

Sydney Biomedical Accelerator

# Independent Audit IA2 – Proponent's review and response

SSD-55388456

24 April 2026

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## Introduction

### Project Application Number and Project Name

SSD-55388456 – Sydney Biomedical Accelerator

### Site Address

Western Avenue and Cadigal Lane, Camperdown (Part Lot 1 DP11718004 and Part Lot 1000 DP1159799)

## Project Contact Details

Client Representative	Anthony Murphy, Janani Suseelar
Contractor	Richard Crookes Constructions

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## Independent Auditor

Josephine Heltborg, Morasey Environment Pty Ltd

## Independent Audit Date

13 March 2026

## Proponent response

The Independent Audit Report prepared by Morasey Environment Pty Ltd dated 13<sup>th</sup> March 2026 has been reviewed and the response to the audit findings are listed in the below table. In relation to non-compliance, the response sets out the action and the completion timing. In relation to observations and opportunities identified for improvement, the actions are also set out or the reason for not implementing any measures in response.

Table 1: IA2 Audit findings –

	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	PROponents RESPONSE TO AUDIT FINDINGS	RESPONSIBLE PERSON, DUE DATE & STATUS
<b>NON-COMPLIANCES</b>						
<b>IA2-NC01</b>	<b>C30</b>	All waste generated during construction must be assess, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	Only the initial -50T of material disposed from the site was classified under the EI Australia Waste Classification CertificateE26811.E05.010_ Rev0-SP6-GSWA, Dated 2/1/2026 as Special Waste Asbestos. Auditees and a letter prepared by EI Australia, dated 26/3/26 have stated the total amount of Special Waste Asbestos disposed from the site amounted to approximately 700Tonnes, leaving 650 Tonnes not classified. It is noted that because all of the excavated material was disposed as Asbestos Waste, the actual environmental risk is low but the discrepancy highlights inconsistencies in the waste classification process.	Ensure all future waste generated during construction is classified in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014).	The Principal Contractor acknowledges the finding and has addressed the matter with the Civil Contractor to ensure all waste generated during construction is fully classified prior to disposal in accordance with the Waste Classification Guidelines – Part 1: Classifying Waste (EPA, 2014) and project requirements. Ongoing monitoring of waste classification and disposal documentation will be undertaken to ensure continued compliance.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> To be verified during IA3 <b>Status:</b> OPEN
<b>OBSERVATIONS</b>						
<b>IA2-OBS 1</b>	<b>A25</b>	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act.  This includes conditions in respect	In September 2025, 354 vibration exceedances were detected at Monitoring Location A (Manhole North). The exceedances were attributed to construction of the access stairs and fencing close to the manhole. On 18-20 November the monitor was turned off at the request of the client to "allow for construction activities". There have	Confirm whether the Douglas Partners vibration monitoring reports are provided to Sydney Water and whether any action is required to address exceedances, or for the project turning the vibration monitor off to "allow for construction activities".	The Douglas Partners vibration monitoring reports have been provided to the projects Water Services Co-ordinator for submission to Sydney Water. Exceedances to date have been addressed with the projects Geotechnical Consultant, who is responsible for developing the detailed "Geotechnical Monitoring Plan" as a	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> To be verified during IA3 <b>Status:</b> OPEN

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	PROponents RESPONSE TO AUDIT FINDINGS	RESPONSIBLE PERSON DUE DATE & STATUS
		of incident notification, reporting and response, non-compliance notification, Site audit report and independent auditing.	been a high number of exceedances detected above the Sydney Water Guidelines and the "Allowed Vibration Limit" based on the potential for damage. It is not clear what actions are required to be taken in the event of an exceedance.		continuation of the project SEA reports. In accordance with the plan's trigger level requirements, works were halted and the project Geotechnical engineer was notified for review prior to continuation of works	
IA2-OBS 2	C21	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.	The ESCP does not reflect the stage of works active at the time of the audit and has not been updated during the project to reflect changing construction activities. The ESCP should be updated progressively throughout the project.	Review and update the ESCP to reflect the current stage of construction works and ensure continued progressive updates are made to accurately reflect site conditions and required controls.	The Principal Contractor acknowledges the finding and will ensure the ESCP is reviewed and updated to reflect the current stage of construction works.  The ESCP will be progressively updated throughout the project to accurately reflect changing site conditions and required controls	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> To be verified during IA3 <b>Status:</b> OPEN
IA2-OBS 3	C22	The Applicant must: a) ensure that only VENM, ENM, or other material that meets the requirements of a relevant order and exemption issued by the EPA, is brought onto the site;	The CEMP does not adequately describe the process for the import of fill to the site.	Review and update the CEMP Section 4.13.6 to describe in more detail legislative (and due diligence) requirements for material import. This should include the Section 143 certificate process, conducting inspections of the source site, and	The Principal Contractor will review and update CEMP Section 4.13.6 to provide a clear and detailed description of legislative and due diligence requirements	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> To be verified during IA3 <b>Status:</b> OPEN

