



EPBC 2019/8520 Spoilbank Marina

Annual Compliance Report 2022

A1097614

August 2022



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EXECUTIVE SUMMARY

This document forms the Annual Compliance Report (**ACR**) as required under Condition 14 of *Environmental Protection and Biodiversity Conservation* (**EPBC**) *Act 1999* approval (EPBC 2019/8520) for the Spoilbank Marina Project.

This ACR has been prepared by Pilbara Ports Authority (**PPA**), the approval holder and nominated developer, for Spoilbank Marina Project development activities undertaken during the period 8 June 2021 to 7 June 2022 (**the Reporting Period**).

PPA was compliant with all implementation conditions of EPBC2019/8520 during the Reporting Period. During the Reporting Period, Project construction activities occurred exclusively in the zone above the mean high-water mark, where there was no potential impact to protected matters under the EPBC Act or EPBC 2019/8520. Project construction activities included work on the outer and inner revetment wall, Spoilbank Marina basin and boat ramp. No Project marine construction activities were undertaken below the mean high-water mark (i.e., dredging, piling or construction of the outer breakwater) during the Reporting Period.

This ACR was prepared in accordance with the Department of Climate Change, Energy, the Environment and Water (**Department**) Annual Compliance Report Guidelines (2014) and will be published on PPA's website on or before 31 August 2022

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Declaration of Accuracy

In making this declaration, I am aware that sections 490 and 491 of the *Environment Protection* and *Biodiversity Conservation Act 1999* (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that to the best of my knowledge, all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed:

Full name: NROGER

ROSER JOHNSTON

Position:

CEO

Organisation: Pilbara Ports Authority - ABN 94 987 448 870

Date: 26/8/2022



1. INTRODUCTION

Pilbara Ports Authority (**PPA**) has been nominated as the Developer of the Port Hedland Spoilbank Marina (**Project**), a government initiative originally led by the Department of Transport (**DoT**) in partnership with the Town of Port Hedland (**ToPH**). The Project is located In Port Hedland, Western Australia, on the western side of the spoil bank sand formation, which is a man-made coastal landform created in the late-1960s and early-1970s as a result of disposing dredge material associated with Port Hedland's inner harbour development.

The Project includes development of a marina basin, rock armoured breakwaters, a dredged access channel, boat pens, a boat ramp and landside infrastructure such as carparks, amenities, public open space, lighting, paths, and landscaping.

The implementation of the Project began in 2021 with the commencement of the mobilisation of equipment to the construction site on the 8 June 2021 (commencement date), and first ground disturbance activities commencing soon after.

Upon completion of the first Reporting Period (8 June 2021 to 7 June 2022) no marine construction activities have occurred, with all works occurring landside of the mean high-water mark. This includes excavation of the marina basin and the construction of the inner and outer revetment walls (shown in figures 1, 2 & 3). Dredging and marine structure works, including the boat launching facility, mooring pens, fixed public jetty and navigation aids are expected to begin in August or September 2022.

This report has been prepared to meet Condition 14 of EPBC 2019/8520, whereby the approval holder must prepare an Annual Compliance Report (**ACR**) for each 12-month period following the date of commencement of the action. This ACR, and subsequent reports, will be made publicly available and published on PPA's website until the expiry of this approval on 19 February 2065. PPA will notify the Department of Climate Change, Energy, the Environment and Water (**Department**) of the publication of each ACR.

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Figure 1: Aerial image showing excavations works in the marina basin, rock revetments and rock storage onsite at the end of the Reporting Period (July 2022).



Figure 2: Construction works in the marina basin and inner rock revetments at the end of the Reporting Period, image facing north (July 2022).

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Figure 3: Construction progress of the rock revetment in the marina basin at the end of the Reporting Period, image facing west (July 2022).

2. COMPLIANCE AUDIT TABLE AND CURRENT COMPLIANCE STATUS

During the Reporting Period, PPA was responsible for ensuring compliance with the implementation conditions of EPBC 2019/8520. Table 1 presents a summary of PPA's compliance to each of those implementation conditions for the Reporting Period.

