

Hornsby Ku-Ring-Gai Hospital Redevelopment Stage 2 Environmental Audit



Assessment of Watpac's Environmental Management System Compliance Against ISO14001: 2015 and Project Conditions of Consent

Audit Reference:	AQ1236.01
Audit Organisation:	Watpac Pty Ltd
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1. Executive Summary

This report details the findings of the Environmental audit of the construction works undertaken by Watpac at the Hornsby Ku-Ring-Gai Hospital Stage 2. Construction activities commenced in early July 2018, and current works included location of services and in-ground services, approximately 5,000m³ of excavation, demolition of existing buildings including removal of hazardous materials, piling works, formwork and concrete structures. Watpac is the nominated Principal Contractor for the project and is responsible for the management of environmental aspects associated with the works.

The audit was conducted by AQUAS on 26th September 2018 and reviewed implementation of Watpac's Environmental Management System against the requirements of the AS/NZS ISO 14001: 2015 Standard and the requirements of the Project Development Consent SSD 8647.

The audit confirmed that Watpac has addressed the critical environmental requirements of the Conditions of Consent for current site activities. The contractor has identified the most significant environmental aspects at the worksite and implemented suitable controls. There was evidence of inductions and regular toolbox talks to maintain environmental awareness of all workers at the site. A Project Environmental Management Plan was in place and had been submitted to relevant stakeholders. As the site changes with the progress of the construction program, it was suggested to establish a specific frequency for reviews of the Plan and related documents, to ensure information and controls are maintained up to date.

Environmental controls for the identified aspects were in place and were consistent with the Conditions of Consent. These included suitable signage, noise and vibration controls, compliance with working hours, waste management, erosion and sedimentation measures, use of licenced contractors for removal and disposal of asbestos containing materials, and traffic controls. Communication means have been established to allow for community enquiries, feedback and complaints.

No environmental incidents have occurred so far and no non-conformances have been raised. The first Construction Compliance Report to be presented to the Department of Planning is not due as yet, but it was suggested that Watpac commences collection of information for preparation of this report, to be submitted towards the end of December 2018.

The details of the audit process and findings of this audit are detailed in the following sections of this report.

2. Audit Scope and Objectives

2.1 Objective and scope of this Audit

This audit was conducted to confirm compliance of the Watpac Environmental Management Plan and its implementation against the requirements of the Standard AS/NZS ISO 14001:2015 and applicable requirements of the Development Consent SSD 8647 for the Hornsby Ku-Ring-Gai Hospital Stage 2 Redevelopment Project.

2.2 Scope of Audit

The audit reviewed Watpac's implementation of their Environmental Management System for the construction activities currently taking place as part of the Hospital Stage 2 redevelopment project.

2.3 Date and Location of Audit

The audit was conducted on 26th September 2018 at the Hornsby Ku-Ring-Gai Hospital Stage 2 site – Palmerston Rd, Hornsby NSW 2077.

3. Audit Methodology

3.1 Opening Meeting

An opening meeting was held with personnel from Health Infrastructure, APP Corporation, Watpac and AQUAS as per the Audit Attendance Sheet (see **Appendix A**) on 26th September 2018 at 9:05am.

Key items were discussed as follows:

- Confirmation of the purpose and scope of the audit.
- Overview of the Project and current status of the works.
- Occurrence of Environmental incidents.
- Overview of the audit process in accordance with the proposed Audit Program.

3.2 Audit Process

The audit commenced with a general site walk where status of construction works and relevant environmental controls in place could be observed. The site walk was followed by review of records and general discussions with Watpac staff for verification of the Environmental Management System implementation on the project.

Name and position of persons interviewed:

Name	Organisation	Position
Nick Limbrey	Watpac	Project Manager
Helena Veljovic	Watpac	Environmental Manager/ Cadet

3.3 Audit Criteria

The following audit criteria/ratings were used for the rating of audit findings.

Audit Findings Rating	
N-Major	– Major Non-Conformance
N-Minor	– Minor Non-Conformance
OFI	– Opportunity for Improvement

3.4 Closing Meeting

The closing meeting was held on 26th September 2018 at 3:30pm with representatives of Health Infrastructure, APP Corporation, Watpac and AQUAS. General feedback and the findings of the audit were discussed during the closing meeting.

AQUAS auditors acknowledged the cooperation, openness and hospitality of Watpac staff during the conduct of this audit.

4. Audit Findings

4.1 Audit Overview

The audit determined that Watpac has well implemented controls for environmental management within the construction activities currently being undertaken. No major or minor non-conformances were identified and 5 Opportunities for Improvement (OFIs) were raised during the audit. The following is an overview of key Environmental areas reviewed in this audit:

4.1.1 Environmental Policy

- An Environmental Policy was in place, dated 1/07/2016. The policy is communicated to staff during inductions and is available on the Watpac website.
- The Project Environmental Management Plan (PEMP) outlines environmental objectives and targets.
- Objectives and targets are measurable and communicated, however achievement of these has not been evaluated – **OFI-01**.

4.1.2 Leadership, Planning and Resources

- An organisational chart for the project was available and main roles and responsibilities were outlined in the PEMP.
- Resources are allocated to the project as required. A number of trades work on different activities, e.g. demolition, plumbing, concreting, etc.
- The PEMP contains detailed information of the relevant environmental aspects, impacts and controls. Watpac noted that this information is reviewed periodically however a specific review frequency has not been established – **OFI-02**.
- A legal requirements register is in place with general project requirements. The aspects identified in the PEMP have a section where legal requirements are referenced.

