

27 October 2025

AW Edwards Pty Limited
Level 12, 558 Pacific Highway
St Leonards NSW 2065
Attn: Giovanni Strati

By email: gstrati@awedwards.com.au

Dear Giovanni,

**RE: INTERIM AUDIT ADVICE LETTER NO. 2 - SSD-9741-MOD-3
(CONDITIONS B1, B2, B3), STAGE 2, AIRTRUNK SYD2 CAMPUS, LANE
COVE**

Ramboll Australia Pty Ltd
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North Sydney NSW 2060

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Ref: 318002417

Audit Number: TO-060A

1. INTRODUCTION

1.1. Background and Objective

As a NSW Environment Protection Authority (EPA) accredited Contaminated Sites Auditor, I am conducting an Audit (TO-060A) under the NSW *Contaminated Land Management Act 1997* (CLM Act) in relation to 1 Sirius Road, Lane Cove West (**Attachment 1**).

The site is being developed as a data centre (AirTrunk SYD2 Campus) in two stages (**Attachment 2**). Development of Stage 1 has been completed and signed-off by a previous Site Audit (TO-060A-1). This stage of the Audit relates to development of Stage 2 (TO-060A-2).

I have previously prepared:

- Section B Site Audit Statement (SAS) no. TO-060 and supporting Site Audit Report (SAR) (20 August 2019) endorsing the approved remediation action plan (RAP) for the site (**the TO-060 Audit**)
- Section A1 SAS no. TO-060A-1 and supporting SAR (25 June 2021) confirming the suitability of Stage 1 for the proposed use (**the TO-060A-1 Audit**)
- Interim Audit Advice no. 1 'Interim Environmental Management Plan, 1 Sirius Road, Lane Cove West' (23 March 2022) endorsing the interim environmental management plan (Interim EMP) as suitable and providing appropriate processes and procedures for the management of contaminated material capped within the Stage 2 area of the site (**IAA #1**).

Ramboll Australia Pty Ltd
ACN 095 437 442
ABN 49 095 437 442

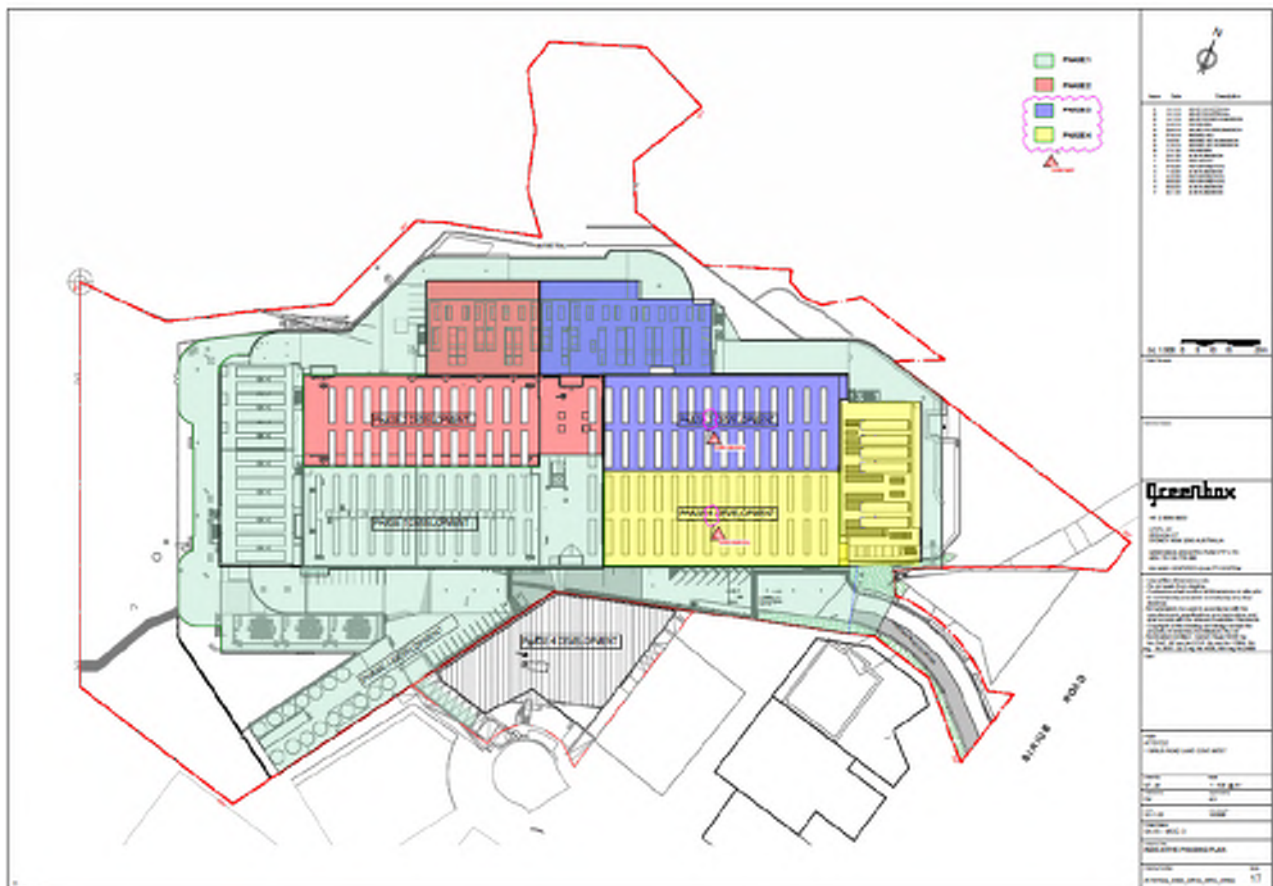
The approved RAP has been implemented across both Stage 1 and Stage 2. However, currently only Stage 1 has been signed off for the proposed use (TO-060A-1). It is anticipated that the remediation and validation of Stage 2 will be reviewed for the current TO-060A-2 Audit.

The northern portion of Stage 2 contains a capped uncontrolled landfill (**Attachment 3**) as well as capped site-won asbestos impacted fill (**Attachment 4**) that was placed in this area during remediation of Stage 1. The Interim EMP (endorsed in IAA #1) was prepared to manage the post-remediation capped landfill and asbestos material and requires an Asbestos Management Plan (AMP) and Construction Environmental Management Plan (CEMP) to be prepared to manage any works that penetrate the cap.

