

Sydney Zoo 2024 Environmental Audit

Kiersten Fishburn
Secretary Department of Planning, Housing and Infrastructure
4 Parramatta Square,
12 Darcy Street Parramatta NSW 2150

Attention: Sally Munk, Principal Planner, Industry Assessments

Dear Sally,

Subject: Sydney Zoo 2024 Environmental Audit.

Sydney Zoo has recently conducted an environmental audit as required under conditions D11 and D12 of our development consent. The date of completion of the audit was 11 June 2024.

The audit highlighted some areas of non-compliance. This letter provides response to the non-compliance issues, and where appropriate, outlines the proposed rectification actions and timing. Responses to the provided recommendations from the audit are provided in **Table 1**, with **Table 2** outlining responses to the Recommendations and Opportunities for Improvements. Please refer to Appendix A of this letter for full details.

Table 1: Audit specific recommendations

Auditor Reference	Item	Recommendation	Sydney Zoo Response
G106	Environmental Audit	The next Operation Audit shall be completed within 3 years from the issue of this final report.	The late audit is the subject of this report. We will commence on time for future audits and enable time for these to be prepared.
G200	Work Place Travel Plan	Workers travel surveys should be conducted to determine if the objectives of the Work Place Travel Plan are being met, or this requirement should be removed from the Work Place Travel Plan.	Workers travel survey to be completed by 30 September 2024. If necessary, WPTP to be updated to reflect survey outcomes/remove survey requirement
G214	Waste management tracking – clinical waste tracking	The Zoo should ensure that waste collector complies with the Environment Operations (Waste) Regulation 2014 and tracking document is retained for 4 years	Sydney Zoo are currently changing waste contractors. Waste tracking processes and procedures to be

Auditor Reference	Item	Recommendation	Sydney Zoo Response
			implemented by 3 September 2024.
G219	Waste management tracking – animal carcass and cytotoxic waste	Disposal records for all waste (including animal carcasses) should be retained in file	See above.
G220	Clinical waste tracking and Consignment authority and waste transport certificate	Consignment authority and waste transport certificate must be retained for a period of 4 years. Waste collector must comply with the Environment Operations (Waste) Regulation 2014	See above.
G228	Biodiversity Management Plan and Cumberland Plain Management Plan (BMP and CPWMP) Monitoring	An Updated Biodiversity Management Plan and Cumberland Plain Woodland Management Plan should be prepared, which provides a updated management requirements and the responsibilities for Sydney Zoo and the WSPT.	An updated Biodiversity Management Plan and Cumberland Plain Management Plan is to be completed by 31 December 2024.
G229	Aboriginal cultural experience strategy	The Aboriginal Cultural Experience Strategy should be reviewed to confirm the updated strategy and any revision must be submitted to the Planning Secretary.	Sydney Zoo are to seek a modification to the SSD consent to amend the relevant condition of consent to remove the mention of Muru Mittigar. An update to the ACES will also be completed and sit within the OEMP.

Table 2: Recommendations and Opportunities for Improvements

Auditor Recommendation	Sydney Zoo Response
Administrative	
A copy of this IEA and the Zoo's response must be uploaded to the public website following completion of this IEA.	This IEA and Response Document will be made available on the Sydney Zoo website.
The subsequent Independent Environmental Audit should be completed within three years of the completion of the current audit.	The next Audit will be carried out in early 2027 with completion by mid-2027.
The current induction material is considered to provide high level requirements for the implementation of the SSD Conditions. It would be prudent to update the induction material to include the information as per SSD requirements.	Noted. The induction material will be updated as required based on the information within the Audit.
Reports and Annual report requirements	
Subsequent annual reports should include all the items listed in this condition and should be prepared in accordance with the Compliance Reporting Post Approval Requirements (Department 2020) (CRPAR) https://www.planning.nsw.gov.au/assess-and-regulate/aboutcompliance/inspections-and-	Noted. The current 2024 Annual Report is commencing preparation and will follow this format including all conditions of consent for compliance confirmation.