4.1.3 Support

- All employees and subcontractors have to undertake a site induction, which contains awareness of environmental measures to be considered during construction.
- Toolbox Talks are conducted on a weekly basis to maintain ongoing awareness of safety and environmental matters onsite.
- Watpac has established means of internal and external communications, which include email, regular internal, subcontractor and client meetings, Aconex transmittals, etc. Community

- communications, e.g. letterbox drops are sent out as required.
- o A 'Disruption Works Notice' system is in place to inform the client of any construction works taking place which will affect the hospital operations.
 - o Watpac has developed a Project Environmental Management Plan to meet the requirements of the Development Consent. Environmental Sub-plans and other environmental documentation was also in place.
 - o So far, revisions of the environmental documentation have been submitted to Planning, however it was suggested that the PEMP should specify a minimum review frequency to ensure it is maintained up to date – **OFI-02**.
 - o Relevant environmental records are maintained in different ways, e.g. hard copies in folders, stored in Aconex and in the office shared drive.

4.1.4 Operation

- o Site signage was in place with information of the Builder, the Certifying Authority, Architect and the Structural Engineer, plus project contact information.
- o Design certificates were available for compliance with reflectivity, outdoor lighting and outdoor cladding requirements. Other elements such as mechanical ventilation and stormwater drainage works were designed to be compliant with BCA and Australian Standards.
- o Trees had been removed as per the Arborist report. Further controls for tree protection will be implemented later in the project.
- o Hours of work as per the Development Consent.
- o A Construction Noise and Vibration Management Plan was available. Controls were in place for noise mitigation including plant that requires low use of reverse alarms, bored piles and use of plywood panels.
- o Noise monitoring was conducted, and communication with Hospital and other sensitive receivers was managed for any exceedances.
- o Waste classification is outlined in the Waste Management Plan – Waste Streams report by Grass Hopper was available.
- o Bins and containers for different waste types were available throughout the site.
- o A concrete washout tray was in place with plastic liner.
- o Demolition of existing buildings involved removal of Asbestos Containing Materials. The removal and disposition was being conducted by a licenced contractor.
- o Erosion and sedimentation controls were in place around the site, including sandbags around drains, straw wattles and silt fences. Watpac noted that other drains present onsite had been disconnected.
- o A small sand stockpile was covered with black plastic. Excavated material is removed day by day.
- o A water cart sprays water for dust control during dry days. Not sighted, as there was wet weather on the day of the audit.
- o A rumble grid for removal of dirt from truck wheels was available.
- o A mix of solid hoardings and fencing was installed in the perimeter of the site and monitored to ensure good condition and absence of graffiti and advertising material.
- o A cabinet and a bunded area was available for storage of dangerous goods.
- o Watpac has prepared an Emergency Response Plan which includes a number of emergency scenarios and actions to follow for each one of them. However, scenarios did not include the potential for explosion of the existing oxygen tank located in close proximity to the construction site – **OFI-03**.
- o Emergency Plan is periodically reviewed and revised as the site layout changes over time.
- o Spill kits were available onsite.

4.1.5 Performance Evaluation

- o Environmental inspections are conducted by the contractor weekly. Inspection reports were available.
- o A Construction Compliance Report for the Department of Planning, as per the Condition of Consent, has not yet been prepared as the first report will be due around December 2018. It was suggested that Watpac start collecting the necessary information for the six-monthly compliance report – **OFI-04**.
- o Discussions with the client are underway in relation to the requirement to make information available on Watpac’s website about statutory approvals, approved strategies, performance reporting, complaints and other project information.

4.1.6 Improvement

- o A Corrective Actions Register and Corrective Action Report form were available.
- o No environmental non-compliances have been identified so far in the project.
- o There is a 24-hour enquiries number and email address in the signage outside the worksite available for the community, however a postal address was not available – **OFI-05**.
- o A Complaints Register is available where information about the complaints is recorded including resolution reached.
- o No environmental incidents have occurred so far in the project.

4.2 Identified Findings

The table below outlines the findings raised during the audit:

Finding No.	Ref.	Finding	Comment/ Recommendation
OFI-01	ISO 14001 Cl. 6.2.2, 9.1.1	Objectives and Targets are not specifically measured to track achievement of the desired environmental outcomes.	Consider conducting assessment of compliance with the environmental objectives and targets established in the PEMP.
OFI-02	ISO 14001 Cl. 6.1.2; SSD Cl. A15, A16	Review of the PEMP and associated documents is done as necessary, however a minimum review frequency is not established or documented.	Consider establishing and documenting a minimum review frequency (e.g. six-monthly or as required) of the PEMP and other relevant environmental documents, and submit to the Planning Secretary for approval.
OFI-03	ISO 14001 Cl. 8.2	The potential for a gas explosion is not included in the possible emergency scenarios as part of the Emergency Response Plan.	Consider including gas explosion as a potential emergency scenario in the Emergency Response Plan
OFI-04	SSD Cl. B37, B38, C30	A six-monthly Construction Compliance Report has not yet been prepared, as the project is only three months into construction.	Consider beginning to collect the necessary information for preparation of the first Compliance Report as per clause B38 of the SSD.
OFI-05	SSD Cl. B30	A postal address has not been included in the information sign outside the construction site.	Consider consulting with the client to decide whether this information is necessary and take action accordingly.

5. Conclusion

This audit was completed to assess the environmental controls established by Watpac against the requirements of the Development Consent for the project. The audit confirmed that Watpac has implemented its Environmental Management System to a satisfactory level and only opportunities for improvement were identified as part of the review.

The following table summarises the audit findings by rating category:

Findings Rating	Findings
Major Non-Conformance	0
Minor Non-Conformance	0
Opportunity for Improvement	5

It is suggested Watpac takes the feedback from this audit as an opportunity to make improvements in Environmental performance during the progress of the Project.

