

HEALTH INFRASTRUCTURE

Independent Environmental Audit (2nd) – Proponent review and response

SSD-35999468 Shoalhaven Hospital

11th April 2024

Declaration

This Proponent review and response has been prepared for NSW Health Infrastructure (HI) in response to an Independent Audit, including the recommendations and opportunities for improvement identified in the final Audit Report. The response to each of the audit findings is included as outlined in the *Independent Audit Post Approval Requirements (May 2020)*.

Declaration	
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Date:	11 th April 2024

Document Management, Tracking and Revision History

Version	Date	Author	Description	Reviewed by	Approved by
V1.2	26/03/2024	W.Wier	Independent Audit (2nd Audit – 26 week interval) – Proponent review and response	N.Arens	N.Arens
V1.3	11/04/2024	W.Wier	Independent Audit (2nd Audit – 26 week interval) – Proponent review and response – Amended Report	N.Arens	N.Arens

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1. Introduction

1.1 Project Application Number and Project Name

SSD-35999468 Shoalhaven Hospital

1.2 Site Address

Shoalhaven Hospital Redevelopment, Scenic Drive, Nowra, NSW, 2541

Lot 373	DP: 755952
Lot 1	DP: 1043088
Lot 1031	DP: 1208730
Lot 1302	DP: 1208730
Lot 102	DP: 1165533
Lot 104	DP: 1165533
Lot 7034	DP: 1031852

1.3 Project Contact Details

Proponent	NSW Health Infrastructure
Client Representative	John Staff
Contractor	John Holland Pty Ltd

1.4 Independent Auditor

NGH Pty Ltd

1.5 Independent Audit Date

30th January 2024

2. Proponent response

The Independent Audit Report No.V1.2 was prepared by W.Weir & reviewed by N.Arens, from NGH. The Audit Report dated 26th March 2024 was received on 26th March 2024 for an audit site inspection completed on 30th January 2024. The report has been amended with minor changes outlined below. The amended report is Audit Report No.V1.3 and was submitted 11.04.2024 and was prepared by W.Weir & reviewed by N.Arens, from NGH. The audit report has been reviewed and the response to the audit findings are listed in the below table.

In relation to non-compliances, 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.

Please note the below table contains a list of the 5 non-compliances of 158 conditions of approvals of these:

- 3 are new non compliances
- 2 ongoing non compliances from previous audits

Consent Condition No.	Requirement (exact wording from consent)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
A1	In addition to meeting the specific performance measures and criteria in this consent, all reasonable and feasible measures must be implemented to prevent, and, if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the development.		The site inspection identified significant hydrocarbon staining to bare ground at the filling point for the on-site diesel storage. In addition, several fuel containers (jerry cans) were observed without secondary containment. A random check of two oil products (SINOPEC LHM46 and SINOPEC TULUX T700) found that Safety Data Sheets were not held in the Chemical manifest. New		NC6	Clean up onsite has occurred, Additional bund created and spill kit located adjacent to re-fueling tank. CEMP updated to reflect management and toolbox talk undertaken to further explain requirements – No further action required
A2	The development may only be carried out: a) in compliance with the conditions of this consent;		The audit found NC's against consent Conditions as below, therefore the development has not been carried out in accordance with the full conditions of consent. Ongoing	Non-compliant	NC1	Complete actions complete below
A6	The applicant must comply with all relevant prescribed conditions of development consent under Part 4, Division 2 of the EP&A Regulation		Refer conditions A23, B1, B17 and C1 where the audit found administrative non-compliance findings with prescribed conditions of the development consent. Ongoing	Non-compliant	NC2	Complete actions complete below
A23	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, approved or provided) publicly available on its website (i) Documents referred to in condition A2 of this consent (ii) All current statutory approvals for the development (iii) All approved strategies, plans and program required under the conditions of this consent (iv) Regularly reporting on the environmental performance of the development in accordance with the reporting arrangement in any plans or programs approved under the conditions of this consent (v) A comprehensive summary of the monitoring results of the development,		The requirements listed in A23 (a) (i), (ii),(iii), (iv), (v), (vi), (vii) were not found on the applicants website at the time of the audit site inspection New	Non-compliant	NC3	The Applicant is to provide requisite information on its website in accordance with the requirements of this condition. The auditor also suggests that provision of information needs to be simplified to make it easier for the community to access information

Consent Condition No.	Requirement (exact wording from consent)	Evidence Collected	Independent Audit Findings and Recommendations	Compliance Status	Unique Identification on Noncompliance	Proponent Response & Timing
	<p>reported in accordance with the specification in any conditions, reported in accordance with the specifications in any conditions of consent, or any approved plans and programs</p> <p>(vi) Contact details to enquire about the development or to make a compliant</p> <p>(vii) A complaints register, updated monthly</p>					
A27	The Planning Secretary must be notified through the major projects portal within seven days after the Applicant becomes aware of any non-compliance. The Certifier must also notify the Planning Secretary through the major projects portal within seven days after they identify any non-compliance.		Non-compliances from the First Audit were not notified to the Planning Secretary within 7 days of them being identified. New		NC7	No further Action – Ensure notification of audit non-compliance findings are notified within the requisite timeframe