

ENARES Pty Ltd
c/- Ethos Urban
173 Sussex Street
Sydney NSW 2000
Attention: Chris Forrester

Delivery by email: cforrester@ethosurban.com

Dear Chris

Re: Interim Audit Advice No.2 - Gladesville Bridge Marina Development, Response to NSW EPA Correspondence

As a NSW Environment Protection Authority (EPA) accredited Contaminated Sites Auditor, I am conducting an Audit in relation to the subject site.

This interim advice has been prepared to supplement my Interim Audit Advice No. 1 dated 8 May 2020 (IAA No. 1) and responds to a request for additional information from the NSW EPA in letter to City of Canada Bay Council dated 23 February 2021 (DOC20/831221-10). To support this request, I have been provided with the following additional information by Ethos Urban on behalf of Gladesville Bridge Marina (GBM):

- 'Gladesville Bridge Marina Refurbishment Project – Marine Sediment Environmental Management Plan', 27 August 2020, Marine Pollution Research Pty Ltd (*the Marine Sediment EMP*)
- Email advice from Ethos Urban dated 1 April 2021.

My responses to the request for additional information are provided below.

Confirmation that the slipway is to be retained:

I have been advised in the email dated 1 April 2021 that only the slipway rails are to be removed, with the concrete slipway remaining. Therefore, the conclusions IAA No. 1 remain valid.

Whether the Marine Sediment EMP is appropriate for the ongoing management of the sediments:

I have reviewed the Marine Sediment EMP and am of the opinion that the proposed management controls are reasonable for the ongoing management of sediments. However, an additional control to prevent disturbance of sediments through future construction or other activities is required. Where disturbance cannot be avoided a process for assessing and managing the task specific risks is required. Typically, this would involve engaging an appropriate expert such as an environmental consultant and/or ecologist to provide advice. Similarly, the Marine Sediment EMP should also include an unexpected finds protocol. There is also potential for risk from dermal absorption of contaminants. This should be acknowledged. However, the proposed controls would be reasonable to address this pathway.

The Marine Sediment EMP should also include:

- Site plan clearly defining the area that requires management

Date 9 April 2021

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Project No. 318000976

- A summary of the nature and location of the contamination
- A summary of the management structure and clear definition of responsibilities and responsible parties
- Details of how the plan will be incorporated into the site management system
- Reporting requirements in relation to assessing and managing the task specific risks or unexpected finds
- Communication protocols
- Emergency contacts
- Schedule for review of the plan.

The following is also required:

- Agreement by the site owner to implement the plan
- An appropriate public notification mechanism such as placing a covenant on the title of land
- An enforcement mechanism (such a condition of consent).

It is recommended that the EMP be updated to address the matters above and that a Section B2 Site Audit Statement and Site Audit Report be prepared prior to Construction Certificate.

Implementation of the EMP should also be included as a condition of the development consent to ensure enforceability.

Subject to a condition of consent requiring a SAS reviewing the EMP, and its implementation, I am satisfied that contaminated sediments can be appropriately managed.

Whether the sediments will be appropriately managed during the construction phase. This will involve the Auditor providing comments on the following documents:

- **The Preliminary CEMP**
- **Construction Environmental Management Plan**
- **Marine Sediment EMP**
- **Sediment and Erosion Control Plan**

The Preliminary CEMP was reviewed for IAA No. 1 and conclusions of that document remain valid. The Marine Sediment EMP is discussed above. I understand a full CEMP including Sediment and Erosion Control Plan, will be prepared prior to Construction Certificate.

A condition of consent requiring my review of aspects that relate to a Contaminated Sites Audit prior to construction would ensure this was completed. Subject to such a condition, I am satisfied that contaminated sediments can be appropriately managed during construction.

* * *

Consistent with the NSW EPA requirement for staged 'signoff' of sites that are the subject of progressive assessment, remediation, and validation, I advise that:

- This advice letter does not constitute a Site Audit Report or Site Audit Statement.
- At the completion of the remediation and validation I will provide a Site Audit Statement and supporting documentation.
- This interim advice will be documented in the Site Audit Report.

Yours faithfully
Ramboll Australia Pty Ltd

A handwritten signature in black ink, appearing to read 'Tom Onus', with a long horizontal stroke extending to the right.

Tom Onus
NSW EPA Accredited Auditor 1505

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