well as an observation made where there is a concern pertaining to one item of project documentation. This CAR and the OoC are detailed in the respective tables below (Table 2 and 3).

**Table 2:** Required action pertaining to Stage AB – WRP project documentation

CAR No.	Details
1	No documentary evidence could be provided by JHPL to confirm that mitigations measures WR5, WR8 and WR10 as outlined in the WRMP for Stage AB – WRP were being implemented. It is therefore recommended that JHPL undertake action to correct (update) project records so that it can be verified that: any waste that was disposed off site actually went to a facility that was licensed to accept the waste; any contaminated material such as used spill kit items and dirt soaked in oil or fuel from the site actually went to a licensed waste disposal facility; and any sewage removed from the site facilities was actually sent to a local sewage treatment plant and that the removal contractor was licensed.

**Table 3:** Concerns about Stage AB – WRP project documentation

OoC No.	Details
1	Despite all of the events been considered closed by JHPL, during the audit it was determined that none of the environmental incidents listed on JHPL's event tracking system (known as the JHET system) had been 'signed-off'.

## 4.3 Stage B – Network

Section 8.4.2 of the CEMP for the Stage B – Network indicates that independent external audits will occur every six months. As a consequence, it was expected that Guideline ACT would be prepared for the audit and its assessment of the presence and completeness of relevant documents and records. Overall, the audit found that most of the construction environmental management documents and records maintained by Guideline ACT for Stage B – Network were present and complete, although the audit did find though that one corrective action is required. Three observations were also made where there is a concern about the project documentation. Each CAR and OoC are detailed in the respective tables below (Table 4 and 5).

**Table 4:** Required action pertaining to Stage B – Network project documentation

CAR No.	Details
1	During this audit, no documentary evidence could be provided by Guideline ACT to confirm that mitigations measures WR5, WR8 and WR10 as outlined in the WRMP for Stage B – Network were being implemented. It is therefore recommended that Guideline ACT undertake action to correct (update) project records so that it can be verified that: any waste that was disposed off site actually went to a facility that was licensed to accept the waste; any contaminated material such as used spill kit items and dirt soaked in oil or fuel from the site actually went to a licensed waste disposal facility; and any sewage removed from the site facilities was actually sent to a local sewage treatment plant and that the removal contractor was licensed.

**Table 5:** Concerns about Stage B – Network project documentation

OoC No.	Details
1	During this audit, it was observed that the Site Environment Weekly Checklists for much of the project period had not been adequately completed by Guideline ACT, in that most of the checklists held on site were not initialled or dated to indicate that the required action(s) had been completed.
2	During this audit, it was observed that the Environmental Control Plan Register held by Guideline ACT was not up-to-date.
3	During this audit, it was observed that the dewatering records held by Guideline ACT did not include the volume of water discharged.

#### 4.4 Stage A – Network (East)

Section 8.4 of the CEMP for the Stage A – Network (East) indicates that independent external audits will occur every six months. As a consequence, it was expected that Guideline ACT would be prepared for this audit and the assessment of the presence and completeness of relevant project documents and records. Overall, the audit found that most of the construction environmental management documents and records maintained by Guideline ACT for Stage A – Network (East) were present and complete, although the audit did find that two corrective actions are required. Two observations were also made where there is a concern about the project documentation. Each CAR and each OoC are detailed in the respective tables below (Table 6 and 7).

**Table 6:** Required action pertaining to Stage A – Network (East) project documentation

CAR No.	Details
1	During this audit, no documentary evidence could be provided by Guideline ACT to confirm that mitigation measures WR3 as outlined in the WRMP for Stage A – Network (East) was being implemented. It is therefore recommended that Guideline ACT undertake action to correct (update) project records so that it is known what spoil was collected for recycling or reuse, including the spoil amounts, date, time and location of disposal.
2	During this audit, no documentary evidence could be provided by Guideline ACT to confirm that mitigations measures WR4, WR7 and WR10 as outlined in the WRMP for Stage A – Network (East) were being implemented. It is therefore recommended that Guideline ACT undertake action to correct (update) project records so that it can be verified that: any waste that was disposed off site actually went to a facility that was licensed to accept the waste; any contaminated material such as used spill kit items and dirt soaked in oil or fuel from the site actually went to a licensed waste disposal facility; and any sewage removed from the site facilities was actually sent to a local sewage treatment plant and that the removal contractor was licensed.

**Table 7:** Concerns about Stage A – Network (East) project documentation

OoC No.	Details
1	During this audit, it was observed that the Non Conformance/Corrective Action Report prepared by Guideline ACT for the temporary spoil stockpile that covers a heritage site known as GWTP3 was closed and yet the issue concerning the relocation of the temporary spoil stockpile is yet to be finalised.
2	During this audit, it was observed that the Site Environment Weekly Checklists for much of the project period had not been adequately completed by Guideline ACT in that most the checklists held on site where not initialled or dated to indicate that the required action(s) had been completed.

## 5 AUDIT CONCLUSIONS

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In conclusion, it is noticeable from the audit that GTPL is committed to complying with the project approvals and both JHPL and Guideline ACT are committed to implementing their respective CEMPs. It is also clear from the well maintained project documentation that GTPL, JHPL and Guideline ACT were continually seeking to improve their environmental performance. Nonetheless, the audit finds that further improvements could be made by GTPL, JHPL and Guideline ACT to comply with the requirements of the project approvals during construction, and this is evident from the four corrective actions and ten project documentation concerns that have been detailed.

## APPENDIX – AUDIT PLAN

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This audit, to be conducted by Richard Sharp (the appointed Environmental Representative), will cover the Construction Environmental Management Plans and supporting plans together with all other documents and records including those relating to the following aspects:

- Environmental inspections
- Environmental non-compliance and corrective actions
- Environmental complaints
- Environmental incidents
- Environmental training
- Environmental monitoring and reporting

### Tuesday, 5th May 2015

1:00 pm – 3:00 pm      Googong Township – Site Office

- Matthew Lau - MIRVAC
- Katharine Bond - RPS

### Wednesday, 6th May 2015

9:00 am – 11:00 am      Stage AB Water Recycling Plant – Site Office

- Andre Kruize – JHPL
- Simba Kippaya – BMCA
- Katharine Bond – RPS

1:00 pm – 2:30 pm      Stage B Network (SPS2) – Site Office

- Michael Fields – Guideline ACT
- Aaron Wilson - BMCA
- Katharine Bond - RPS

3:00 pm – 4:30 pm      Stage A Network East (DN1800) – Site Office

- Adam Perry – Guideline ACT
- John Hyam – ICON Water
- Katharine Bond - RPS