The NSW EPA regulates the capped area through Ongoing Maintenance Order no. 20212810 and AirTrunk as the owner of the site have obligations under the order, including that the site is managed in accordance with the Interim EMP.

Construction was to be completed in four phases as shown on **Figure 1.1** under State Significant Development approval SSD-9741-Mod-3 dated 13 June 2024 (the SSD).

Figure 1.1: Construction Phases



Construction of structures within Phases 1 and 2 was completed during Stage 1. Structures within Phase 3 have been completed and it is understood an AMP and CEMP were implemented during these works, however, these were not reviewed by the Auditor prior to works being undertaken.

AW Edwards Pty Limited (AW Edwards) is soon commencing Phase 4 which includes construction of Shell C and the eastern gantry (shown as yellow on **Figure 1.1** and as blue and green on **Attachment 6**).

Conditions B1 to B8 of the SSD relate to the Audit. This IAA has been prepared to address Condition B1 to B3 as follows:

Site Auditor

B1. Prior to the commencement of any earthworks or remediation works on site, the Applicant must engage a Site Auditor accredited under the Contaminated Land Management Act 1997 NSW Site Auditor Scheme.

Remedial Action Plan

B2. Prior to the commencement of any earthworks or remediation on site, the 'Remedial Action Plan, 1 Sirius Road, Lane Cove West, NSW' prepared by Senversa, dated 14 August 2019 (Revision 5) [the approved RAP] must be reviewed and, where required, amended to address any requirements of the Site Auditor.

B3. Prior to the commencement of any earthworks or remediation on site, the Site Auditor must provide written advice to the Planning Secretary confirming the site is capable of being made suitable for the proposed development with the implementation of the final remediation approach.

The approved RAP and TO-060 were prepared prior to the approval of the SSD in anticipation of the consent conditions. TO-060 endorses the approved RAP and would be considered by the Auditor to be adequate to address Conditions B1, B2 and B3.

AW Edwards has now provided the AMP and CEMP for review in relation to Phase 4 (construction for Shell C and the eastern gantry). This Interim Audit Advice no. 2 (IAA #2) has been prepared to review the CEMP and AMP in relation to Shell C and the eastern gantry (Phase 4) considering Conditions B1 to B3.

The Audit will ultimately be conducted for the purpose of certifying the suitability of Stage 2 for its intended use (to address Condition B5). The Audit is required by the SSD and is therefore a statutory audit.

1.2. Scope of Audit

The scope of IAA #2 includes:

- Reference to and reliance on the TO-060 Audit and reference to the reports on which it was based:
 - 'Geotechnical Assessment, Proposed Industrial Subdivision, Lot 2 DP884454, Sirius Road, Lane Cove, NSW', 4 April 2006, Environmental Investigations Australia Pty Ltd (EIA)
 - 'Environmental Site Assessment, 1 Sirius Road, Lane Cove, NSW', 3 July 2006, EIA
 - 'Remedial Action Plan, 1 Sirius Road, Lane Cove, NSW', 31 January 2007, EIA
 - 'Phase 1 Due Diligence Assessment, 1 Sirius Road, Lane Cove West, NSW', 18 October 2018, Senversa Pty Ltd (Senvessa)
 - 'Sampling and Analytical Quality Plan, 1 Sirius Road, Lane Cove West, NSW', 25 October 2018, Senversa
 - 'Phase 2 Acquisition Environmental Due Diligence Assessment, 1 Sirius Road, Lane Cove West, NSW', 13 December 2018, Senversa
 - 'Landfill Gas Monitoring Report, 1 Sirius Road, Lane Cove West, NSW', 17 July 2019, Senversa
 - 'Groundwater Monitoring Report, 1 Sirius Road, Lane Cove West, NSW', 17 July 2019, Senversa
 - 'Remedial Action Plan, 1 Sirius Road, Lane Cove West, NSW', 14 August 2019, Senversa (**the approved RAP**)

- Reference to and reliance on the TO-060A-1 Audit and reference to the reports on which it was based:
 - 'Sampling and Analytical Quality Plan – Site Validation Works, 1 Sirius Road, Lane Cove West, NSW', 31 October 2019, Senversa
 - 'Site Redevelopment, 1 Sirius Road, Lane Cove West NSW, Imported Material Data', 24 December 2019, Senversa
 - 'Asbestos Management Plan, 1 Sirius Road, Lane Cove West NSW', 13 February 2020, Senversa
 - 'Remediation and Validation Report, 1 Sirius Road, Lane Cove West NSW', 25 May 2021, Senversa (**the Remediation and Validation Report**)
- Reference to IAA #1 and the reports on which it was based:
 - 'Environmental Management Plan, 1 Sirius Road, Lane Cove West, NSW', 3 March 2022 (Revision 3), Senversa (**the Interim EMP**)
- Review of the following documents:
 - 'SYD2 DATA CENTRE – 2 Apollo Pl, Lane Cove West, Construction Environmental Management Plan', 13 September 2024, AW Edwards (**the CEMP**)
 - 'Re: Response to Auditor Comments – Asbestos Management Plan, 1 Sirius Road, Lane Cove West, NSW', 1 October 2025, Senversa
 - 'Asbestos Management Plan, 1 Sirius Road, Lane Cove West, NSW', 24 October 2025 (and previous version 6 December 2022), Senversa (**the AMP**)
- Discussions with AW Edwards and Senversa.

