



Cobbitty Consulting
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Sydney Desalination Plant

Follow-up Licence Plan Audit

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Independent Pricing and Regulatory Tribunal

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1. Executive Summary

1.1 Auditor Declaration

This report presents the findings of a Follow-up Licence Plan Audit of Sydney Desalination Plant Pty Ltd's compliance with the requirements of the relevant provisions of the *Water Industry Competition (General) Regulation 2008* as they relate to the Sydney Desalination Plant.

The auditors confirm that:

- the auditors were provided with sufficient evidence, as described in the IPART, *Audit Guideline for Brownfield Schemes; Water Industry Competition Act 2006 (NSW)*, July 2013 (WIC Act Audit Guidelines), on which to base the conclusions reached during the audit;
- the audit findings accurately reflect the professional opinion of the auditors;
- the auditors have conducted the audit, determined the audit findings and prepared this report in accordance with the requirements of the WIC Act Audit Guidelines¹ and the provisions of the Audit Deed; and
- the audit findings have not been unduly influenced by the Licensee and/or any of its associates and express the auditor's opinion as to whether the Licensee has met the Licence conditions and regulatory requirements as specified in the scope.

1.2 Major Findings

The Licensee, Sydney Desalination Plant Pty Ltd, was found to be constructing, repairing, operating and maintaining the Sydney Desalination Plant in full compliance with the assessed audit criteria. No non-compliances were identified. The audited infrastructure complied with the audited requirements of the Regulation and Licence conditions and was found to be operating safely.

Three recommendations from previous audits remain outstanding but are not due for completion under December 2018. Sufficient progress has been made that they are on track to be fully addressed by the agreed target date of December 2018. If not addressed by December 2018, as agreed, the relevant audit criteria will become non-compliant.

1.3 Recommendations

No recommendations have been made as a result of this audit.

¹ IPART, *Audit Guideline for Brownfield Schemes; Water Industry Competition Act 2006 (NSW)*, July 2013.

2. Introduction

2.1 Objectives

This report presents the findings of a Follow-up Licence Plan Audit undertaken for the Independent Pricing and Regulatory Tribunal (IPART) under the provisions of the *Water Industry Competition Act 2006*.

The objective of the audit was to assess compliance of the Licensee, Sydney Desalination Plant Pty Ltd (SDP), in meeting the requirements of the relevant legislation (the *Water Industry Competition Act 2006* and *Water Industry Competition (General) Regulation 2008*) and its Network Operator's Licence (Licence No: 10_010) for the Sydney Desalination Plant.

2.2 Licensee's Infrastructure, Systems and Procedures

The infrastructure, systems and procedures subject to audit are those related to the Sydney Desalination Plant (refer: <http://www.sydneydesal.com.au/>). The Sydney Desalination Plant treats seawater using reverse osmosis and disinfection processes to a quality suitable for drinking water.

Sydney Desalination Plant Pty Ltd (ACN 125 935 177) is the Licensee, holding Network Operator's Licence No: 10_010. As Licensee, SDP is responsible for the ongoing operation and maintenance of the treatment facility in accordance with its Licence Plans including:

- Water Quality Plan – Sydney Desalination Plant, *Water Quality Plan*, Version 4, July 2018 (WQP (dw)); and
- Infrastructure Operating Plan – Sydney Desalination Plant, *Infrastructure Operating Plan* (Revision 3), July 2018.

2.3 Audit Method

2.3.1 Audit Scope

The audit comprised a Follow-up Licence Plan Audit conducted pursuant to the *WIC Act Audit Guidelines*.² The nominated scope addresses selected requirements of:

- the *Water Industry Competition (General) Regulation 2008*; and
- Network Operator's Licence No: 10_010.

The report presents a follow-up audit of the WQP (dw) based on the previous Licence Plan Audit dated to 2015³, as requested by IPART⁴.

² IPART, *Audit Guideline for Brownfield Schemes; Water Industry Competition Act 2006 (NSW)*, July 2013.