Appendix A. [Audit Attendance Sheet]

AUDIT ATTENDANCE SHEET



PROJECT: Hornsby Ku-Ring-Gai Hospital ^{Stage 2} AUDIT No.:

AUDITEE: Watpac Construction LEAD AUDITOR: Luis Garzon - AQUAS

MEETING LOCATION: Watpac Site office

OPENING MEETING DATE AND TIME: 26/9/18 - 9:05am

CLOSING MEETING DATE AND TIME: 26/9/18 - 3:30pm.

NAME	ORGANISATION	POSITION	SIGNATURE	
			OPENING MEETING	CLOSING MEETING
Luis Garzon	AQUAS	Auditor		
BRAD EMBURY	APP	PM		
JOSH SCHARRECKER	HI	PD		
Helena Vepic	Watpac	environmental manager/cadet		
Sam Jeffrey	APP	Project manager		
Ned Lindsay	watpac	Project manager		
T. Searle	WATPAC	PROJECT ENGINEER		

Appendix B. [Audit Checklist]

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
1.0	Environmental Policy (5.2)			
1.1	5.2	The Contractor has an Environmental policy authorised by top management. It includes: <ul style="list-style-type: none"> - commitment to continual improvement and prevention of pollution - commitment to comply with applicable legal and other requirements 	Policy sighted 1/7/2016	Y
1.2	5.2	The policy is communicated to all persons working for or on behalf of the organisation	Done through inductions	Y
1.3	5.2	The policy is available to the public	Watpac website – available	Y
1.4	Environmental Objectives and planning to achieve them (6.2)			
1.5	6.2.1	The Contractor has documented Environmental objectives and targets for relevant functions and levels of the project. The objectives and targets are consistent with the environmental policy, including the commitment to: <ul style="list-style-type: none"> - prevention of pollution - compliance with applicable legal and other requirements - continual improvement 	PEMP Section 5 – key indicators for each of the aspects 2.3 – KPIs. Objectives address prevention of pollution and compliance with applicable legal and other requirements. However, continual improvement is not specifically addressed.	Y
1.6	6.2.1	The objectives and targets are <ul style="list-style-type: none"> - measurable, where practicable - communicated 	Objectives are measurable. These are communicated through the use of the plan.	Y
1.7	6.2.2	The Contractor has established, implemented and maintained a plan(s) for achieving its objectives and targets	Through the implementation of the PEMP, and generally review through inspections and audits. However, achievement of targets is not specifically assessed. Suggest to monitor the achievement of KPIs.	OFI-01

Audit Compliance Codes: Y: Compliance achieved; N-Major: Major non-conformance; N-Minor: Minor non-conformance; OFI: Observation for Improvement

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
2.0	Leadership (5.0), Planning (6.0) and Resources (7.1)			
2.1	Resources, roles, responsibility and authority (5.3)			
2.2	7.1	The Contractor has identified and provided the resources required to implement the EMS for the project, including: <ul style="list-style-type: none"> - human resources and specialised skills – Org Chart - technology & financial resources 	Presented Project Organisational Chart Rev. 3.1 Resources in place.	Y
2.3	5.3	Roles, responsibility and authority have been defined, documented and communicated in order to facilitate environmental management.	Position descriptions available for each employee. PEMP Section 3 – 4 key roles, e.g. <ul style="list-style-type: none"> - Construction/Operations Manager - Quality and Environmental Manager – 3 nationally - Project Manager - Project Environmental Coordinator - Site Manager - Foreman - Direct labour - Sub-contractors 	Y
2.4	-	A management representative(s) has been appointed by the Contractor and has defined roles, responsibilities and the authority for: <ol style="list-style-type: none"> ensuring the EMS is established, implemented and maintained in accordance with the Standard reporting to top management on EMS performance for review, including recommendations for improvement 	Project Manager / QSE Manager, as required	Y
2.5	Environmental aspects (6.1.2)			
2.6	6.1.2	The Contractor has identified the environmental aspects of its activities, products and services – and those with significant environmental impacts. This has considered planned or new developments, or new or modified activities, products and services.	PEMP Section 5 – Environmental aspects. Sec. 5.3 lists the ‘significant’ aspects. Presented an Environmental Risk Assessment – analysed all possible risks, some standard for all projects, some specific 12/3/2018 (Appendix 6.2). Format <ul style="list-style-type: none"> - Objective - KPI - Actions / strategy 	Y

Audit Compliance Codes: Y: Compliance achieved; N-Major: Major non-conformance; N-Minor: Minor non-conformance; OFI: Observation for Improvement

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
2.7	6.1.2	The Contractor has documented this information and kept it up to date – Aspects/Impacts Register	All documented (as above). Section 2.2 refers to continuous improvement through reviews and audits, however a timeframe for review is not specified. Suggest to establish in writing the intent to review the Aspects/Impacts Register periodically (e.g. every 6 months) or as required.	OFI-02
2.8	Compliance Obligations (6.1.3)			
2.9	6.1.3	The Contractor has identified all legal and other requirements relevant to its environmental aspects and how they apply to the project.	<ul style="list-style-type: none"> - Legal Requirements Register (Appendix 6.6) has the general requirements for projects (for reference). - PEMP Section 5, under each of the listed aspects has as legal reference. 	Y
2.10	6.1.3	The Contractor has procedures for periodically evaluating compliance with applicable legal requirements. Records of the results of periodic evaluations are maintained	Done through internal audits, routine reviews of the CEMP, inspections	Y
2.11	6.1.3 9.1.2	The Contractor periodically evaluates compliance with other requirements to which it subscribes, and keeps records of the results of evaluations.	No specific evaluation of all requirements, e.g. Development Consent. Would be through the Construction Compliance Reports, not done yet.	NA
3.0	Support (7.0)			
3.1	Competency, training and awareness (7.2, 7.3)			
3.2	7.2	<p>The Contractor has ensured that employees and subcontractors are competent on the basis of appropriate education, training or experience.</p> <p>Relevant training and competency records have been retained.</p>	<p>HR recruitment process managed by head office.</p> <ul style="list-style-type: none"> - Sub-contractors: through the Tendering process – selection of qualified personnel – questionnaire to be completed. - Other, e.g. Spill kit training / emergency drills e.g. asbestos and lead product awareness – booked for 23 October 2018 <p>Has approx. 12 sub-contractors, e.g. Demolition, Plumbers, ACI, Concreters, etc.</p>	Y
3.3	7.3	<p>The Contractor has established a procedure to provide awareness to employees and subcontractors on:</p> <ol style="list-style-type: none"> a) the importance of conformity with the environmental policy, procedures and requirements of the EMS b) the significant environmental aspects and related actual or potential impacts associated with their work, and the environmental benefits of improved personal performance, 	Go through induction for all staff. Includes working hours, hazardous substances, emergencies, lighting, and other specific environmental elements.	Y