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Table 1: EPBC 2019/8520 Spoilbank Marina - Annual Compliance Audit table

ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
Enviro	onment Protection and Biodiversity Conservation Act 1999 (Cth) Approval De	cision Notice (2019/8520) – Conditions
C1	Condition 1 To minimise impacts to protected matters, the approval holder must not remove or modify more than: a) 15 ha of Flatback Turtle inter-nesting habitat; b) 2.3 ha of Green Turtle foraging habitat; and c) 10 ha of Green Sawfish foraging habitat, within the project area.	Compliant.	During the Reporting Period (the first year of construction which was from 8 June 2021 to 7 June 2022) , no habitat was removed which would impact protected matters. No marine construction activities occurred during that time with all works occurring landside of the mean high-water mark as shown in Annexure A.
C2A	Condition 2A To minimise impacts to protected matters, the approval holder must not undertake any marine construction activities during the following dates and times for the period of the approval: a) Flatback Turtle peak nesting period, between 1 December and 31 March. b) Green Sawfish key movement period, between the hours of 19:00 and 07:00.	Compliant.	 a) No marine construction activities occurred during Flatback Turtle peak nesting period, between 1 December and 31 March. All works occurred landside of the mean high water mark as shown in Annexure A. b) No marine construction activities occurred during, Green Sawfish key movement period, between the hours of 19:00 and 07:00. All works occurred landside of the mean high water mark as shown in Annexure A.
C3	Condition 3 To minimise impacts to protected matters, the approval holder must not dredge outside of the dredge area. If any dredge material is disposed of offshore, this must be undertaken in accordance with all requirements of a Permit issued under the Environmental Protection (Sea Dumping) Act 1981.	Not applicable.	No dredging activity has occurred during Reporting Period. Dredging activities are expected to start August 2022.
C4	Condition 4 To ensure that marine construction activities and construction do not significantly impact protected matters, the approval holder must implement the Dredging Environmental Management Plan (DEMP) and Construction Environmental Management Plan (CEMP).	Not applicable.	The DEMP has not been implemented as no dredging has occurred during the first year of construction. The CEMP has been implemented with weekly inspections for compliance. An example of an inspection record is shown in Annexure B.

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
C5	Condition 5 The approval holder must submit an Operatio Management Plan (OEMP), at least three mo anticipated commencement of the operation of the Minister's approval to ensure that the operation does not significantly impact protected OEMP must:	onths prior to the of the marina, for eration of the	The Project remained under construction during the Reporting Period. Commencement of the operation of the Marina is not expected until December 2023 and an OEMP has not yet been prepared and submitted to the Minister for approval.
	a) include an Artificial Lighting Manage (ALMP) that ensures artificial lighting the operation of the marina does not Flatback Turtle nesting on Cemetery ALMP must be consistent with the D National Light Pollution Guidelines for including Marine Turtles, Seabirds at Shorebirds (2020) and include:	g associated with impact upon Beach. The epartment's or Wildlife	
	i. the finalised artificial lighting marina;	design of the	
	ii. justification of how the propos prevent impacts to Flatback 7 on Cemetery Beach;		
	iii. a monitoring and reporting princludes baseline data that me reporting will be evaluated agundertaken for a minimum lespost commencement of operamarina to provide certainty the lighting of the marina is not in Flatback Turtle hatchlings or Cemetery Beach; and	nonitoring and gainst, to be ngth of two years ation of the nat the artificial mpacting	
	iv. management measures and actions to be implemented sh		

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
	indicate that the marina's artificial lighting is likely to impact Flatback Turtle hatchlings on Cemetery Beach.		
	b) Include a Sediment Management Plan (SMP) that ensures anthropogenic activities of the action do not result in, or contribute to, the denuding of Cemetery Beach. The SMP must include measures to monitor for denuding of Cemetery Beach and specify intervention measures to be implemented should denuding of Cemetery Beach be predicted or detected as a result of:		
	i. anthropogenic activities; and/or		
	ii. environmental factors in combination with anthropogenic activities.		
	c) Include a Marine Environment and Water Quality Management Plan (MEWQMP) that addresses how marine water quality, sediment quality and accumulation of marine debris will be monitored and managed to prevent impacts to protected matters from the operation of the marina. The MEQWMP must specify and justify the quality indicators to be monitored and timing of monitoring to prevent impacts to protected matters, including specific trigger criteria and limits, and clear, detailed corrective actions that will be implemented to prevent impacts to protected matters should trigger criteria and limits be reached.		