³ Risk Edge, *Water Industry Competition Act 2006 (NSW) Licence No. 10_010 Operational Licence Audit for Sydney Desalination Plant Pty Ltd*, Final Report, 7 July 2015.

⁴ IPART, *Operational audit and follow up licence plans audit*; letter from IPART to SDP, reference D18/12337, dated 25 May 2018.

2.3.2 Audit Standard

The audit has been undertaken in accordance with the principles/guidance presented in:

- ISO 19011:2011 *Guidelines for auditing management systems*; and
- IPART, *Audit Guideline for Brownfield Schemes; Water Industry Competition Act 2006 (NSW)*, July 2013 (WIC Act Audit Guidelines).

2.3.3 Audit Steps

The audit has been undertaken generally in accordance with the procedure outlined in the *WIC Act Audit Guidelines*.

Following approval of an *Audit Proposal* by IPART, an *Audit Agenda* and *Information Request* were sent to both the Licensee and IPART one week prior to the audit fieldwork being undertaken. Audit fieldwork comprising a desktop audit of relevant documentation/records and a site inspection of the infrastructure was undertaken on 31 July 2018. The auditor requested some items of additional information and/or clarification following the audit fieldwork; this information was provided to the auditor in the period between completing the fieldwork and issuing the audit report.

A draft audit report was prepared and submitted to the Licensee for review, before being finalised and issued to both the Licensee and IPART.

The audit process involved seeking objective evidence that the Licensee had complied with the obligations identified for audit by IPART. Evidence was obtained through interview, review of relevant documentation and records, and site inspection.

2.3.4 Audit Team

The audit of the *Water Quality Plan* was conducted by Dan Deere with quality assurance review being conducted by Jim Sly. Both auditors hold relevant Lead Auditor accreditation on IPART's Technical Services and Water Licensing Panel.

SDP was represented by Philip Narezzi and Matt Blaikie, together with Alban Delpey, Phil Birkby, Tony Arneil, Joseph Camenzuli and Violetta Wypych of Veolia Water Australia Pty Ltd (Veolia), an "Authorised person" under the Licence.⁵

IPART representatives Jessica Hanna and Gudny Palsdottir attended as observers during the audit fieldwork.

2.3.5 Audit Grades

Audit grades have been awarded in accordance with guidance presented in the *WIC Act Audit Guidelines*. The compliance grades applicable for the purposes of this audit were as identified in **Table 2.1**.

⁵ Philip Narezzi attended for brief period only; Alban Delpey attended for the audit inception only.

Table 2.1 Audit Compliance Grades

Compliance Grade	Description
Compliant	Sufficient evidence has been provided in the audit on which to make a judgment on all requirements, and all requirements have been met.
Non-compliant Insignificant	There is a deficiency in compliance, however, it does not adversely impact on the ability of the Licensee to achieve defined objectives or assure controlled processes, products or outcomes.
Non-compliant Significant	There is a deficiency in compliance which adversely impact on the ability of the Licensee to achieve defined objectives or assure controlled processes, products or outcomes.
No Requirement	There was no requirement to comply with the Licence condition during the audit period.

2.4 Regulatory Regime

The SDP operates in accordance with the provisions of a Network Operator's Licence (Licence No: 10_010) issued under the *Water Industry Competition Act 2006* (NSW). Other relevant regulatory instruments and standards/guidelines include:

- *Water Industry Competition (General) Regulation 2008* (NSW);
- IPART, *Audit Guideline for Brownfield Schemes; Water Industry Competition Act 2006* (NSW), July 2013;
- *Australian Drinking Water Guidelines 2011* (as amended from time to time under rolling revision);
- *Plumbing Code of Australia*;
- *Plumbing and Drainage Act 2011* (NSW); and
- NSW and national water industry and environmental regulations and codes of practice as applicable.

2.5 Quality Assurance Process

The quality of this audit report was assured through a professional review process. The report has been independently reviewed by a Lead Auditor who holds relevant accreditation on IPART's Technical Services and Water Licensing Panel.