Audit Compliance Codes: Y: Compliance achieved; N-Major: Major non-conformance; N-Minor: Minor non-conformance; OFI: Observation for Improvement

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
		<ul style="list-style-type: none"> c) their roles and responsibilities in achieving conformity with the EMS d) the potential consequences of not following the relevant procedures. 	<p>Conduct of Toolbox talks – depending on actual circumstances can have WHS, Environmental and other topics. Done every Monday</p> <p>Have online training modules (corporate) – some are mandatory e.g. company induction (including QEHS)</p>	
3.4	C31	The Applicant must ensure that all of its employees, contractors (and their sub- contractors) are made aware of, and are instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.	Apart from inductions and Toolbox Talks there is the provision of the SSD and the requirement to comply with all applicable requirements in the project documentation for the sub-contractors.	Y
3.5	Communication (7.4)			
3.6	7.4.2	Procedures are in place for ensuring internal communication with regard to the environmental aspects and the EMS	<p>Comms for updated forms and other system updates from Head Office via email</p> <p>Hold weekly team meetings – e.g. 12 Sept 2018 sighted meeting minutes. Includes an environmental section.</p> <p>Weekly sub-contractors meeting e.g. 20/09/2018 similar to the internal one. Included actions for sub-contractors e.g. installation of shaker by Delta.</p>	Y
3.7	7.4.3	<p>Procedures are in place for communications with external parties, e.g.</p> <ul style="list-style-type: none"> a) EPA, Council, Hospital, others b) Community engagement – provision of information, sensitive receivers, follow up 	<p>Have a weekly meeting with Hospital – not minuted as they have the details in the 'Disruption Works Notices' e.g. sighted No. #025 3/9/2018 for internal relocation of hoarding on a walkway</p> <p>With Council – minor communications e.g. traffic, trees; send information required in SSD.</p> <p>Community – nothing to be sent without APP/HI approval e.g. commencement letter 28th June 2018 – sent to 131 addressees (information about start of the project) – letter box drops.</p>	Y

Audit Compliance Codes: Y: Compliance achieved; N-Major: Major non-conformance; N-Minor: Minor non-conformance; OFI: Observation for Improvement

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
3.8		Documentation (7.5)		
3.9	7.5	<p>The Contractor has procedures for control of documents and records, which includes:</p> <ol style="list-style-type: none"> approval of documents for adequacy prior to issue review and update and re-approval ensuring that changes and the current revision status of documents are identified ensuring that relevant versions of applicable documents are available at points of use ensuring that documents remain legible and readily identifiable ensuring that relevant documents of external origin for the planning and operation of the EMS are identified and their distribution controlled preventing the unintended use of obsolete documents and applying suitable identification to them if they are retained for any purpose 	<ul style="list-style-type: none"> - 'Watkins' system – has all current system documents, templates, forms, etc. - Aconex – project specific documentation e.g. the EMP - Authorisation in the plan. - Documents are available in the server. - Have access to the NSW Gov. page for the project e.g. for SSD. - Aconex docs – only have the current versions (older not shown) G-Drive – have a 'superseded docs' folder 	Y
3.10	B22	<p>Construction Environmental Management Plan</p> <ol style="list-style-type: none"> Prior to the commencement of construction works, a CEMP must be submitted for the approval of the Certifying Authority. The CEMP must address, but not be limited to, the following matters where relevant: <ol style="list-style-type: none"> hours of work; 24 hour contact details of site manager; traffic management, in consultation with Council and TfNSW; construction noise and vibration management, prepared by a suitable qualified person; management of dust and odour to protect the amenity of the neighbourhood; erosion and sediment control; stormwater control and discharge; measures to ensure that sediment and other materials are not tracked onto the roadway by vehicles leaving the Subject Site; 	<p>CEMP – Rev. 2 of 25/6/2018 – authorised by PM.</p> <ol style="list-style-type: none"> Transmittal to HI/APP 20/03/2018 via Aconex – original plan Email of 19/09/2018 – sent updated plans to Planning NSW. Aconex of 12/04/2018 to the Certifier. No comments have been received from either party. Aspects required in SSD Cl. B22 addressed generally in: <ul style="list-style-type: none"> - PEMP and Sub-Plans - Traffic management is an Appendix to the Safety Management Plan. - PEMP Aspects (Section 5) Has a Noise and Vibration for Hospital as a 'sensitive receiver' (not in the SSD) – but not been submitted to the client. Plan submitted – as per item a) above. 	Y

Audit Compliance Codes: Y: Compliance achieved; N-Major: Major non-conformance; N-Minor: Minor non-conformance; OFI: Observation for Improvement