Auditor Recommendation	Sydney Zoo Response
enforcements/compliance-reporting-post-approval-requirements).	
The subsequent annual report should include items to address energy, water efficiency, electric vehicles travel distance and the annual stocktake of dangerous goods.	Noted. The 2024 Annual Report will address these items.
OEMP and sub-plans	
OEMP review be conducted biannually as per the OEMP requirements and considers guest comments, agency input or response from DPHI , maintenance. operational activity details, environmental monitoring outcomes, incidents and non-conformances, changes in organisation structure and responsibilities, changes in standards and legislation and changes in relevant sub-plans.	An OEMP review is due to commence shortly and be completed by the end of 2024 with updates to sub-plans as required.
Revised plans should be submitted to the Planning Secretary for approval.	Noted.
The Aboriginal Cultural Experience Strategy should be reviewed to confirm the updated strategy and any revision must be submitted to the Planning Secretary.	An update to the ACES will also be completed and sit within the OEMP.
The Waste Management Plan should be reviewed to ensure relevancy.	The WMP will be reviewed.
The Bushfire Risk Management Plan should be updated include evacuation routes, firefighting protocols and hydrant locations, so the document can be a standalone document.	The BRMP will be reviewed and updated as required.
The Community Consultation and Engagement Plan must be updated to reflect the requirement for the operational phase only.	The Engagement Plan will be reviewed and updated to reflect operation only noting construction has been completed.
An Updated Biodiversity Management Plan and Cumberland Plain Woodland Management Plan should be prepared, which provides an updated management requirements and the responsibilities for Sydney Zoo and the Western Sydney Parklands Trust .	These are being reviewed to address the commentary from the WSPT in relation to management responsibilities.
Implementation of OEMP & Subplans	
Sydney Zoo should inform DPHI on the EPA's advice that water monitoring is no longer required. The DPHI advice will be required on the cessation of the Water Quality Monitoring Program for the site.	Noted. This advice from the EPA will be provided to DPHI to identify the pathway forward and a modification to the SSD submitted to address any changes.
Observation of imported materials should be recorded on the potential presence of asbestos for future material importation. It may be prudent to also conduct asbestos testing to ensure the material does not contain asbestos.	Noted.
Should any soil material be imported for filling purpose, a register should be prepared to keep these records.	A register will be kept if required.
Any sighting of threatened species should be reported to OEH Atlas of NSW Wildlife.	Noted.

Auditor Recommendation	Sydney Zoo Response
The Zoo should ensure that waste collector complies with the Environment Operations (Waste) Regulation 2014 and tracking document is recorded and filed.	Sydney Zoo are currently changing waste contractors. Waste tracking processes and procedures to be implemented by 3 September 2024.
Disposal records for all waste (including animal carcasses) should be retained in file. Consignment Authority and waste transport certificate must be retained for at least 4 years.	Sydney Zoo are currently changing waste contractors. Waste tracking processes and procedures to be implemented by 3 September 2024.
Waste bins or storage area adjacent to the administration building should be kept inaccessible to public, e.g. through the use of bin locks or lockable gates.	Noted. Sydney Zoo will look to address.
The zoo should continue to increase the Aboriginal employment at the zoo in line with the Zoo OEMP target and consider including the relevant Aboriginal stakeholders in the annual review of Aboriginal Heritage Experience Strategy.	Noted. Sydney Zoo will review the ACES to identify how this can progress and update the OEMP as required.
Consignment Authority and waste transport certificate must be retained for a period of 4 years.	Sydney Zoo are currently changing waste contractors. Waste tracking processes and procedures to be implemented by 3 September 2024.
Workers travel surveys should be conducted to determine if the objectives of the Work Place Travel Plan are being met, or this requirement should be removed from the Work Place Travel Plan.	Workers travel survey to be completed by 30 September 2024. If necessary, WPTP to be updated to reflect survey outcomes/remove survey requirement