2.6 Audit Findings

Audit findings are summarised in **Section 3** and presented in full detail in **Appendix A**.

3. Water Quality Plan – Drinking Water

3.1 Summary of Findings

There were no identified non-compliances in respect of the audited clauses of the *Water Industry Competition (General) Regulation 2008* related to the *Water Quality Plan (drinking water)* (WQP (dw)). Detailed assessment in respect of these clauses is presented in **Appendix A**.

Three recommendations from previous audits (identified as WICRSched1cl.7(1) R/E2-4, WICRSched1cl.7(1) R/E2-5 and WIC Reg Sched 1 cl. 7(1) R/E3-1) remain outstanding but are not due for completion under December 2018. Sufficient progress has been made that they are on track to be fully addressed by the agreed target date of December 2018. If not addressed by December 2018, as agreed, the relevant audit criteria will become non-compliant.

3.2 Review of Actions

The Licensee has not made any suggestions for corrections or clarifications following issue of the draft report and prior to the final report being issued.

3.3 Opportunities for Improvement

The following opportunity for improvement has been identified in respect of the WQP (dw) as a result of this audit:

- **OFI-SDP-WQP.01:** Prior to routine operations and the production of water for supply to Sydney Water restarting, it would be best practice to develop a clear, concise CCP summary, targeted to SDP operators. The CCP summary would set out for each of the CCPs (and possibly some other major process control points), the nature of the critical limits, operational monitoring of those limits and the corrections and corrective actions required if those limits are exceeded. That information is largely captured in the broad body SDP and VWA documentation provided during the audit, but not in a concise operator-friendly format. Prior to starting routine operations it would be useful to summarise that concisely to help ensure no confusion arises.

Appendix A Detailed Audit Findings – Water Quality Plan (drinking water)

Detailed audit findings in respect of the obligations related to the WQP (dw) are presented in this Appendix.

Table A.1 WQP (dw) Audit Table – WIC Reg Sched 1 cl.7(1)(a)

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl. 7(1)(a)	Element 2. The WQP (dw) includes an assessment of the water supply system.	Compliant
Risk	Target for Full Compliance	
Failure to adequately describe the system and assess risks could lead to risks being overlooked.	Adequate system description and risk assessment.	
Evidence sighted		
<ul style="list-style-type: none"> ▪ Sydney Desalination Plant, <i>Water Quality Plan, Version 4</i>, July 2018. ▪ Sydney Desalination Plant, <i>Appendix 3 of the Water Quality Plan: SDP Generalised Flow Diagram</i>, appended to the Sydney Desalination Plant, <i>Water Quality Plan, Version 4</i>, dated July 2018. ▪ VWA, <i>CRA-KDP-13-650 Water Quality Risk Register</i>, referenced in <i>Appendix 1 of the Water Quality Plan: Summary of Compliance with Australian Drinking Water Guidelines</i> and appended to the Sydney Desalination Plant, <i>Water Quality Plan, Version 4</i>, dated July 2018. ▪ Sydney Water, <i>KnowRisk Catchment to Customer Drinking Water Quality Risk Assessment, Kurnell Supplement</i>, 24 November 2017. ▪ Interviews with Matt Blaikie, Phil Birkby, Tony Arneil, Joseph Camenzuli and Violetta Wypych. ▪ Site inspection of the Sydney Desalination Plan on 31 July 2018. 		
Summary of reasons for grade		
<p>SDP demonstrated that the WQP (dw), in conjunction other referenced documentation, includes an assessment of the drinking water supply system. The system arrangement is clearly documented and a risk assessment has been undertaken by an appropriately experienced team in accordance with the guidance presented in the Australian Drinking Water Guidelines (ADWG) 'Framework'. The items identified as being non-compliant and requiring follow-up during the previous audit were audited and found to have been subject to amendment, update and completion since that audit. Accordingly, SDP was assessed as having now demonstrated full compliance with this obligation.</p>		
Discussion and notes		
<p>Follow-up items identified for audit by IPART⁶ were checked as part of the WQP (dw) licence plan follow up audit addressing the feedback from the previous audit:⁷</p> <p><i>“System Understanding and Flow Diagram: The ADWG Framework Element 2 requires that a system assessment is undertaken (including development of a conceptual flow diagram) and used as the basis of the risk assessment. This approach is also supported by VWA's own documentation. While some conceptual diagrams have been produced and while more complex flow diagrams are available, they currently do not meet the intent of the Framework. Nor have the diagrams been signed off as 'groundtruthed' (or verified).</i></p> <p><i>Catchment to tap risk approach: The ADWG Framework Element 2 requires that a risk assessment is undertaken from catchment to tap. While SDP has been involved in a catchment to tap risk review with SWC, a similar</i></p>		