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
		<ul style="list-style-type: none"> ix) procedures for encountering groundwater during construction works; x) external lighting in compliance with AS4282:1997 Control of the Obtrusive Effects of Outdoor Lighting; xi) a protocol detailing appropriate procedures for identifying and dealing with unexpected finds of site contamination (including asbestos containing materials, Polycyclic aromatic hydrocarbons (PAHs), Total recoverable hydrocarbons (TRH) and lead-based paint); xii) a protocol detailing appropriate procedures for identifying and dealing with unexpected finds of archaeological heritage; xiii) waste classification (for materials to be removed) and validation (for materials to remain) be undertaken to confirm the contamination status in these areas of the site; and xiv) waste storage, recycling and litter control; <p>b. The CEMP must not include works that have not been explicitly approved in this development consent. In the event of any inconsistency between the consent and the CEMP, the consent must prevail; and</p> <p>c. The Applicant must submit a copy of the CEMP to the Department and Council prior to commencement of work.</p>		
3.11	B24, B25, B26	<p>Other Specific Management Plans:</p> <ul style="list-style-type: none"> - Construction Noise and Vibration Management Plan - Construction Waste Management Plan: - Construction Traffic and Pedestrian Management Plan to be submitted for approval of the Certifying Authority, and to be implemented for the duration of the project. 	<p>Plans in place:</p> <ul style="list-style-type: none"> - CNVMP - WMP – use grasshopper as removal sub-contractor - TMP – Part of the Safety Management Plan Submitted and in implementation. 	Y
3.12	A15, A16	<p>If necessary the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Secretary.</p> <p>Where revisions are required, the revised document must be submitted to the Planning Secretary for approval within six weeks of the review.</p>	<p>Initial documents sent in March 2018 and recent updates sent in September 2018.</p> <p>PEMP Section 4.13 states that the PEMP is to be revised with any applicable changes. Suggest to establish specific review frequency of the Plans and other relevant Environmental documents (e.g. six-monthly or as required)</p>	OFI-02

Audit Compliance Codes: Y: Compliance achieved; N-Major: Major non-conformance; N-Minor: Minor non-conformance; OFI: Observation for Improvement

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
3.13	C1	Approved Plans to be On-site. A copy of the approved and certified plans, specifications and documents incorporating conditions of approval and certification must be kept onsite at all times and must be readily available.	As per Checklist Item 3.9 – available in site office, in Server.	Y
3.14	Control of records (7.5)			
3.15	7.5.3	The Contractor has established and maintained necessary records to demonstrate conformity to the requirements of its EMS and the Standard, and the results achieved.	PEMP Sec. 4.12. - Safety e.g. Inductions, Toolbox Talks – hard copies - Inspections, other environmental records – have a folder in shared drive e.g. complaints, waste - Reports - Aconex	Y
3.16	7.5.3	Procedures have been established for the identification, storage, protection, retrieval, retention and disposal of records.	Part of the Head Office Management System procedures – Document Control procedure Have a document controller.	Y
4.0	Operation			
4.1	Operational controls (8.1)			
4.2	8.1	The Contractor has identified and planned controls associated with the significant environmental aspects to ensure that operations are carried out under conditions that minimise harm to the environment.	All Aspects identified in the CEMP have Management Strategy and specific actions e.g. Protection of utility services: - Strategy – e.g. awareness; marking - Actions – e.g. scanning (non-destructive); OHW protections; DBYD; etc.	Y
4.3	Conditions of Development Consent – Before Commencement of Works			
4.4	A6	No consent is granted for the demolition of the 'Palmerston' building.	Not part of SoW. Was a provision under the submission, not approved at this point.	Y
4.5	A19, EPA Reg. Cl 98A,	Prescribed conditions – Signage: 2) A sign must be erected in a prominent position on any site on which building work, subdivision work or demolition work is being carried out:	Sighted during site walk, required items included.	Y

Audit Compliance Codes: Y: Compliance achieved; N-Major: Major non-conformance; N-Minor: Minor non-conformance; OFI: Observation for Improvement

Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
	C23	(a) showing the name, address and telephone number of the principal certifying authority for the work; (b) showing the name of the principal contractor (if any) for any building work and a telephone number on which that person may be contacted outside working hours; (c) stating that unauthorised entry to the work site is prohibited. Site Notice – to include certifying authority, structural engineer, the approved hours of work.		
4.6	B3, B4	Reflectivity, Outdoor lighting Compliance with requirements	Certifier has provided all the architectural drawings including exterior finishing schedule. Sighted - Certificate of Design for reflectivity of 7/09/18 by Bonacci Group. - Electrical Design Cert. Wood & Grieve Eng. 15/8/18	Y
4.7	B5-B8	Hazards – design of oxygen supply Compliance with oxygen supply requirements	- In process of deciding what to do about upgrading the existing oxygen tank. Currently a shed for protection has been installed.	-
4.8	B12	Pre-Construction dilapidation reports Report submitted to the satisfaction of the Certifying Authority & copy to Council	- Email of 19/09/2018 sent to Planning and Council with dilapidation reports. - Presented 4 reports: - Derby – Watpac - Star and Hope – Structural Engineer (Cardno) - Cottage 93 – Watpac - Little Learning School – Structural Eng. 04/09/18 Photographic report / condition of building	Y
4.9	B15	Mechanical ventilation Compliance with requirements	Permanent design item, done to BCA and relevant Australian Standards.	Y
4.10	B19, B20	Stormwater and Drainage Works Designed in accordance with Council's relevant specifications and standards and other specific requirements. Water treatment system designed as per Council requirements	As above	Y