Sincerely,



Jake Burgess

Appendix A
Sydney Zoo Environmental Audit

SSD7228 Consent Condition Non-Compliance Responses

Auditor Reference	SSD Condition No	Requirement	Condition	Auditors Evidence	Auditors Comment	Sydney Zoo Response	Sydney Zoo Timeframe
G71	C32B	Noise Verification Report	<p>Within six months of the commencement of operation of the Development the Applicant must prepare a Noise Verification Report for the Development to the satisfaction of the Planning Secretary. The report must:</p> <p>a) be prepared by a suitably qualified acoustic consultant, with qualifications and experience consistent with the technical eligibility criteria for membership to the Association of Australian Acoustical Consultants or the Australia Acoustical Society;</p> <p>b) be prepared in consultation with Council;</p> <p>c) include an analysis of compliance with the noise limits specified in Condition C32 for all activities specified in Condition B10;</p> <p>d) include an outline of management actions to be taken to address any exceedances of the limits specified in Condition C32; and</p> <p>e) describe contingency measures in the event management actions are not effective in reducing noise levels to an acceptable level.</p>	<p>Record sighted:</p> <ul style="list-style-type: none"> - RWDI Australia (21 June 2022 revised on 6 July 2022) Sydney Zoo Glow Event – Noise Verification Report. "Conclusion: RWDI has prepared a Noise Verification Report to confirm that the operations of Sydney Zoo is compliant with the noise conditions of Approval (SSD 7228), specifically Conditions C32, C32A, C32C, and C32D. This Noise Verification Report was completed following the operation of a temporary and community evening (GLOW Light Festival 2022) as per Condition C32C-a. - Wilkinson Murray (5 July 2022) Sydney Zoo - Noise Verification Report. Report concluded that " This Noise Verification Report has been completed to satisfy Condition 32A of the Conditions of Consent. Sydney Zoo submitted this report to Blacktown City Council for review. The report was deemed appropriate by Blacktown City Council on 5 July 2022." - Department of Planning and Environment (12 August 2022) The Sydney Zoo (SSD-7228) Revised Noise Verification Report. ' The Department has reviewed the revised Report and considers it to generally satisfy Condition C32B, Schedule C of the Consent." 	<p>This item was considered as non-compliant by the Planning Secretary because "consultation with Blacktown City Council did not occur until 14 July 2020, after submission of the initial Report to the department on 28 May 2020. This is non-compliant with Condition C32B(b) of the Consent which requires that the report must be prepared in consultation with Council. The non-compliance has been assessed in accordance with the department's Compliance Policy. On this occasion, the department has determined to record the breach with no further enforcement action."</p>	<p>Sydney Zoo notes this. No further action required.</p>	<p>Not applicable.</p>
G72	C32C	Noise Verification Report	<p>A Noise Verification Report must be submitted to the satisfaction of the Planning Secretary at the following stages of the Development:</p> <p>a) within three months of the conclusion of the Sydney Zoo Light Festival 2021 event held at the site in July and August 2021 or an equivalent temporary and community event agreed to by the Planning Secretary; and</p> <p>b) within three months of the conclusion of the first twilight concert event held at the site.</p>	<p>Record sighted:</p> <ul style="list-style-type: none"> - RWDI Australia (6 July 2022) Sydney Zoo Glow Event – Noise Verification Report. "Conclusion: RWDI has prepared a Noise Verification Report to confirm that the operations of Sydney Zoo is compliant with the noise conditions of Approval (SSD 7228), specifically Conditions C32, C32A, C32C, and C32D. This Noise Verification Report was completed following the operation of a temporary and community evening (GLOW Light Festival 2022) as per Condition C32C-a. - The Planning Secretary (1 August 2022) Noise Verification Report – Sydney Zoo Glow Festival (SSD-7228, as modified). The Department has reviewed the Noise Verification Report and was satisfied the document satisfied the requirements of conditions C32C(a) and C32D of the consent. <p>Interview:</p> <ul style="list-style-type: none"> - No Noise Verification Report was not conducted following the first twilight concert. The Zoo advised that it is unlikely to repeat the concert as it was not lucrative. 	<p>This item is considered non-compliant because Noise Verification Report was not conducted within three months of the first twilight concert. However, it is noted no complaint was recorded for the first twilight concern that that a noise verification had been conducted since then. No recommendation was made based on the outcome of the RWDI (6 July 2022) noise verification report.</p>	<p>A Noise Verification report will be prepared for the next twilight concert (no timing for this to occur), noting no complaints were received. If necessary, a modification to the SSD consent to adjust this condition will be prepared.</p>	<p>Mid-2025</p>