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
C6	Condition 6 The approval holder must not commence operation of the marina unless the Minister has approved the OEMP in writing. If the Minister approves the OEMP then the approved OEMP must be implemented.	Not applicable.	The Project remains under construction and the commencement of the operation of the Marina is not expected until December 2023. The OEMP is yet to be finalised and submitted to the Department. The commencement of the operation of the Marina is not expected until December 2023.
C7	Condition 7 All plans required under these conditions must be consistent with the Department's Environmental Management Plan Guidelines, and must include: a) The environmental objectives, relevant protected matters and a reference to EPBC Act approval conditions to which the plan refers; b) A table of commitments made in the plan to achieve the objectives, and a reference to where the commitments are detailed in the plan; c) Reporting and review mechanisms, and documentation standards to demonstrate compliance with the commitments made in the plan; d) An assessment of risks to achieving the environmental objectives and risk management strategies that will be applied; e) Impact avoidance, mitigation and/or repair measures, and their timing; and f) A monitoring program, which must include: i. measurable performance indicators; ii. trigger values for corrective actions; iii. the timing and frequency of monitoring to detect trigger values and changes in the performance indicators; and iv. proposed corrective actions, if trigger values are reached.	Not applicable.	The CEMP and DEMP have been submitted to the Department and subsequently been approved for use on the Spoilbank Marina Project. A revised action management plan (RAMP) CEMP was submitted to the minister 28 March 2022 (A1065284). Acknowledgement of the RAMP was received from the Department on 6 April 2022 (A1065283). A revised DEMP was submitted to the minister 26 July 2021 (A973481). Approval of the DEMP was received from the Department on 30 November 2021 (A1013807).

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
	B – Standard administrative conditions cation of date of commencement of the action		
C8	Condition 8 The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action. The approval holder must notify the Department in writing of the date of commencement of the operation of the marina within 10 business days after the date of commencement of the operation of the marina.	Compliant.	The Department was notified of the commencement of action via letter on 17 June 2021. Acknowledgement of commencement was received from the Department on 21 June 2021. (A959379)
C9	Condition 9 If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Compliant	The action commenced on 8 June 2021.
Comp	liance records		
C10	Condition 10 The approval holder must maintain accurate and complete compliance records.	Compliant.	PPA maintains a document management system (DMS) where all documents, including compliance records, are maintained.
C11	Condition 11 If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Compliant.	No requests were made by the Department during the Reporting Period.
Subm	ission and publication of plans	•	
C12	Condition 12 The approval holder must: a) submit plans electronically to the Department;	Compliant.	a) The CEMP and DEMP have been submitted to the Department and subsequently been approved for use on the Spoilbank Marina Project.

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
	 b) unless otherwise agreed to in writing by the Minister, publish each plan on the website within 20 business days of the date: i. of this approval, if the version of the plan to be implemented is specified in these conditions; or ii. that the plan is submitted to the Department, if the plan does not require the approval of the Minister but was not finalised before the date of this approval; or iii. that the plan has been approved by the Minister in writing, if the plan requires the approval of the Minister; c) exclude or redact sensitive ecological data from plans published on the website or provided to a member of the public; and d) keep plans published on the website until the end date of this approval. 		A RAMP (CEMP) was submitted to the minister 28 March 2022 (A1065284). Acknowledgement of the RAMP was received from the Department on 6 April 2022 (A1065283). A revised DEMP was submitted to the minister 26 July 2021 (A973481). Approval of the DEMP was received from the Department on 30 November 2021 (A1013807). b) PPA has published all plans on the website: DEMP A1013028 & A1013027 CEMP c) There is no sensitive ecological data redacted from the plans d) All plans will remain published on PPA's website until the end date of this approval.
C13	Condition 13 The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under a plan, is prepared in accordance with the Department's <i>Guidelines for biological survey and mapped data</i> (2018) and submitted electronically to the Department in accordance with the requirements of the plan.	Not applicable.	No monitoring data of species listed under the EPBC Act has been recorded during the Reporting Period. Further, no marine construction activity which would have the potential to disturb listed species has occurred, with all works taking place landside of the mean high water mark as shown in Annexure A. The spatial data within Annexure A was prepared in accordance with the Department's <i>Guidelines for biological survey and mapped data</i> (2018) and is available upon request.
Annua	al compliance reporting		
C14	Condition 14 The approval holder must prepare a compliance report for each 12 month period following the date of commencement of	Compliant	This is the first Annual Compliance Report and will be published on the PPA website in accordance with this

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
	the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: a) publish each compliance report on the website within 60 business days following the relevant 12 month period; b) notify the Department by email that a compliance report has been published on the website and provide the weblink and documentary evidence providing proof of the date of publication for the compliance report within five business days of the date of publication; c) keep all compliance reports publicly available on the website until this approval expires; d) exclude or redact sensitive ecological data from compliance reports published on the website; and e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.		condition. There was no excluded or redacted sensitive ecological data from the Report. The action commenced on 8 June 2021. Please note the first Annual Compliance Report is due to be published on the website by 31 August 2022.
-	ting non-compliance	I	T.,
C15	Condition 15 The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: a) any condition which is or may be in breach; b) a short description of the incident and/or non-compliance; and c) the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the	Compliant.	No incident; non-compliance with the conditions; or non-compliance with the commitments made in plans has occurred during the Reporting Period.