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Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
4.11	B34	External Walls and Cladding Compliance with requirements of the NCC	Design has been submitted – final design. Sighted various Certificates for Alcadex, Deco, Finesse, Terracade, etc.	Y
4.12	B42 B45	Tree Protection The tree protection measures outlined in the <i>Arboricultural Development Assessment Report</i> , prepared by Moore Trees, dated October 2017, are to be implemented and maintained. Certification from the arborist required.	Have a report from Moore Trees – provide a Tree Protection Plan Sighted email 25/09/2018 with response from Nick – no action at the moment (for retained trees) – in 2020 +/- Tree removal – sent application to council; some were done by a licenced arborist.	
4.13	B43	A project arborist with AQF Level 5 qualifications must be appointed to provide monitoring and certification throughout the construction period.	Moore Trees	Y
4.14	B44, C32	Tree protection fencing for the trees to be retained must be erected around trees to be retained at a minimum distance based on the trees structural root zone Building materials and Site Waste The filling or stockpiling of building materials, the parking of vehicles or plant, the disposal of cement slurry, waste water or other contaminants must be located outside the tree protection zones as prescribed in the conditions of this consent.	N/A for now. Will become relevant at a later stage.	NA
4.15	B46	Ecologically sustainable development – details of design measures to be submitted, equivalent to Green Start Health Care 4 star rating	To be reviewed during next audit – talk to Design Manager	-
4.16	Conditions of Development Consent – During Construction			
4.17	C2, C3	Construction Hours Compliance with requirements	7am – 6pm (weekdays) – usually end at 4pm 8am – 7pm (weekends)	Y
4.18	B14	Construction Noise Management	Noise management during construction as per the CNVMP. Some design elements (for final building), e.g. generators insulation.	Y

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Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
		Applicant must incorporate all relevant noise mitigation recommendations in the letter <i>Hornsby Ku-ring-gai Hospital Stage 2 Redevelopment - Response to Planning NSW Queries</i> prepared by Acoustic Logic, dated 26 April 2018, in the detailed design drawings and submit for the approval of the Certifying Authority.		
4.19	C4	All feasible and reasonable noise mitigation measures must be implemented and any activities that could exceed the construction noise management levels must be identified and managed in accordance with the CNVMP required under condition B25.	Conduct Noise Monitoring readings – sighted map with reading points (4 of them) Controls established as per Acoustic Logic Report, e.g. - Machinery to be used, e.g. to avoid use of reverse beep - Bored piles (rather than driven piles) - Use of plywood panels (rather than 'acoustic panels')	Y
4.20	C6	The Applicant must ensure construction vehicles do not arrive at the Subject Site or surrounding residential precincts outside of the construction hours of work outlined under condition C2.	There is a specific area for construction vehicles to park to bring materials or load with waste. Only scheduled during working hours.	Y
4.21	C7	The Applicant must schedule intra-day 'respite periods' for construction activities identified in the Interim Construction Noise Guideline	Some exceedances expected – e.g. vibration during pouring – communicate with the hospital / receivers Go by communications with the Hospital. Respite – during staff breaks. No complaints about noise have been received.	Y
4.22	C8	Wherever practical, and where sensitive receivers may be affected, piling activities are completed using bored piles	Done, as per checklist item 4.19	Y
4.23	C9	The Applicant must implement, where practicable and without compromising the safety of construction staff or members of the public, the use of audible movement alarms of a type that would minimise noise impacts on surrounding noise sensitive receivers.	Minimise use of reversing in vehicles. Have a regime for maintenance of equipment	Y
4.24	C11	Vibration Criteria Vibration caused by construction works to meet the established limitations.	Criteria to work to: 1mm/s 1 vibration monitor installed (set to 0.5mm/s). - No exceedance alerts received Report not received yet (done by Delta)	Y

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4.25	C14	Waste All waste generated during construction must be assessed, classified and managed in accordance with the Waste Classification Guidelines Part 1: Classifying Waste (EPA, 2014)	Presented report from Grass Hopper – Have a report for August 2018 – waste streams – 85% recycled.	Y
4.26	B17	Storage and Handling of Waste An appropriate area will be provided within the premises for the storage of garbage bins, recycling containers and all waste and recyclable material generated by the site.	Observed during site walk – Bins and containers for different waste streams located in different locations within the site.	Y
4.27	C15	The body of any vehicle or trailer used to transport waste or excavation spoil must be covered before leaving the premises to prevent any spillage or escape of any dust, waste of spoil. Mud, splatter, dust and other material likely to fall from or be cast off the wheels, underside or body of any vehicle, trailer or motorised plant leaving the site must be removed before leaving the premises.	Trucks have a cover coming out of a mast – process observed.	Y
4.28	C16	The Applicant must ensure that concrete waste and rinse water are not disposed of on the Subject Site and are prevented from entering any natural or artificial watercourse.	Observed during site walk – there is a concrete washout tray.	Y
4.29	C34	Excavated Material All excavated material removed from the site must be classified by a suitably qualified person in accordance with the Department of Environment, Climate Change and Water NSW Waste Classification Guidelines prior to disposal to an approved waste management facility.	Excavated material is removed from site day by day. Sighted various dockets of waste delivered to different waste facilities according to classification.	Y
4.30	C36	Trade Waste Liquid trade waste generated on the site must be discharged in accordance with a trade waste agreement with Sydney Water and by a licensed liquid trade waste contractor.	No trade waste. When required, water is tested, pumped out to stormwater after verification of measurements.	Y
4.31	C22	Demolition To protect the surrounding environment, all demolition work must be carried out in accordance with "Australian Standard	Removal of asbestos has been performed. Done by a licenced removal contractor and sent to an approved facility. See checklist item 4.35.	Y