Auditor Reference	SSD Condition No	Requirement	Condition	Auditors Evidence	Auditors Comment	Sydney Zoo Response	Sydney Zoo Timeframe
G106	D11	Auditing	<p>Within two years of the date of this consent, and every three years thereafter, unless the Planning Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. The audit shall:</p> <p>a. be conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Planning Secretary;</p> <p>b. include consultation with the relevant agencies;</p> <p>c. assess the environmental performance of the Development and assess whether it is complying with the requirements of this consent and any other relevant approvals (including any assessment, plan or program required under these approvals);</p> <p>d. review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and</p> <p>e. recommend measures of actions to improve the environmental performance of the Development, and/or strategy, plan or program required under these consents.</p> <p>Note: This audit team shall be led by a suitably qualified auditor and include relevant experts in any other fields specified by the Planning Secretary.</p>	Zoo was opened in December 2019. Last Audit was completed on 14 Feb 2020. This Audit was not completed in accordance to IAPAR 2020 not 2018.	<p>This item is considered as non-compliant because this Operational Audit was not completed within 3 years of previous audit, to meet this requirement.</p> <p>It is understood that Sydney Zoo has consulted with DPHI on the late commencement of the Audit.</p>	The late audit is the subject of this report. We will commence on time for future audits and enable time for these to be prepared.	To be completed in early 2027, and submitted in June 2027 (3 years post-this audit report date of 11 June 2024)