I have reviewed the key documents against the requirements of guidelines made or approved under Section 105 of the CLM Act, including the following:

- National Environment Protection Council (NEPC) '*National Environment Protection (Assessment of Site Contamination) Measure 1999*', as Amended 2013
- NSW EPA (2015) '*Guidelines on the Duty to Report Contamination under the Contaminated Land Management Act 1997*'
- NSW EPA (2017) '*Guidelines for the NSW Site Auditor Scheme (3rd Edition)*'
- Australian and New Zealand Guidelines (ANZG) (2018) '*Guidelines for Fresh and Marine Water Quality*'
- Australia and New Zealand Heads of EPAs (HEPA 2020) '*PFAS National Environmental Management Plan, Version 2.0*'
- NSW EPA (2020) '*Contaminated Land Guidelines, Consultants Reporting on Contaminated Land*'
- Chapter 4 Remediation of Land in the Resilience and Hazards State Environment Planning Policy (SEPP) (2021) (SEPP R&H, formerly known as SEPP 55) and NSW Department of Urban Affairs and Planning and NSW EPA (1998) '*Managing Land Contamination, Planning Guidelines SEPP 55 – Remediation of Land*'
- Western Australia Department of Health (2021) '*Guidelines for the assessment, remediation and management of asbestos contaminated sites*'
- NSW EPA (2022a) '*Contaminated Land Guidelines, Sampling design part 1 – application*' and '*Contaminated Land Guidelines, Sampling design part 2 – interpretation*'
- NSW EPA (2022b) '*Contaminated Land Consultant Certification Policy*'.

2. SITE DETAILS

The details of the larger data centre development site are as follows (**Attachment 1**):

Street address:	1 Sirius Road, Lane Cove West, NSW 2066
Identifier:	Lot 1 DP1271404
Local Government:	Lane Cove Council (Council)
Owner:	AirTrunk Lane Cove Pty Ltd (AirTrunk)
Site Area:	Approximately 4 ha

This stage of the Audit relates to Stage 2 (**Attachment 2**).

The capped landfill comprises approximately 12,000 m³ of contaminated fill material within an area covering 6,509 m². Historical remediation involved containing the fill by construction of a clay cap (the 'historical clay cap'). The capping layer comprised low permeability clay and rock/gravel compacted in 0.15 m thick layers to an overall reported thickness of up to 1.0 m.

During works relating to Stage 1, approximately 6,500 m³ of site-won soil impacted with metals and asbestos was excavated from the Stage 1 area and added to the landfill area and covered with a white geofabric marker layer and a 'new capping layer' of clean excavated site-won clay to final design levels in preparation for Stage 2 construction. The extent of this area within the historical capped area is shown on **Attachment 4**. The thickness of the 'new capping layer' to the marker layer over the top of the site-won asbestos impacted fill is shown as the survey points in black on **Attachment 5**. The thickness of bulk earthworks to the 'historical clay cap' of the historical landfill is shown as the survey points in purple on **Attachment 5**.

The Interim EMP addresses below-ground intrusive works that do not penetrate below the 'new capping layer' or 'historical clay cap' layers (e.g., shallow works such as landscaping or replacement of surface coverings). However, the Interim EMP does not apply to major excavations or construction activities that may penetrate the capping layers. The Interim EMP requires preparation of an activity specific CEMP addressing the disturbance to the clay cap and underlying contaminated material and an AMP and/or Asbestos Removal Control Plan (ARCP).

The CEMP and AMP are reviewed in **Section 3** with respect to the proposed Shell C and eastern gantry construction (Phase 4).

3. CONSTRUCTION ENVIRONMENTAL AND ASBESTOS MANAGEMENT PLANS

Disturbance of the fill material below the capping layer has the potential to release asbestos fibres.

The CEMP has been prepared to provide a framework for managing potential adverse environmental impacts during construction. The CEMP provides a framework for:

- Construction and demolition waste management
- Waste soil management and disposal
- Unexpected finds protocol
- Imported fill protocol
- Noise and vibration
- Dust and air management

- Traffic management
- Erosion and sediment control plan
- Community consultation and complaints
- Safety and environmental monitoring
- Contingency plans

Additionally, the AMP has been prepared to manage Stage 2 work that may disturb asbestos. Specific works covered by the AMP include:

- Installation of piles across north and eastern areas of Stage 2

Piling installation works were completed during Phases 1 to 3 and it is understood that an AMP and CEMP were implemented during these works. However, these were not provided for Auditor review at the time of those works.

Construction of Shell C and the eastern gantry (Phase 4) are anticipated to disturb the historic landfill at one or more piling locations in the northwest of the eastern gantry. The asbestos impacted material placed during development of Stage 1 may also be disturbed as part of the proposed works.

The AMP requires management and mitigation measures which are summarised in **Table 3.1** extracted from the AMP.

Table 3.1: AMP Management and Mitigation Measures

Activity	Management and Mitigation Measures
General	Minimise disturbance and exposure of asbestos impacted material. Where excavation is unavoidable, the controls listed herein and within the ARCP should be adhered to at all times. The Class A licensed asbestos assessor is to be in control of the designated asbestos areas at all times.
Excavation and Stockpiling of Soils	Inspection of excavations and excavated materials to identify suspected asbestos shall be conducted in accordance with monitoring requirements and indicators detailed in Section 3.0 . Stockpiles of excavated materials shall be surrounded by sediment controls to prevent sediment egress from site, and shall be covered with plastic sheeting once the stockpile is fully formed.
Onsite reuse of excavated materials	Reuse of material confirmed to contain asbestos is not permitted due to the inherent risk of fibre release. Material may be disposed of off-site to a licensed landfill following appropriate waste classification by the EC.
Waste Management	All waste excavated materials must be classified in accordance with the NSW EPA <i>Waste Classification Guidelines</i> if disposed of off-site. All waste materials must be transported and disposed lawfully to an appropriately licensed facility – noting that not all landfills may be licensed to dispose of Special waste – asbestos waste.
Unexpected Finds	The site conditions are well documented and understood (refer to the EMP), locations for piling are presented in Appendix A, as such no unexpected finds protocol is included.
Reporting	Records of inspections, sampling, waste classification, waste disposal documentation, field screening and laboratory analyses should be kept. Appropriate notification to SafeWork should be made for any removal work, the licensed asbestos removalist is responsible for notifying SafeWork of the planned work.

The AMP also requires and provides controls for:

- Any work involving the asbestos-impacted material should be undertaken in accordance with the relevant WHS regulations including personal protective equipment (PPE).
- Pile spoil management
- Stockpile footprints and pile locations (validation of stockpile footprints as well as validation of the ground immediately surrounding the pile locations where the arisings fall is required)
- Offsite disposal of asbestos impacted soil.

3.1. Auditor's Opinion

The CEMP and AMP provide an adequate framework for the management of contaminated soil during construction of Shell C and the eastern gantry (Phase 4) under the SSD.