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Item	ISO/DSS Cl.	Audit Criteria	Documentation Reference	Compliance Rating
		<p>2601-2001 - The Demolition of Structures" and the following requirements:</p> <ul style="list-style-type: none"> - Demolition material must be disposed of to an authorised recycling and/or waste disposal site and/or in accordance with an approved waste management plan - Any asbestos to be removed by a licenced contractor - Meet signage requirements 		
4.32	B11, C19	<p>Erosion and Sediment Control</p> <p>Soil erosion and sediment control measures must be designed in accordance with Blue Book & approved by certifying authority.</p> <p>Control measures to be effectively implemented and maintained for the duration of the works.</p>	<p>TTW – civil consultants – provided a Sediment Control Plan – mostly from Blue Book – CIV-DNG-00-902 Rev. A 28/06/2018 issued for construction.</p> <p>Controls observed during site visits, e.g. sand bags around drains.</p> <p>Some drains have been disconnected.</p>	Y
4.33	C20	<p>Disposal of Seepage and Stormwater</p> <p>Not to be pumped to the street stormwater system unless approved</p>	<p>Waste is tested and pumped to stormwater drain if below limits e.g. 'Water Meter Report Card' of 14/09/2018: Turbidity 23 NTU (<50); pH 6.77 (between 6.5 and 8) – Ok to dispose of.</p>	Y
4.34	C12	<p>Contamination</p> <p>Remediation works at the site are to be undertaken in accordance with the recommendations and findings of the Remediation Action Plan prepared by Douglas Partners and dated May 2018.</p>	<p>An old fuel storage tank had to be removed and soil remediated – followed a process for cleaning / decommissioning / removal of tank and removal of contaminated soil.</p> <ul style="list-style-type: none"> - stockpile / test / classify / remove - sighted docket (42) of GSW sent to Genesis 	Y
4.35	C17	<p>Handling of Asbestos</p> <p>The Applicant is to consult with SafeWork NSW concerning the handling of any asbestos waste that may be encountered during construction</p>	<p>Used licenced contractors (Delta / ASP) – sighted Asbestos Removal Control Plan</p> <p>Sighted docket sent to Genesis (by Delta) – 36 of them August 2018</p> <p>Have: - Asbestos Register</p> <ul style="list-style-type: none"> - Air monitoring and clearance - WorkCover notification – by ASP 20/08/2018 	Y
4.36	C18	<p>Unexpected Finds - Non-Aboriginal Heritage</p>	<p>No cultural / non-Aboriginal Heritage finds. Mentioned statues of lions, which have been saved and will be relocated.</p>	Y

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		Procedure in place, cease works, contact OEH, assess, take action.		
4.37	C25, C26	Hoarding/Fencing Requirements A temporary hoarding, fence or awning must be erected between the work site and adjoining lands before the works begin and must be kept in place until after the completion of the works; Other requirements: no advertising material, no graffiti	Have a mixture of solid hoardings and fencing in the perimeter of the site. Condition monitored daily.	Y
4.38	C33	Council Property – no materials on footpath	Site is well enclosed, no materials present on footpath as observed during site walk.	Y
4.39	C35	Storage of Flammable and Combustible Goods in bunded area	Delta has a cabinet for dangerous goods with bunded area. Have a locked cage for gases.	Y
4.40	C37	Traffic Control Compliance The development must be carried out in accordance with the Construction Traffic Management Plan prepared under this consent.	Have permanent traffic controllers at the site entry. TMP prepared by RTMS (staff blue card) Will submit another plan if required (e.g. as it happened for crane erection). Presented a Vehicle Movement Plan – for long vehicles – sent to all relevant contractors	Y
4.41	Emergency preparedness and response (8.2)			
4.42	8.2	The Contractor has established procedures to: <ul style="list-style-type: none"> - identify potential emergency situations and potential accidents that can have an impact(s) on the environment - determine how it will respond to them 	Have an Emergency Response Plan signed by the PM. Different scenarios are included, safety and environmental. However, scenarios did not include potential gas explosion or uncontrolled gas leak. It is suggested to include this scenario as there is an oxygen tank in close proximity to the construction site. Have flowcharts for: <ul style="list-style-type: none"> - Notifications - Injuries - Evacuation - Medical emergencies - Fire An emergency contacts list is in place	OFI-03

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4.43	8.2	The emergency response procedures include measures to prevent or mitigate associated adverse environmental impacts.	As above	Y
4.44	8.2	Emergency preparedness and response procedures are periodically reviewed and revised, as necessary, in particular, after the occurrence of accidents or emergency situations. Emergency preparedness and response procedures are periodically tested, where practicable	Emergency Plan gets reviewed periodically, as the site layout changes	Y
5.0	Performance Evaluation (9.0)			
5.1	Monitoring and measurement (9.1)			
5.2	9.1	Documented procedures have been established to monitor and measure on a regular basis the key characteristics of operations that can have significant environmental impacts.	Conduct weekly Environmental Inspections – have a folder with inspections e.g. 3/08/2018 with notes and photos.	Y
5.3	9.1.1	The procedures include: <ul style="list-style-type: none"> - the documenting of information to monitor performance - effectiveness of applicable operational controls - conformity with the organization's environmental objectives and targets 	Monitoring documented in the PEMP. Effectiveness to be assessed when preparing Performance Report for Planning – not done yet. Conformity with environmental objectives and targets not currently assessed. See checklist item 1.7	OFI-01
5.4	9.1.1	Monitoring and measuring equipment is calibrated, maintained and stored as necessary. Records or calibration are maintained	Noise monitor self-calibrates – gets a new device each year.	Y
5.5	B35, B36	Compliance Reporting A Pre-Construction Compliance Report must be prepared for the development, and submitted to the Certifying Authority for approval before the commencement of construction works.	Report by Blakett and McGuire Goldsmith.	Y
5.6	B37, B38, C30	Construction Compliance Reports must be submitted to the Department at compliance@planning.nsw.gov.au for information every six months from the date of commencement of construction, for the duration of construction. The Construction Compliance Reports must provide details on the compliance performance of the development for the preceding six months and must be submitted within one month following the end of	As works commenced approximately 3 months ago the first report has not yet been prepared. Suggest to start collecting information required for the preparation of the Construction Compliance Report to be submitted at the end of the first six-months of construction.	OFI-04