⁶ IPART, *Operational audit and follow up licence plans audit*; letter from IPART to SDP, reference D18/12337, dated 25 May 2018.

⁷ Risk Edge, *Water Industry Competition Act 2006 (NSW) Licence No. 10_010 Operational Licence Audit for Sydney Desalination Plant Pty Ltd; Final Report*, 7 July 2015.

approach has not yet been undertaken for the SDP assets (although there is some system component detail in the CCP Register).

Risk Assessment: By not developing and referring to a contextualised system description for the risk assessment (previous point), it is possible that some hazardous events and risks could be missed. It is not that the auditors think that controls are not in place, but that the auditors are not yet satisfied that all risks have been appropriately identified and addressed.”

Since the previous audit, SDP has prepared a comprehensive process flow diagram⁸ that meets the intent of the ADWG Framework. It is noted that the ADWG is not explicit in relation to precisely how much depth and detail should be included in such a flow diagram, hence reference to ‘the intent’ of the ADWG framework. The flow diagram is sufficient to convey the process steps and inform a risk assessment as part of Element 2 of the ADWG Framework, and in that respect it is considered sufficient.

Since the previous audit, drinking water quality risks related to the Sydney Desalination Plant have been wholly and comprehensively updated as the Kurnell Supplement as part of the Sydney Water ‘KnowRisk’ ‘Catchment to Customer’ drinking water quality risk assessment. The Sydney Water risk assessment has been updated within the 2017-18 period and has considered both established and emerging issues⁹. That Sydney Water work aligns to the ADWG Framework, involves inputs from SDP staff, and is subject to IPART audit under the public utility licencing arrangements.

In addition to taking part in the Sydney Water assessments, SDP and VWA have their own risk registers relating to the Sydney Desalination Plant for a range of risks including drinking water quality that have been updated since the previous audit. VWA has a site-specific risk assessment¹⁰ for the Sydney Desalination Plant, pump station and pipeline, which is reviewed annually, which was last updated 13th September 2017. The VWA file includes a copy of the process flow diagram and the Sydney Water ‘Catchment to Customer’ risk assessment embedded within the same file along with clear instructions for completing the risk assessment, a record of who was present, and set of assessed risks and their controls based on needing to comply with explicit water quality product specifications. Therefore, the drinking water quality risk assessments in place for the SDP meet the intent of the ADWG Framework.

Given the accuracy, currency and quality of the process flow diagram and risk assessment evidence presented, and that has been developed and updated since the previous audit, SDP was assessed as having now demonstrated full compliance with this obligation, closing out these follow-up requirements.

Recommendations

There are no recommendations in respect of this obligation.

Opportunities for improvement

No opportunities for improvement are identified in respect of these obligations.

⁸ Sydney Desalination Plant, *Appendix 3 of the Water Quality Plan: SDP Generalised Flow Diagram*, dated 23 June 2016 and appended to the Sydney Desalination Plant, *Water Quality Plan, Version 4*, dated July 2018.

⁹ Sydney Water, *KnowRisk Catchment to Customer Drinking Water Quality Risk Assessment, Kurnell Supplement*, 24 November 2017.