4. SSD CONDITIONS B1 TO B3

My comments and opinions in relation to the status of Conditions B1 to B3 of the SSD are summarised in **Table 4.1**.

Table 4.1: Auditor Comment on the Status of Conditions B1 to B3

Condition	Auditor Comment
B1. Prior to the commencement of any earthworks or remediation works on site, the Applicant must engage a Site Auditor accredited under the Contaminated Land Management Act 1997 NSW Site Auditor Scheme.	<p>I was previously engaged as Site Auditor on 20 February 2019 during which time I endorsed the approve RAP (the TO-060 Audit) for the site; the Interim EMP for Stage 2 (IAA #1) and confirmed the suitability of Stage 1 for the proposed use (TO-060A-1).</p> <p>I have been re-engaged as Site Auditor in relation to Stage 2 since 19 September 2025</p>
B2. Prior to the commencement of any earthworks or remediation on site, the 'Remedial Action Plan, 1 Sirius Road, Lane Cove West, NSW' prepared by Senversa, dated 14 August 2019 (Revision 5) [the approved RAP] must be reviewed and, where required, amended to address any requirements of the Site Auditor.	<p>The approved RAP remains relevant to the site and was endorsed by me in the TO-060 Audit.</p> <p>The approved RAP has been implemented and works reported in 'Remediation and Validation Report, 1 Sirius Road, Lane Cove West NSW', 25 May 2021, Senversa which was reviewed by me for the TO-060A-1 Audit for Stage 1. Aspects relevant to Stage 2 will be documented in the anticipated Remediation and Validation Report and Section A2 Site Audit for Stage 2.</p> <p>The Interim EMP was prepared to manage the capped historical landfill and site-won contaminated material in the period before Phase 4 construction is completed. The Interim EMP required the AMP and CEMP to be prepared and implemented during construction. These have been prepared and are reviewed herein and found to be adequate for Phase 4.</p> <p>Therefore, I am of the opinion the approved RAP and the TO-060 Audit along with the AMP and CEMP are adequate to address Condition B2 for Phase 4.</p>
B3. Prior to the commencement of any earthworks or remediation on site, the Site Auditor must provide written advice to the Planning Secretary confirming the site is capable of being made suitable for the proposed development with the implementation of the final remediation approach.	<p>This IAA #2 has been prepared to address this condition, and my recommendations and conclusions are summarised in Section 5. Also, the approved RAP remains relevant and was endorsed for the TO-060 Audit which was completed prior to approval of the SSD.</p>

5. CONCLUSIONS AND RECOMMENDATIONS

Based on the outcomes of the TO-060 Audit, TO-060A-1 Audit, IAA #1 and the information reviewed herein, I am of the opinion the site is capable of being made suitable for the proposed development by implementation of the approved RAP, Interim EMP, AMP, and CEMP.

At completion, a validation report should be prepared in relation to Stage 2 works documenting:

- Implementation of the approved RAP
- Implementation of an appropriate AMP and CEMP during Phase 3
- Implementation of the AMP and CEMP during Phase 4
- Validation of stockpile footprints and the ground immediately surrounding the pile locations (as required by the AMP)
- Management of any unexpected finds
- Validation of imported materials
- Waste management and disposal
- Evidence of compliance with Ongoing Maintenance Order no. 20212810
- Correspondence with the NSW EPA regarding any disturbances of the cap during Stage 2.

The Interim EMP should be updated to a long-term EMP following development of Stage 2 (as required by Conditions B6 and B7 of the SSD).

It is anticipated the validation report and long-term EMP will be assessed in a Section A2 SAS and SAR as required by Condition B5 of the SSD.

Unexpected finds or disturbances of the clay cap should be notified to the Auditor as soon as practicable (and the NSW EPA where appropriate).

6. LIMITATIONS

This interim audit advice was conducted on behalf of AW Edwards for the purpose of assessing an AMP and CEMP. This summary report may not be suitable for other uses.

The Auditor has relied on the documents referenced in **Section 1.2** in preparing the Auditor's opinion. The consultants included limitations in their reports. This interim audit advice must also be subject to those limitations. The Auditor has prepared this document in good faith but is unable to provide certification outside of areas over which the Auditor had some control or is reasonably able to check. If the Auditor is unable to rely on any of those documents, the conclusions of this interim audit advice could change.

It is not possible to present all data which could be of interest to all readers of this interim audit advice. Readers are referred to the referenced reports for further data. Users of this document should satisfy themselves concerning its application to, and where necessary seek expert advice in respect to, their situation.