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		b) keep accurate records of the volume and type of fill to be used; and c) make these records available to the Certifier and/or the Planning Secretary within seven days upon request.		conducting verification inspections of fill upon import to the site to ensure it is consistent with the classification.	for the import of fill. This will include the Section 143 certificate process, source site inspections, and verification inspections of imported fill to confirm consistency with the approved classification. The CEMP will be maintained to ensure ongoing compliance throughout the project	


Table 2: Review of previous audit findings –

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	PROPOSERS RESPONSE TO AUDIT FINDINGS	IA4 ASSESSMENT & STATUS
<b>SELF-REPORTED NON-COMPLIANCES</b>						
IA2-NC01	C20	During construction, the Applicant must ensure that: a) activities are carried out in a manner that minimises dust including emission of windblown or traffic generated dust; b) all trucks entering or leaving the site with loads have their loads covered; c) trucks associated with the development do not track dirt onto the public road network; d) public roads used by these trucks are kept clean; and e) land stabilisation works are carried out progressively on site to minimise exposed surfaces.	During the audit site inspection workers were observed to be using a gurney at the heavy vehicle access to wash mud from the sealed access road. A traffic controller was also observed to be using a hose to clean signs of tracking from the site entrance at Western Ave. This practice presents a risk of sediment entry to stormwater inlets and potential pollution and non-compliance with the Protection of the Environment Operations Act 1997. It is noted that stormwater inlets down-gradient of the heavy vehicle access were preventing water from entering the drain, though required replacement and were at risk of failure.	Communicate approved methods for cleaning mud tracking from roads to relevant personnel, e.g. street sweeper or manual sweeping. Ensure hoses and gurneys are not used for this purpose.	The Principal Contractor has addressed this by undertaking regular street sweeping of site access road Cadigal lane and Western avenue. Furthermore installation of additional protection coir logs/sed bags on inlet drains down Cadigal lane have been installed and any additional “wheel washing” is carried out onsite where water is managed/contained prior to vehicles/plant/machinery exiting onto bitumen roads. The Principal Contractor has including in ongoing weekly toolbox meetings to address specifically “no mud tracking onto roads and no washing down of roads with gurneys or hoses” to highlight the requirements of the site conditions and access roads and will continue to monitor and ensure compliance.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> ASAP <b>Status:</b> CLOSED No further actions are considered necessary
<b>OBSERVATIONS</b>						
IA1 – OBS 1	A25	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental	Vibration exceedances were identified in Reports 15, 19 & 21 for either Manholes A or B, but there is no explanation of the exceedances provided, or details about investigation into the exceedances.	Consider including an explanation for vibration exceedances in future vibration monitoring reports.	The Principal Contractor confirms ongoing vibration reports will have commentary against all exceedances as per communications for each exceedance occurrence with the monitoring parties.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> Prior to IA2 <b>Status:</b> CLOSED No further actions are considered necessary

<p><b>IA1 – OBS 2</b></p>	<p>audit under Division 9.4 of Part 9 of the EP&amp;A Act.</p>	<p>Water discharge permits do not include a record of total suspended solids (TSS) or NTU (water quality</p>	<p>Obtain a water quality monitoring meter to accurately measure pH and Turbidity prior to discharge.</p>	<p>The Principal Contractor confirms previous discharges were rain water, For upcoming ground water discharge the appropriate testing will be undertaken and recorded:</p>	<p><b>Responsible Person:</b> RCC Project Manager  <b>Due Date:</b> Prior to IA2</p>
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ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	PROONENTS RESPONSE TO AUDIT FINDINGS	IA4 ASSESSMENT & STATUS
		This includes conditions in respect of incident notification, reporting and response, non-compliance notification, Site audit report and independent auditing.	results are limited to pH). A photo of the water in an NTU tube is provided. This level of monitoring does not provide assurance that water is being discharged in accordance with the requirements of the Moits DMP which requires testing for pH, TSS and a visual inspection for oil and grease.	Alternatively engage a consultant to conduct water quality monitoring prior to discharge to stormwater. Ensure a water quality monitoring program for NEPC (2013) and ANZG (2018) is established and implemented once groundwater is reached and requires discharge.	Water discharge permits will now record total suspended solids (TSS) and/or NTU (water quality results are limited to pH). Records will show pH, TSS &/or NTU & a log a visual inspection for oil and grease prior to discharge/permit approved.	<b>Status:</b> CLOSED <i>No further actions are considered necessary</i>
<b>IA1 – OBS 3</b>			The majority of actions raised in Internal Environmental Audit No. 2, dated 12/8/2025 remained open at the time of this audit on 16/9/2025.	Set time frames for close-out of actions and follow-up until completion.	The Principal Contractor has confirmed ongoing environmental inspections (18.3) are to include a suitable timeframe per inspection item raised to ensure closeouts occur in a timely manner and ensure records of such close out are kept on our system “Hammertech”.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> Prior to IA2 <b>Status:</b> CLOSED <i>No further actions are considered necessary</i>
<b>IA1 – OBS 4</b>	<b>A26</b>	At least 48 hours before the commencement of construction until the completion of all works under this consent, or such other time as agreed by the Planning Secretary, the Applicant must: (a) make the following information and documents (as they are obtained or approved) publicly available on its website: (i) the documents referred to in Condition A2 of this consent; (ii) all current statutory approvals for the development; (iii) all approved strategies, plans and programs required under the conditions of this consent; ...	While the CEMP and Sub-plans were uploaded to the project website, they were not the current versions, e.g. CEMP Rev 1 (should be Rev 3), CNVMP Rev D (should be Rev E), CTPMP V07 (should be V09).	Review and update the versions of the CEMP and Sub-plans on the project website to ensure the current version is uploaded in accordance with Condition A26(a)(iii).	The Applicant and Principal Contractor will ensure to address the frequency of upload for updated documentation to the project website.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> Prior to IA2 <b>Status:</b> <b>OPEN</b> <b>Action from IA1 to be addressed</b>