¹⁰ VWA, *CRA-KDP-13-650 Water Quality Risk Register*, referenced in *Appendix 1 of the Water Quality Plan: Summary of Compliance with Australian Drinking Water Guidelines* and appended to the Sydney Desalination Plant, *Water Quality Plan, Version 4*, dated July 2018.

Table A.2 WQP (dw) Audit Table – WIC Reg Sched 1 cl.7(1)(a)

Clause	Requirement	Compliance Grade
WIC Reg Sched 1 cl. 7(1)(a)	Element 3. The WQP (dw) outlines the preventive measures for drinking water quality management.	Compliant
Risk		Target for Full Compliance
Failure to adequately define preventive measures and assess residual risks could lead to risks being overlooked.		Adequate definition of preventive measures and residual risk assessment.
Evidence sighted		
<ul style="list-style-type: none"> ▪ Sydney Desalination Plant, <i>Water Quality Plan, Version 4</i>, July 2018. ▪ Interviews with Matt Blaikie, Phil Birkby, Tony Arneil, Joseph Camenzuli and Violetta Wypych. ▪ Site inspection of the Sydney Desalination Plan on 31 July 2018. ▪ Sydney Desalination Plant, <i>Appendix 2 of the Water Quality Plan: Critical Control Points Table</i>, appended to the Sydney Desalination Plant, <i>Water Quality Plan, Version 4</i>, dated July 2018. ▪ VWA, <i>CRA-KDP-13-651 Completed HACCP Analysis</i>, referenced in <i>Appendix 1 of the Water Quality Plan: Summary of Compliance with Australian Drinking Water Guidelines</i> and appended to the Sydney Desalination Plant, <i>Water Quality Plan, Version 4</i>, dated July 2018. 		
Summary of reasons for grade		
<p>SDP demonstrated that the WQP (dw), in conjunction other referenced documentation, provides details in relation to the risk management measures (controls) that it will implement in respect of drinking water quality. It has also identified the critical control points (CCPs) that will be used to monitor performance of the multiple barrier treatment process that is to be implemented to ensure that the water is compliant with the requirements of the ADWG Framework. The items identified as being non-compliant during the previous audit and requiring follow-up under this audit were assessed and found to have been subject to amendment, update and completion since that audit. Accordingly, SDP was assessed as having now demonstrated full compliance with this obligation.</p> <p>Three recommendations from previous audits (identified as WICRSched1cl.7(1) R/E2-4, WICRSched1cl.7(1) R/E2-5 and WIC Reg Sched 1 cl. 7(1) R/E3-1) remain outstanding but are not due for completion under December 2018. Sufficient progress has been made that they are on track to be fully addressed by the agreed target date of December 2018. If not addressed by December 2018, as agreed, the relevant audit criteria will become non-compliant.</p>		
Discussion and notes		
<p>Follow-up items from the previous audit for ADWG Framework Element 3 were not explicitly identified for audit by IPART¹¹ which only identified follow-up items for ADWG Framework Element 2.¹² Reading the previous audit report, it has been inferred that the non-compliance reported for ADWG Framework Element 3 related to concerns that the critical control point (CCP) information might not be valid, given that the risk assessment covered under ADWG Framework Element 2 was not compliant.</p> <p>Since the previous audit, the WQP (dw) is now assessed to be fully complaint with ADWG Framework</p>		

¹¹ IPART, *Operational audit and follow up licence plans audit*; letter from IPART to SDP, reference D18/12337, dated 25 May 2018.

¹² Risk Edge, *Water Industry Competition Act 2006 (NSW) Licence No. 10_010 Operational Licence Audit for Sydney Desalination Plant Pty Ltd; Final Report*, 7 July 2015.

Element 2, as reported in Table A.1. In addition, the CCPs for the Sydney Desalination Plant have been reviewed and updated¹³ with VWA having a site-specific HACCP register¹⁴ for the Sydney Desalination Plant which was last updated on 24th February 2017 and focuses on ensuring treated water meets the nominated contractual limits. Therefore, the CCP information in place for the SDP now meets the intent of the ADWG Framework Element 3.