* * *

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



Tom Onus
EPA Accredited Site Auditor 1505

D 02 9954 8133

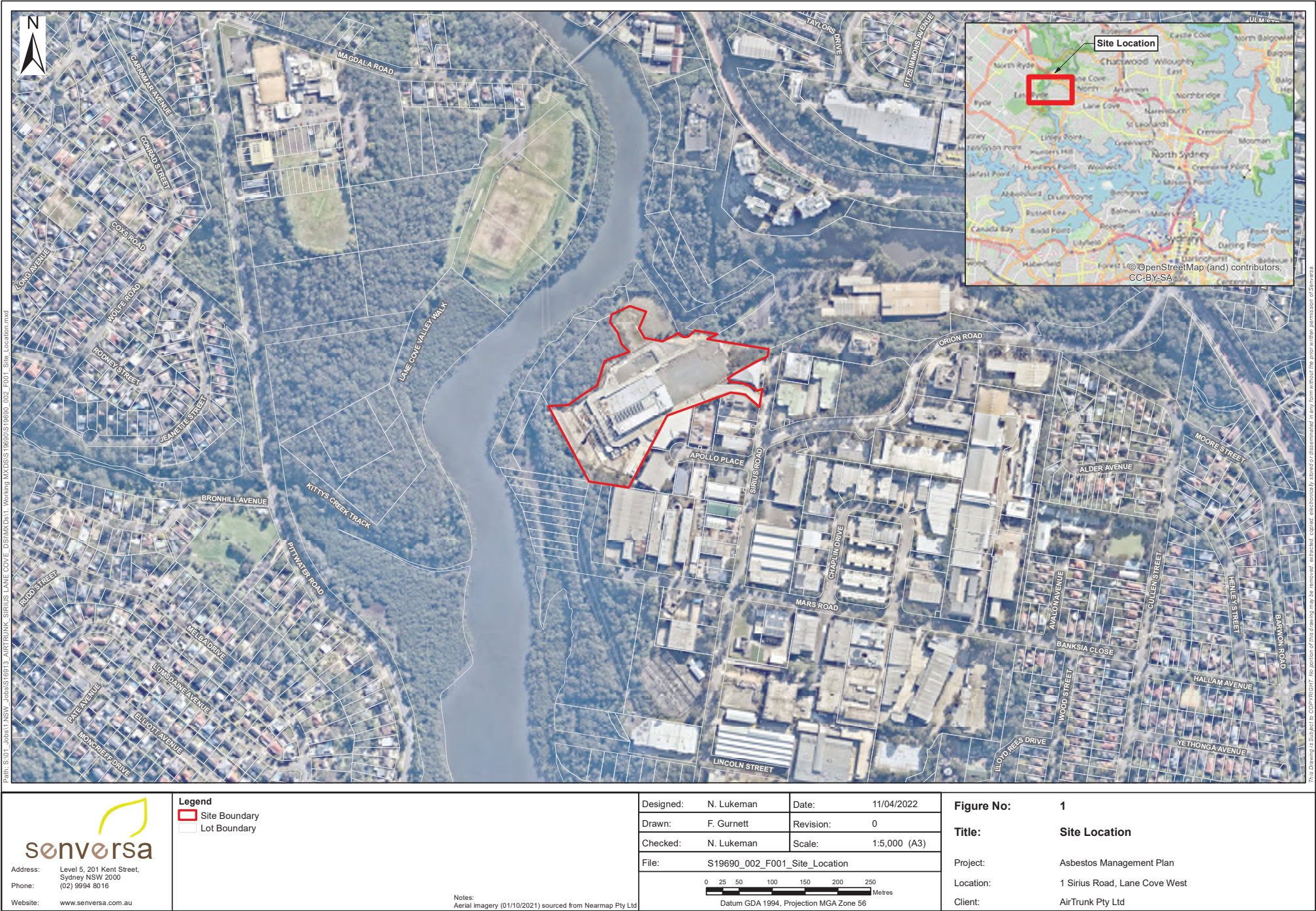
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tonus@ramboll.com

Attachments:

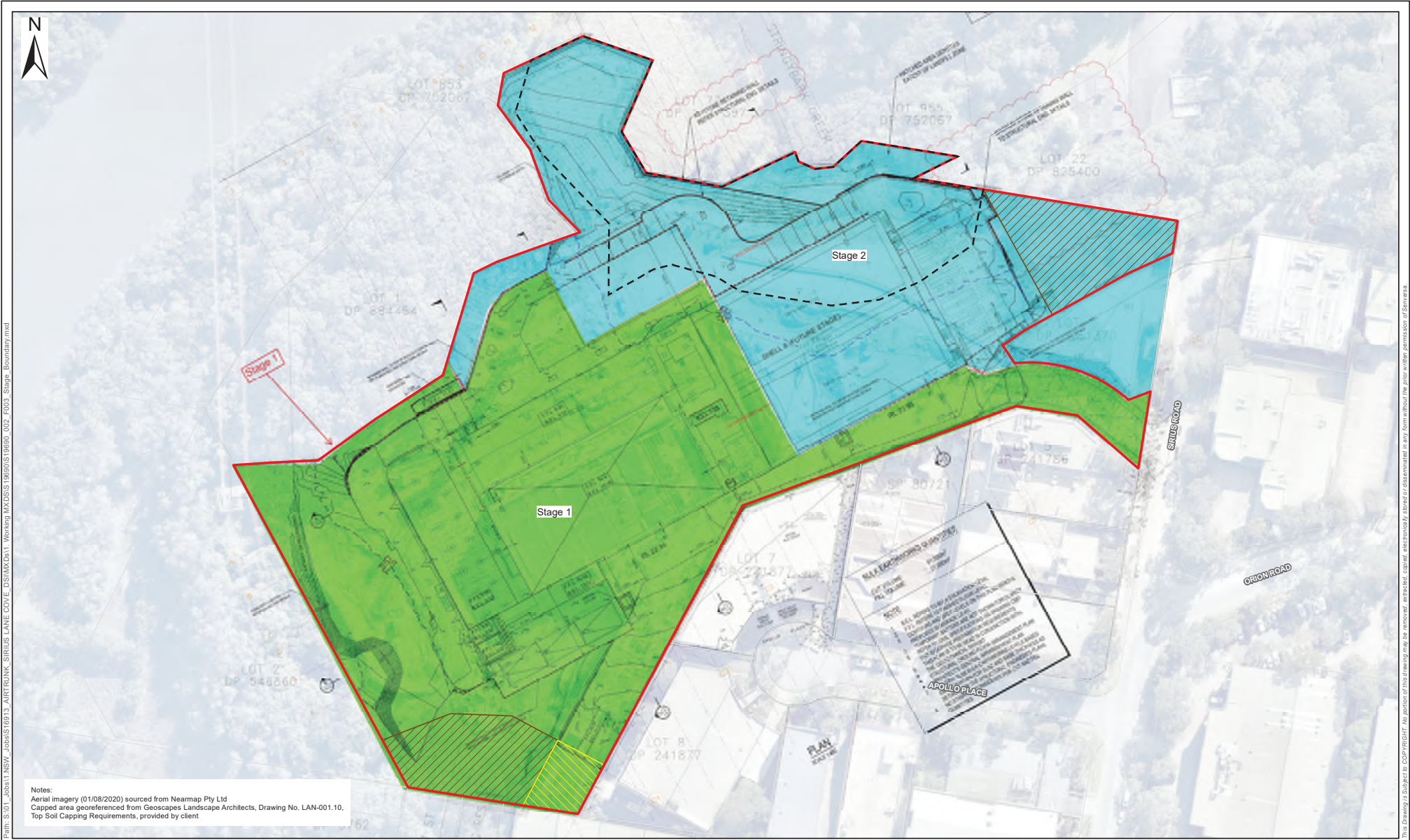
- 1 Site Locality
- 2 Stage 1 and Stage 2
- 3 Boundary of Capped Material
- 4 Extent of Site-Won Contaminated Materials and Historical Capped Area
- 5 Survey Plan of Capped Materials
- 6 Site Plan showing Shell C and Eastern Gantry (in blue and green)