OEMP and Sub Plan Non-Compliance Responses

Auditor Reference	Management Plan	Section	Condition	Auditors Evidence	Auditors Comment	Sydney Zoo Response	Sydney Zoo Timeframe
G200	Work Place Travel Plan (WPTP)	4 (Table 6) Annual survey	Conduct travel surveys via an online survey emailed to all workers to determine if the objectives of the Work Place Travel Plan are being met.	Interview: - Zoo (PT) stated that there is no formal survey conducted.	<p>This item is considered as non-compliant as formal worker travel survey has not been conducted.</p> <p>Recommendation: Workers travel surveys should be conducted to determine if the objectives of the Work Place Travel Plan are being met, or this requirement should be removed from the Work Place Travel Plan.</p>	Workers travel survey to be completed by 30 September 2024. If necessary, WPTP to be updated to reflect survey outcomes/remove survey requirement	30/09/2024 End 2024
G214	Waste management plan (WMP)	Section 6.9.5	Waste pharmaceuticals, drugs & medicines & various waste chemicals, and cytotoxic wastes, identified by the EPA in Table 1 of their "Waste Tracking Fact Sheet – waste that must be tracked" must be tracked when transported within NSW or interstate, unless subject to certain exemptions	This item is considered as non-compliant because clinical waste tracking documents could not be sighted. Noting that tracking of clinical waste is required by the protection of the environmental operations (waste) regulation 2014. It is noted that a few Med-X service dockets for Clicks for clinical waste disposal were provided and the Zoo is in the process of changing waste contractor	The Zoo should ensure that waste collector complies with the Environment Operations (Waste) Regulation 2014 and tracking document is retained for 4 years	Sydney Zoo are currently changing waste contractors. Waste tracking processes and procedures to be implemented by 3 September 2024	3/09/2024
G219	Waste management plan (WMP)	Section 6.12	Records should be kept of all animal carcass disposals and cytotoxic waste movements	This item is considered as non-compliant because disposal records of animal carcasses could not be sighted	Disposal records for all waste (including animal carcasses) should be retained in file	See above	3/9/2024 and ongoing
G220	Waste Management Plan (WMP)	Section 6.12.1	Clinical and related wastes will need to be tracked in accordance with EPA requirements, unless subject to certain exemptions. A consignment authority (CA) is required for waste tracking purposes and subject to approval by the EPA. A copy of each waste TC (transport certificate) must also be retained for a period of 4 years	This item is considered as non-compliant because clinical waste tracking documents, consignment authority, and waste transport certificate could not be sighted. It is noted that the zoo is in the process of changing waste contractor.	Consignment authority and waste transport certificate must be retained for a period of 4 years. Waste collector must comply with the Environment Operations (Waste) Regulation 2014	See above	3/9/2024 and ongoing
G228	Biodiversity Management Plan and Cumberland Plain Management Plan (BMP and CPWMP)	Section 6, Monitoring, reporting and review	Monitoring will be undertaken at the following intervals: - At the beginning (baseline) and end of the establishment period - Annually every year during the maintenance period until the completion of management works	Interview: - Zoo (PT) stated that they conducted bush trimming previously but was advised by Council to stop. - Zoo (PT) stated that WSPT (Western Sydney Parklands Trusts) advised that they wanted to take over the care of the subject site and this is an ongoing process. Zoo request that this recommendation be removed.	This item is considered non-compliant as the monitoring report required by the Biodiversity Management Plan and Cumberland Plain Woodland Management Plan has not been conducted. However, it is noted a	An updated Biodiversity Management Plan and Cumberland Plain Management Plan is to be completed by December 31 st 2024.	End 2024