Given the accuracy, currency and quality of the CCP evidence presented, that has been developed and updated since the previous audit, SDP was assessed as having now demonstrated full compliance with this obligation, closing out the follow-up requirements identified in audit scope identified for audit by IPART¹⁵.

Whilst the relevant information is present in the documentation provided by SDP and VWA, a simple, concise operator-friendly summary wasn't yet developed. An opportunity for improvement (**OFI-SDP-WPQ.01**) has been identified relating to summarising that information prior to routine supply of potable water restarting.

As part of finalising procedures and reporting around CCPs, SDP is intending to address the following previous recommendations arising from previous audits¹⁶ to be addressed prior to December 2018:

- WICRSched1cl.7(1) R/E2-4: As part of the CCP review, all limits should be interrogated to ensure that they appropriately reflect the requirements of a CCP, specifically as this relates to Framework requirements and the SDP's own definitions of a CCP e.g. operational parameters should be chosen that can be monitored frequently enough to reveal any exceptions in a timely manner.
- WICRSched1cl.7(1) R/E2-5: The responsibilities for CCP7 should be finalised and implemented as a matter of urgency.
- WIC Reg Sched 1 cl. 7(1) R/E3-1: Ensure that once the CCP review has been completed, that the revised CCPs are subjected to an external review by an approved technical specialist to test appropriateness, adequacy and validation of the critical limits chosen.

These previously recommended actions were intended to be addressed by December 2018 and, consistent with that agreement, weren't identified in the audit scope identified for audit by IPART.¹⁷ At the time of this audit (August 2018) they had not been explicitly addressed; however, it is noted that satisfactory progress has been made towards achieving the identified goals. Sufficient progress has been made that they are on track to be fully addressed by the agreed target date of December 2018. Once re-build and commissioning has been completed, it is understood that the CCPs are to be finalised, tested and implemented, as recommended. Therefore, no new non-compliances, opportunities for improvement or recommendations are made in relation to these previous recommendations since whilst it is noted that SDP has yet to fully address them, they aren't due to be addressed until December 2018. If not addressed by December 2018, as agreed, the relevant audit criteria will become non-compliant.

Recommendations

There are no recommendations in respect of this obligation.

¹³ Sydney Desalination Plant, *Water Quality Plan, Version 4*, July 2018, Appendix 2 *Summary table of SDP's Critical Control Points*.

¹⁴ VWA, *CRA-KDP-13-651 Completed HACCP Analysis*, referenced in *Appendix 1 of the Water Quality Plan: Summary of Compliance with Australian Drinking Water Guidelines* and appended to the Sydney Desalination Plant, *Water Quality Plan, Version 4*, dated July 2018.

¹⁵ IPART, *Operational audit and follow up licence plans audit*; letter from IPART to SDP, reference D18/12337, dated 25 May 2018.

¹⁶ Risk Edge, *Water Industry Competition Act 2006 (NSW) Licence No. 10_010 Operational Licence Audit for Sydney Desalination Plant Pty Ltd; Final Report*, 7 July 2015.

¹⁷ IPART, *Operational audit and follow up licence plans audit*; letter from IPART to SDP, reference D18/12337, dated 25 May 2018.

Opportunities for improvement

- **WQP-OFI1:** Prior to routine operations and the production of water for supply to Sydney Water restarting, it would be best practice to develop a clear, concise CCP summary, targeted to SDP operators. The CCP summary would set out for each of the CCPs (and possibly some other major process control points), the nature of the critical limits, operational monitoring of those limits and the corrections and corrective actions required if those limits are exceeded. That information is largely captured in the broad body SDP and VWA documentation provided during the audit, but not in a concise operator-friendly format. Prior to starting routine operations it would be useful to summarise that concisely to help ensure no confusion arises.
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