Attachment 1: Site Locality



Address: Level 5, 201 Kent Street,
Sydney NSW 2000
Phone: (02) 9994 8016

Website: www.senversa.com.au



senversa

Address: Level 5, 201 Kent Street,
Sydney NSW 2000
Phone: (02) 9994 8016
Website: www.senversa.com.au

Legend

- Capped Area
- Bush Regeneration Area
- Upper Escarpment Area
- LTEMP Staging Mark-up Delineation**
- Stage 1 (24,146 m²)
- Stage 2 (17,058 m²)
- Site Boundary
- Lot Boundary

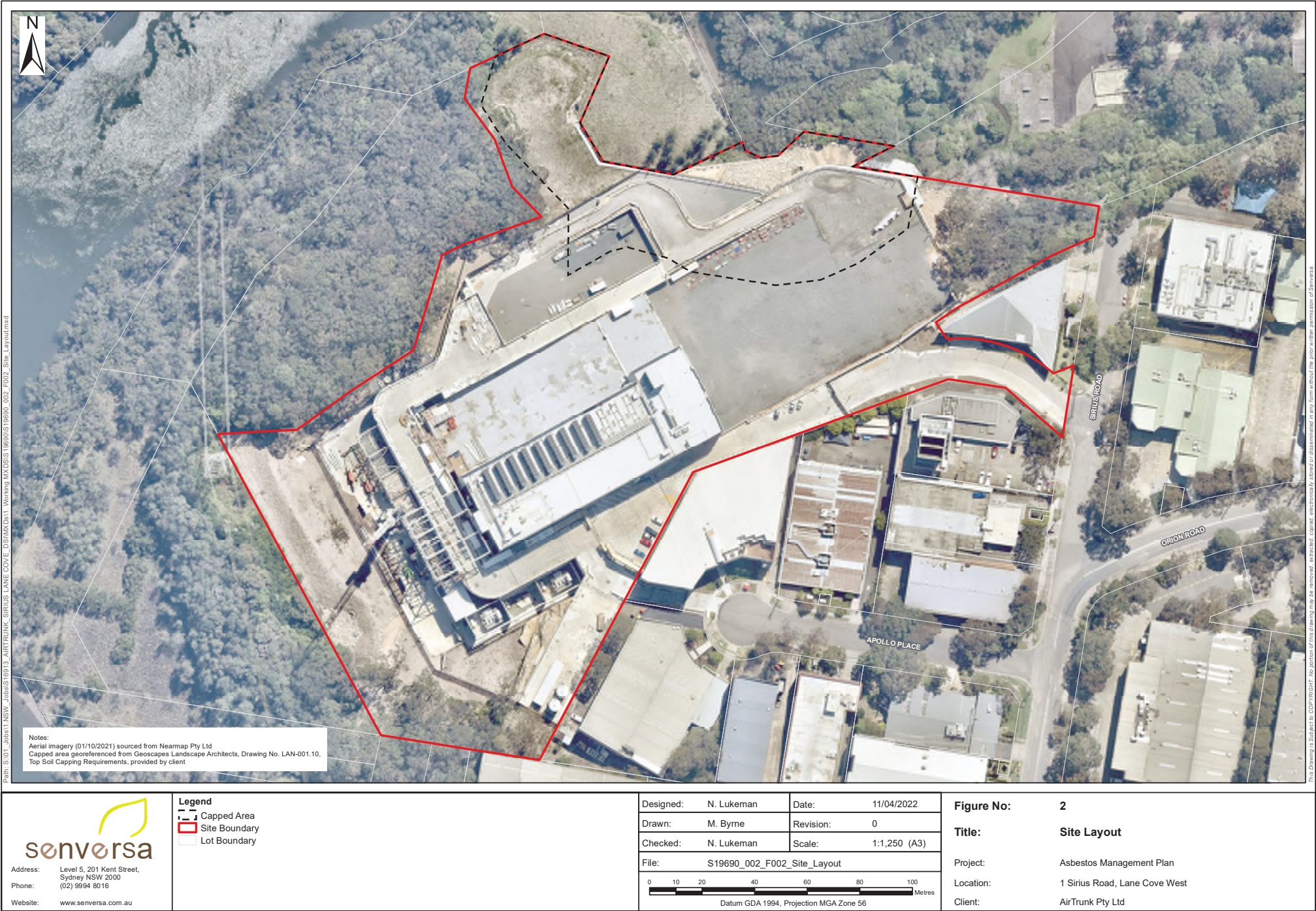
Designed: N. Lukeman
Date: 11/04/2022
Drawn: F. Gurnett
Revision: 0
Checked: N. Lukeman
Scale: 1:1,250 (A3)
File: S19690_002_F003_Stage_Boundary