Auditor Reference	Management Plan	Section	Condition	Auditors Evidence	Auditors Comment	Sydney Zoo Response	Sydney Zoo Timeframe
			<p>The ER will undertake monitoring and provide monitoring reports and assessments against the performance criteria, with the Bush Regeneration contactor to provide progress reports describing works undertaken.</p> <p>Progress reports are to be provided to the ER for inclusion within the monitoring reports. Progress reports are to be provided at each monitoring reporting period.</p> <p>Blacktown Council have requested that they be forwarded annual monitoring reports</p> <p>At the conclusion of the five years of maintenance, a new management plan will be required to update this plan. This should be prepared by a suitably qualified restoration ecologist. The site is to be managed in perpetuity and management plans should be renewed every five years.</p>	<p>Record sighted: - The Western Sydney Parklands Trusts (WSPT) email (24 February 2022) states that WSPT to undertake bushland management throughout the Bushland Area</p>	<p>correspondence by Western Sydney Parklands Trusts was sighted that confirms that the WSPT would take over the bushland management.</p> <p>Recommendation: An Updated Biodiversity Management Plan and Cumberland Plain Woodland Management Plan should be prepared, which provides a updated management requirements and the responsibilities for Sydney Zoo and the WSPT.</p>		
G229	Aboriginal cultural experience strategy (ACES)	Summary of Aboriginal cultural experience commitments	<p>Muru Mittigar will establish an Aboriginal Advisory Group for Sydney Zoo. This group will provide Muru Mittigar and Sydney Zoo with expert advice on the Darug Cultural Experience, cultural tourism, Aboriginal pre-employment, traineeship and employment opportunities</p> <ul style="list-style-type: none"> Muru Mittigar will establish an Aboriginal Advisory Group for Sydney Zoo. This group will provide Muru Mittigar and Sydney Zoo with expert advice on the Darug Cultural Experience, cultural tourism, Aboriginal pre-employment, traineeship and employment opportunities The Darug Cultural Experience will be developed by Muru Mittigar to guide and direct the visitor experience at Sydney Zoo. Signage and graphical interpretation will be developed by Muru Mittigar in partnership with recognised Darug and other Aboriginal artists from Western Sydney. Darug and other Aboriginal stories and information will be imparted to a range of visitors (including school age, overseas, and local) Muru Mittigar in partnership with Western Sydney Institute of TAFE will establish a pre-employment program that will support Aboriginal job seekers to be both job ready, and aware of culture and mainstream job opportunities at Sydney Zoo Muru Mittigar will establish a paid traineeship program for culture based work development at Sydney Zoo. This program will utilise Certificate III courses in Tour Guiding, Indigenous Land Management and Facilitation and Coordination Muru Mittigar will employ full time Cultural Educators and other Culture contractors at Sydney Zoo to deliver the Darug Cultural Experience and other culture based content at Sydney Zoo. All employment and contracting will be open and merit based Sydney Zoo also undertakes to employ qualified Aboriginal people in mainstream based positions utilising the Muru Mittigar/WSI TAFE pre employment program Under the Darug Cultural Experience, Muru Mittigar will develop and then deliver an interactive 	<p>This condition is considered non-compliant because a few items that need to be completed by Muru Mittigar could not be completed as Muru Mittigar were terminated because they were unable to continue to provide the required service of employing staff on zoo behalf.</p> <p>Observation: - Heritage interpretive information observed near the entrance of the zoo is in a good condition.</p> <p>Written advice: - Zoo (PT) states that "the relationship with Muru Mittigar has been terminated as they were unable to continue to provide the required service of employing on our behalf and we now employ for our targeted roles directly. . In relation to traineeships, this was terminated with the contract with Muru Mittigar, however, Sydney Zoo offers traineeships under our partnership with WSU. WSU also provides a program where up to 400 students come to Sydney Zoo for an immersive aboriginal cultural program." Record Sighted: - Darug Cultural or Educational Experience at the site (website access on 17 May 2024: https://sydneyzoo.com/education/excursion-early-childhood/) - Zoo (PT) stated that the zoo has a "tick box" for employees to indicate whether they are indigenous, however, that "tick box" is not compulsory for staff to check. As a result it, is difficult to know what level of positions are filled by people who identify as indigenous across all departments. However, the Zoo's estimation was that they did not have 20-30 staff who would identify as indigenous. Sydney Zoo has 8 targeted aboriginal rangers employed at Sydney Zoo – these Rangers deliver educational programs to all Sydney Zoo visitors – International Markets, Schools etc.</p> <p>Record Sighted: - Aboriginal Cultural Programs Strategy. The strategy reviewed the 2022 year and set new strategies for 2023.</p>	<p>Should be reviewed to confirm the updated strategy and any revision must be submitted to the Planning Secretary</p> <p>This condition is considered non-compliant because a few items that need to be completed with Muru Mittigar could not be completed as Muru Mittigar were terminated because they were unable to continue to provide the required service of employing on zoo behalf.</p> <p>Recommendation: The Aboriginal Cultural Experience Strategy should be reviewed to confirm the updated strategy and any revision must be submitted to the Planning Secretary.</p>	<p>Sydney Zoo are to seek a modification to the SSD consent to amend the relevant condition of consent to remove the mention of Muru Mittigar. An update to the ACES will also be completed and sit within the OEMP.</p>	Mid-2025

Auditor Reference	Management Plan	Section	Condition	Auditors Evidence	Auditors Comment	Sydney Zoo Response	Sydney Zoo Timeframe
			cultural education program for a range of visitors at Sydney Zoo.				