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		<p>each six-month period for the duration of construction of the development, or such other timeframe as required by the Secretary.</p> <p>The Construction Compliance Reports must include:</p> <ul style="list-style-type: none"> a) a results summary and analysis of environmental monitoring; b) the number of any complaints received, including a summary of main areas of complaint, action taken, response given and proposed strategies for reducing the recurrence of such complaints; c) details of any review of the CEMP and the Environmental Management Strategy and associated sub-plans as a result of construction carried out during the reporting period; d) a register of any modifications undertaken and their status; e) results of any independent environmental audits and details of any actions taken in response to the recommendations of an audit; f) a summary of all incidents notified in accordance with this consent; and g) any other matter relating to compliance with the terms of this consent or requested by the Secretary. 		
5.7	C27	<p>At least 48 hours before commencement of construction until the completion of all works, the Applicant must make the following information and documents publicly available on its website:</p> <ul style="list-style-type: none"> - statutory approvals - approved strategies, plans and programs - performance reporting & monitoring results - project status - complaints register <p>Information must be kept up to date.</p>	<p>Watpac is in discussion with HI about this requirement. Not yet resolved.</p>	-
5.8		<p>Internal Audit (9.2)</p>		
5.9	9.2	<p>The Contractor has ensured that internal audits of the EMS are conducted at planned intervals to determine:</p> <ul style="list-style-type: none"> a. whether it conforms to planned arrangements for environmental management including the requirements of the Standard 	<p>Not yet. An audit is to be done within the next 3 months (done typically six-monthly).</p>	-

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		b. whether it has been properly implemented and is maintained		
5.10	Management Review (9.3)			
5.11	9.3	Top management reviews the EMS at planned intervals to ensure its continuing suitability, adequacy and effectiveness. Reviews include assessing opportunities for improvement and the need for changes to the EMS, including the environmental policy and environmental objectives and targets.	Happens at a Head Office level.	-
6.0	Improvement (10.0)			
6.1	Nonconformity, corrective and preventive action (10.2)			
6.2	10.2	Procedures are in place for: <ol style="list-style-type: none"> identifying and correcting nonconformities and taking actions to mitigate their environmental impacts investigating nonconformities, determining their causes and taking actions in order to avoid their recurrence evaluating the need for actions to prevent nonconformities or avoid their occurrence recording the results of corrective and preventive actions taken reviewing the effectiveness of corrective and preventive actions 	Have a Corrective Actions Register and Corrective Action Report Form, e.g. - Sent a notice via Aconex with issue identified during weekly inspection 27/07/2018 (Geofab not well placed in drain). Officially closed out on 1/08/2018.	Y
6.3	10.2	Any necessary changes arising from corrective and preventive actions are reflected in the EMS documentation.	Reviews to be made as required.	Y
6.4	A12	The Department must be notified in writing to compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of any non-compliance. The Certifying Authority must also notify the Department within seven days after they identify any non-compliance.	No non-compliances identified so far.	NA
6.5	A13	The notification must identify the development and the application number for it, set out the condition of consent that the development is non-compliant with, the way in which it	As above	NA

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		does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance		
6.6		Complaints Management		
6.7	B30	<p>Complaints and enquiries procedure</p> <p>The following must be made available for community enquiries and complaints for the duration of construction:</p> <ul style="list-style-type: none"> a) a toll-free 24-hour number for complaints and enquiries about the works; b) a postal address to which written complaints and enquiries may be sent; and c) an email address to which electronic complaints and enquiries may be transmitted. 	<p>Have an enquiries hotline in the signage outside the construction site. The sign also has an email address, however a postal address is not included. Suggest to consult with the client, decide whether this is necessary and take action accordingly.</p>	OFI-05
6.8	B31	<p>A Complaints Management System must be implemented, including a Complaints Register to be maintained recording information about all complaints associated with the project, e.g.</p> <ul style="list-style-type: none"> d) number of complaints received; e) number of people affected in relation to a complaint; f) nature of the complaint and means by which the complaint was addressed and whether resolution was reached, with or without mediation. 	<p>Have a Complaints Register, e.g.</p> <ul style="list-style-type: none"> - Complaint dated 4/07/2018 – various grievances from a neighbour (6 Derby Rd). - Concrete under a vehicle – other contractor, not for this site. - Vehicle accident - From Maternity Ward – loud music and foul language. Issue addressed with employees and subcontractors. 	Y
6.9		Incident Management		
6.10	A23, C28 A14	<p>The Department must be notified in writing to compliance@planning.nsw.gov.au within 24 hours after the Applicant becomes aware of an incident. The notification must identify the development (including the development application number and the name of the development if it has one), and set out the location and nature of the incident. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.</p>	No environmental incidents have been reported.	NA

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6.11	A24	<p>a) A written incident notification must also be emailed to the Department at the following address: compliance@planning.nsw.gov.au within seven days after the Applicant becomes aware of an incident. Notification is required to be given under this condition even if the Applicant forms the view that an incident has not occurred.</p> <p>b) Written notification of an incident must:</p> <ul style="list-style-type: none"> i) identify the development and application number; ii) provide details of the incident (date, time, location, a brief description of what occurred and why it is classified as an incident); iii) identify how the incident was detected; iv) identify when the Applicant became aware of the incident; v) identify any actual or potential non-compliance with conditions of consent; vi) describe what immediate steps were taken in relation to the incident; vii) identify further action(s) that will be taken in relation to the incident; and viii) identify a project contact for further communication regarding the incident. 	As above.	NA
6.12	C29	Within seven days of the detection of the incident, the Applicant must provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested in accordance with condition A 19.	As above	NA