0 10 20 40 60 80 100 Metres

Datum GDA 1994, Projection MGA Zone 56

Figure No: 3
Title: Stage Boundary

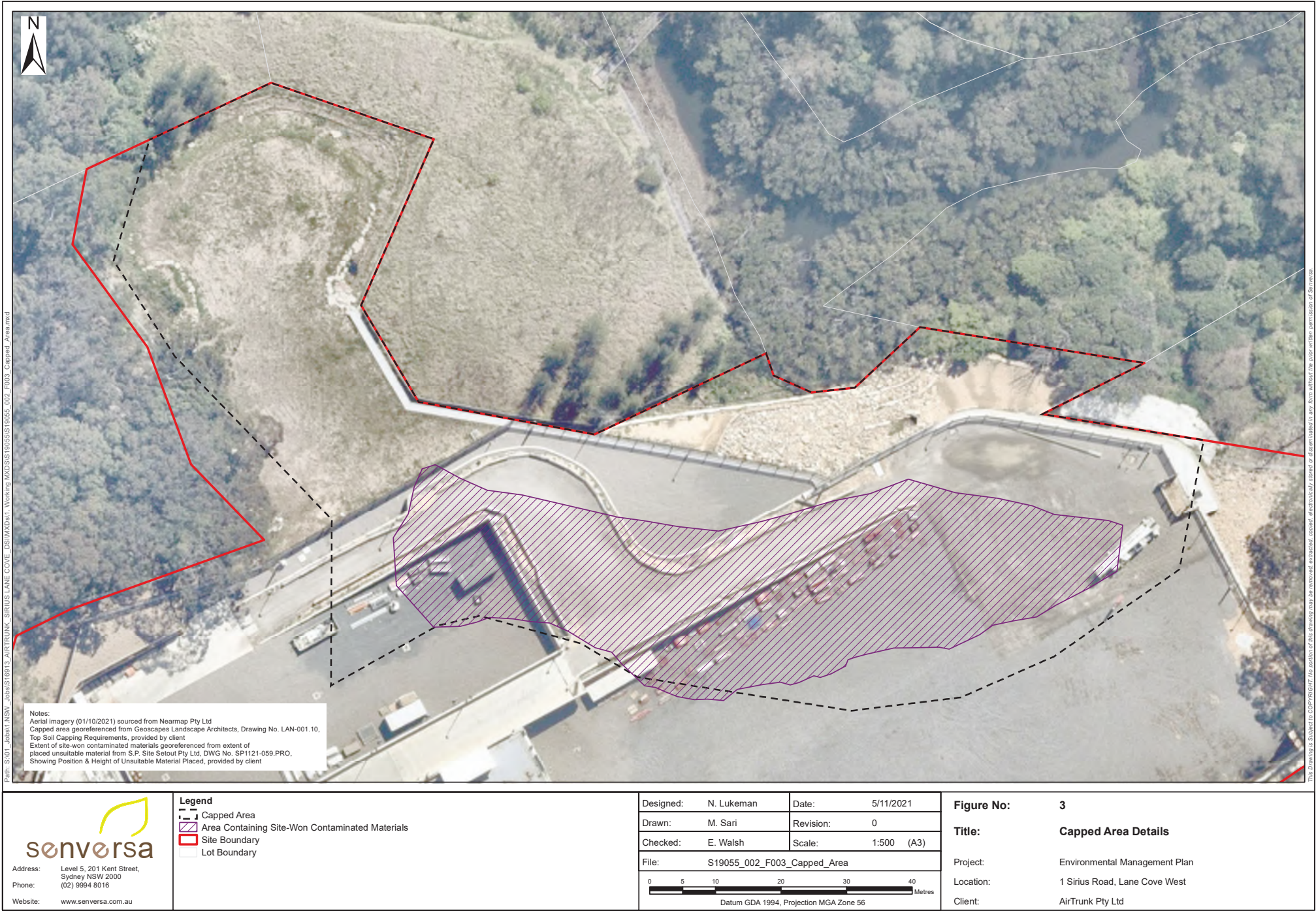
Project: Asbestos Management Plan
Location: 1 Sirius Road, Lane Cove West
Client: AW Edwards on behalf of Airtrunk