Recommendations from Previous Audits

3.5 Assessment from Previous Audits

There is no previous Operation Audit for the site. Details of recommendations from the previous Construction Audit considered relevant to the operational phase and how they were addressed are provided in Table 3.4

Table 3.4 Assessment of Previous Audits

Recommendation from previous audit	How the recommendations have been addressed	Auditors assessment	Sydney Zoo Response
Documentations to satisfy SSD conditions and CEMP were not readily available for review during the audit. The auditor recommends that applicable documents to demonstrate the relevant SSD conditions and OEMP be collated to assess compliance during the operation phase. This should include, but not limited to: * documents relating to environmental management system of the zoo, * any other documents to demonstrate compliance to OEMP (eg. Training records, induction records, complaints register, compliance records, corrective actions, incident records, equipment maintenance records, etc)	The majority of documents required for the current audit were available to be sighted	The Auditor considers that the zoo generally has an adequate record keeping approach to demonstrate compliance to audit. It is noted that the majority of the non-compliances were associated with the unavailability of waste documents, which are managed by third party contractors. Recommendations were made in table 3.3 to ensure that the new waste disposal contractor will provide the records to the Zoo.	Noted
Demonstration of effectiveness of mulching as sediment and erosion control will be required at subsequent audits	During the site audit, sediment fencing was observed to be installed on part the site fence at the back of the site. No unacceptable sediment runoff was observed, noting that the grass outside the fence was observed to be overgrown.	The auditor considers this item has been addressed	Noted.
The unpaved surfaces in the north-eastern part of the site (near sedimentation pond) are to be sealed/paved.	Compacted dirt road was observed during the site audit but no notable dust observed given the movement in the area was minimal	Sydney zoo should consider sealing the surface if excessive dust is observed during the dry weather	Noted. This will be monitored.
The sealing of the public pathways be maintained	The sealing of public pathways was observed to have been maintained	The auditor considers this item has been addressed	Noted. No action required.
The Auditor makes the following recommendations of the CES (18 December 2017) Proposer Water Quality monitoring programme, which will be implemented for the operational phase: * The WQMP requires water to be compared against ANZECC (2000) trigger levels, which are appropriate for assessment of suitability for discharge. Should this water be reused onsite (such as for irrigation) the Auditor recommends that the water be compared against appropriate criteria dependent on the proposed uses as determined by the appropriate environmental consultant. It is recommended that E. coli be added to the list of analytes	Not assessed. The zoo considers that this item is not relevant to the Operational Audit scope because the Zoo no longer conducted water monitoring as EPA states that EPA does not have an ongoing regulatory role and EPA decided that they will not provide any further comments on the water quality program or assessment. Furthermore, the Zoo stated that the Zoo does not discharge water as water is full reticulated via dam & treatment pond. The only possible water discharged is during a heavy rain event, which has not occurred.	Sydney Zoo should inform DPHI on the EPA's advise so that water monitoring is no longer required. The DPHI advise will be required on the cessation of this Water Quality Monitoring Program.	Noted – this advice is to be provided to the DPHI and a modification to the SSD consent and CES is to be prepared by Mid-2025.
As recommended by Toolijooa (November 2019) installation of additional nest boxes (to a total of 17) will be checked in future audit	The zoo provided photographic evidence of 17 nest boxes	The Auditor considers this item is has been addressed	Noted. No action required.

3.6 OEMP, Sub-plans and Post Approval Documents:

The Auditor considers that the OEMP and sub-plans are appropriate for the operational phase to minimise environmental impact, noting that:

* The incident form provided to OEMP Rev E Appendix P could be improved by also including;

- Incident that causes or threatens material harm to the environment, including but not limited to chemical spills such as fuel, cleaning chemicals, or other chemical stored on site.

- Incident that relates to the biophysical environment (soils, plants, and animals) such as but not limited to wastewater/dam/pond run-off to adjacent areas, rubbish overflow or carried over by wind/water.

- Register of exceedance of the limits or performance criteria in site development consent (opening hours, number of community events per year, noise limit, unlawful disposal or importation of materials)

* The community consultation and engagement plan should be updated to reflect the requirement for the operational phase only.

* OEMP and sub-plans should be reviewed on a regular bases, or if there is change to the mitigation or management procedure, to ensure relevancy.

Noted. The OEMP will undergo a review and be updated as needed.

Timing: by end 2024