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	PROponents RESPONSE TO AUDIT FINDINGS	IA4 ASSESSMENT & STATUS
IA1 – OBS 5	B25	Prior to the commencement of construction, the Applicant must provide sufficient parking facilities on campus, including for heavy vehicles, to ensure that construction traffic associated with the development does not utilise public and residential streets or public parking facilities.	Condition B25 has not been addressed in the CTPMP, Table 1-1 relevant consent conditions.	Review and update the CTPMP Table 1-1 to address Condition B26.	The Applicant and Principal Contractor will ensure to address and document further in the CTPMP the availability of parking facilities on/around the campus and provide further information on the construction workers alternative transportation strategies.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> Prior to IA2 <b>Status:</b> OPEN <b>Action from IA1 to be addressed.</b>
IA1 – OBS 6	B26	Prior to the commencement of any construction, the Applicant must submit a Construction Worker Transportation Strategy to the Certifier. The Strategy must detail the provision of sufficient parking facilities or other travel arrangements for construction workers in order to minimise demand for parking in nearby public and residential streets or public parking facilities. A copy of the strategy must be published on the Applicant’s website in accordance with Condition A34. This condition cannot be staged.	Condition B26 has not been addressed in the CTPMP, Table 1-1 relevant consent conditions.	Review and update the CTPMP Table 1-1 to address Condition B26.	The Applicant and Principal Contractor will ensure to address and document further in the CTPMP the availability of parking facilities on/around the campus and provide further information on the construction workers alternative transportation strategies.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> Prior to IA2 <b>Status:</b> OPEN <b>Action from IA1 to be addressed.</b>
IA1 – OBS 7	B27	Prior to the commencement of construction, the Applicant must provide sufficient temporary bicycle parking facilities in the vicinity of the site, equivalent in number to those recently removed adjacent to the Susan Wakil Health Building, for	Condition B27 has not been addressed in the CTPMP, Table 1-1 relevant consent conditions.	Review and update the CTPMP Table 1-1 to address Condition B26.	The Applicant and Principal Contractor will ensure to provide and document the temporary bicycle parking facilities in the vicinity of the site prior to the existing Susan Wakil Health Building bicycle storage being removed.	<b>Responsible Person:</b> RCC Project Manager <b>Due Date:</b> Prior to IA2 <b>Status:</b> OPEN <b>Action from IA1 to be addressed.</b>

ITEM	REF	REQUIREMENT	FINDING	RECOMMENDED ACTION	PROPONENTS RESPONSE TO AUDIT FINDINGS	IA4 ASSESSMENT & STATUS
		the duration of the construction works until bicycle parking forming part of the development is operational.				
IA1 – OBS 8	C21	All erosion and sediment control measures must be effectively implemented and maintained at or above design capacity for the duration of the construction works and until such time as all ground disturbed by the works have been stabilised and rehabilitated so that it no longer acts as a source of sediment. Erosion and sediment control techniques, as a minimum, are to be in accordance with the publication Managing Urban Stormwater: Soils & Construction (4th edition, Landcom, 2004) commonly referred to as the 'Blue Book'.	Coir logs and geofabric covering stormwater inlets at the entrance to the RCC site compound had deteriorated.	Refresh ERSED controls covering stormwater inlets at the entrance to the RCC site compound / former car park to reduce the risk of sediment entry.	<p>The Principal Contractor has confirmed ongoing environmental inspections (18.3) to include for the review of ERSED controls and highlight the requirements of controls replacement where necessary. This will continue to monitored and ensure compliant. Coir logs and geofabric witnessed during the audit were promptly replenished.</p> 	<p><b>Responsible Person:</b> RCC Project Manager  <b>Due Date:</b> Prior to IA2  <b>Status:</b> CLOSED  <i>No further actions are considered necessary</i></p>