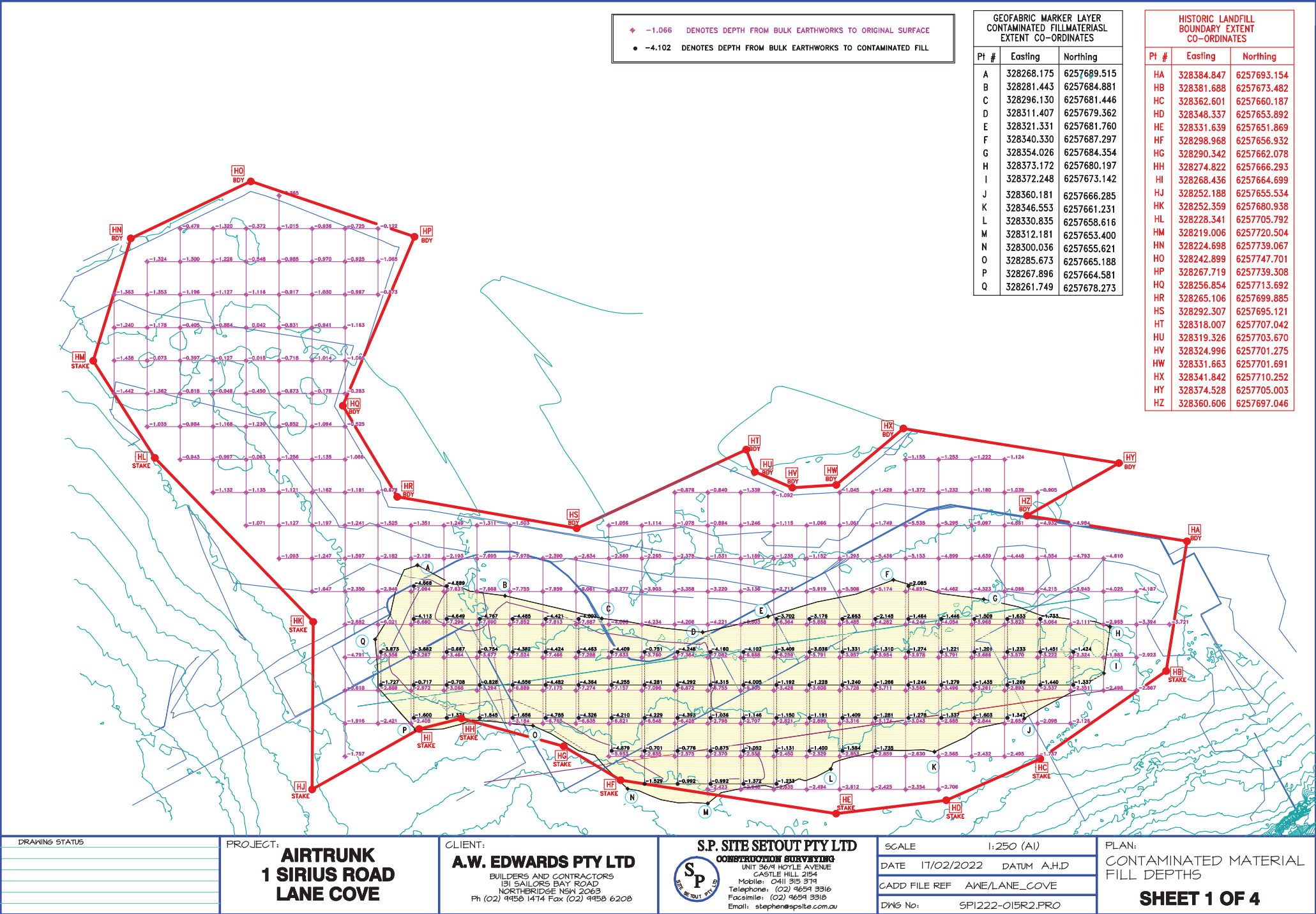


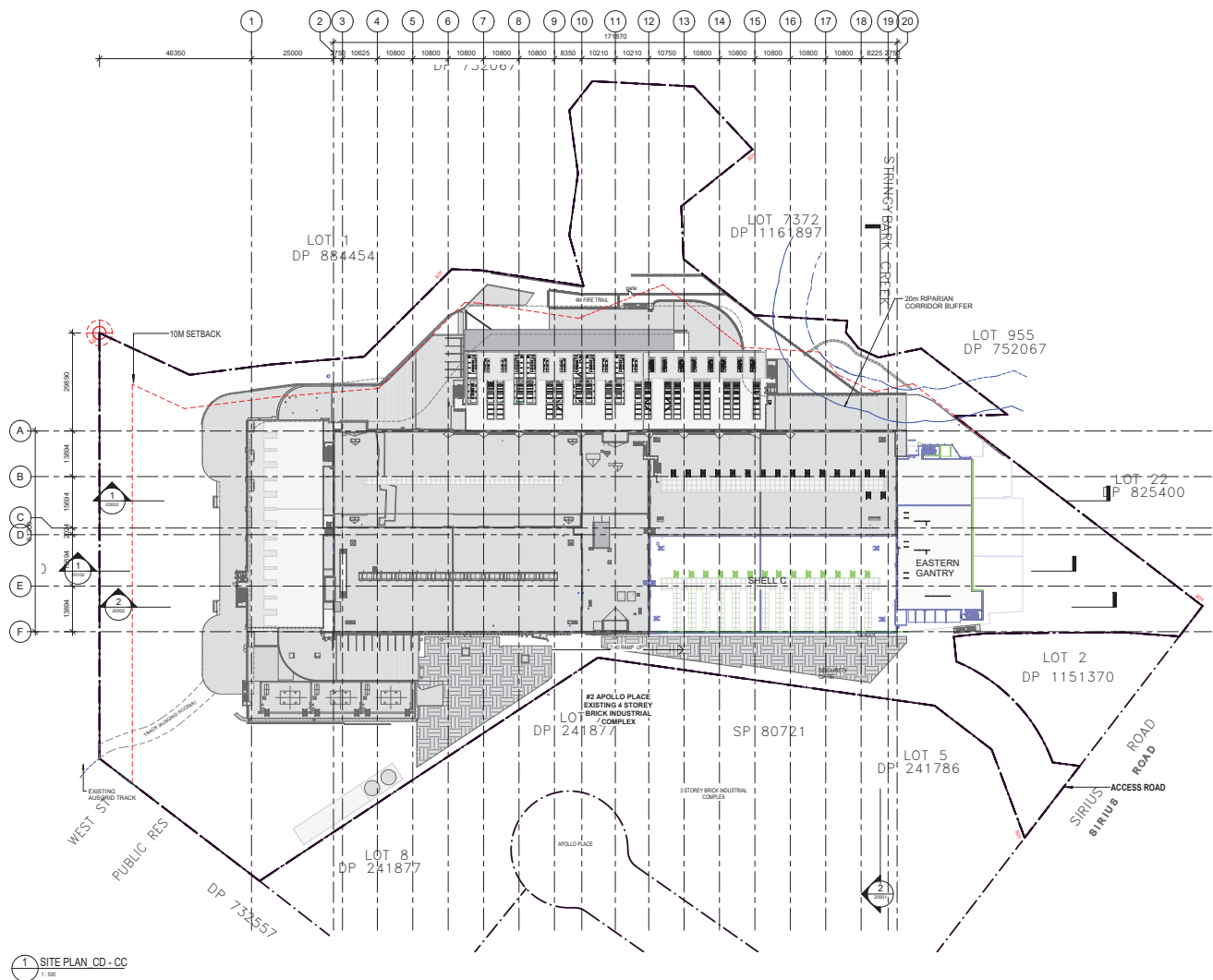
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This Drawing is Subject to COPYRIGHT. No portion of this drawing may be removed, extracted, copied, electronically stored or disseminated in any form without the prior written permission of Senversa.

Attachment 4: Extent of Site-Won Contaminated Materials and Historical Capped Area





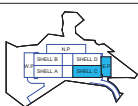




Date	Description
15.10.2020	DESIGN CD - CONSTRUCTION
15.10.2020	DESIGN CD - CONSTRUCTION
15.10.2020	DESIGN CD - CONSTRUCTION

LEGEND:

- EXISTING ELEMENTS
- EXTENT OF FITOUT
- PROPOSED WORK
- PROPOSED FUTURE WORK
- PREVIOUS WORKS TO BE DEMOLISHED



KEYPLAN

DRAWING IS COLOUR CODED. PRINT ALL COPIES IN COLOUR

AW EDWARDS

AIRTRUNK

Greenbox
A WOODFORD COMPANY

Use written dimensions only.
Do not scale from drawing.
Control of existing services, dimensions and site prior to commencing any work.
All work to be done in accordance with the manufacturer's specifications and instructions and shall comply with the relevant Australian Standards.

Drawn by: AIRTRUNK SYD
1 Sirius Rd
Lane Cove West NSW 2086

Checked by: AIRTRUNK SYD
1 Sirius Rd
Lane Cove West NSW 2086

Scale: 1:100
Date: 15.10.2020
Project: 100m SETBACK

Issued for: CONSTRUCTION CERTIFICATE STAGE 2

Drawn by: AIRTRUNK SYD
1 Sirius Rd
Lane Cove West NSW 2086

Checked by: AIRTRUNK SYD
1 Sirius Rd
Lane Cove West NSW 2086

Scale: 1:100
Date: 15.10.2020
Project: 100m SETBACK

Issued for: CONSTRUCTION CERTIFICATE STAGE 2

ISSUED FOR CONSTRUCTION CERTIFICATE STAGE 2