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
	exact information cannot be provided, provide the best information available.		
C16	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b) the potential impacts of the incident or non-compliance; and c) the method and timing of any remedial action that will be undertaken by the approval holder.	Compliant.	No incident; non-compliance with the conditions; or non-compliance with the commitments made in plans has occurred during the Reporting Period.
Indepe	endent audit		
C17	The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister.	Compliant.	No request has been made by the Minister for auditing.
C18	For each independent audit, the approval holder must: a) provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b) only commence the independent audit once the audit criteria have been approved in writing by the Department; and c) submit an audit report to the Department within the timeframe specified in the approved audit criteria.	Compliant.	No request has been made by the Minister for auditing.
C19	The approval holder must publish the audit report on the website within 10 business days of receiving the	Compliant.	No request has been made by the Minister for auditing.

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
	Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.		
Revisi	on of action management plans		
C20	Condition 20 The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister under conditions 4 and 5, or as subsequently revised in accordance with these conditions, by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the approval holder must implement the RAMP in place of the previous action management plan.	Compliant	A RAMP (CEMP) was submitted to the Minister 28 March 2022 (A1065284). Acknowledgement of the RAMP was received from the Department on 6 April 2022 (A1065283). A revised DEMP was submitted to the Minister 26 July 2021 (A973481). Approval of the DEMP was received from the Department on 30 November 2021 (A1013807).
C21	Condition 21 The approval holder may choose to revise an action management plan approved by the Minister under conditions 4 and 5 or as subsequently revised in accordance with these conditions, without submitting it for approval under section 143A of the EPBC Act, if the taking of the action in accordance with the RAMP would not be likely to have a new or increased impact.	Compliant	A RAMP (CEMP) was submitted to the Minister 28 March 2022 (A1065284). PPA considers that in taking the action in accordance with the RAMP would not be likely to have a new or increased impact. Acknowledgement of the RAMP was received from the Department on 6 April 2022 (A1065283).
C22	Condition 22 If the approval holder makes the choice under condition 21 to revise an action management plan without submitting it for approval, the approval holder must: a) notify the Department in writing that the approved action management plan has been revised and provide the Department with: i. an electronic copy of the RAMP;	Compliant	A RAMP (CEMP) and cover letter which addressed condition 22 (a) was submitted to the Minister 28 March 2022 (A1065284). Acknowledgement of the RAMP was received from the Department on 6 April 2022 (A1065283). (b) The RAMP was implemented 2 May 2022 .

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE
	 ii. an electronic copy of the RAMP marked up with track changes to show the differences between the approved action management plan and the RAMP; iii. an explanation of the differences between the approved action management plan and the RAMP; iv. the reasons the approval holder considers that taking the action in accordance with the RAMP would not be likely to have a new or increased impact; and v. written notice of the date on which the approval holder will implement the RAMP (RAMP implementation date), being at least 20 business days after the date of providing notice of the revision of the action management plan, or a date agreed to in writing with the Department. b) subject to condition 24 implement the RAMP from the RAMP implementation date. 		
C23	The approval holder may revoke their choice to implement a RAMP under condition 21 at any time by giving written notice to the Department. If the approval holder revokes the choice under condition 21, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 21.	Not applicable.	PPA has not revoked their choice to implement a RAMP.
C24	If the Minister gives a notice to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact, then: a) condition 21 does not apply, or ceases to apply, in relation to the RAMP; and	Not applicable.	No notice has been given by the Minister to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact.

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ITEM	COMMITMENT	COMPLIANCE	EVIDENCE		
	b) the approval holder must implement the action management plan specified by the Minister in the notice.				
C25	At the time of giving the notice under condition 24, the Minister may also notify that for a specified period of time, condition 21 does not apply for one or more specified action management plans.	Not applicable.	No notice has been given by the Minister to the approval holder that the Minister is satisfied that the taking of the action in accordance with the RAMP would be likely to have a new or increased impact.		
Comp	Completion of the action				
C26	Within 20 business days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not applicable.	The Action is not expected to be completed until December 2023.		

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3. NON-COMPLIANCES AND CORRECTIVE AND PREVENTATIVE ACTIONS

PPA was compliant with all conditions of EPBC 2019/8520 during the Reporting Period.

4. PUBLIC AVAILABILITY AND FUTURE ANNUAL COMPLIANCE REPORTSPPA will make a copy of this report publicly available on PPA's website (www.pilbaraports.com.au).

The next ACR for the Project will be made available on PPA's website on or before 31 August 2023 in accordance with Condition 14 of EPBC 2019/8520.

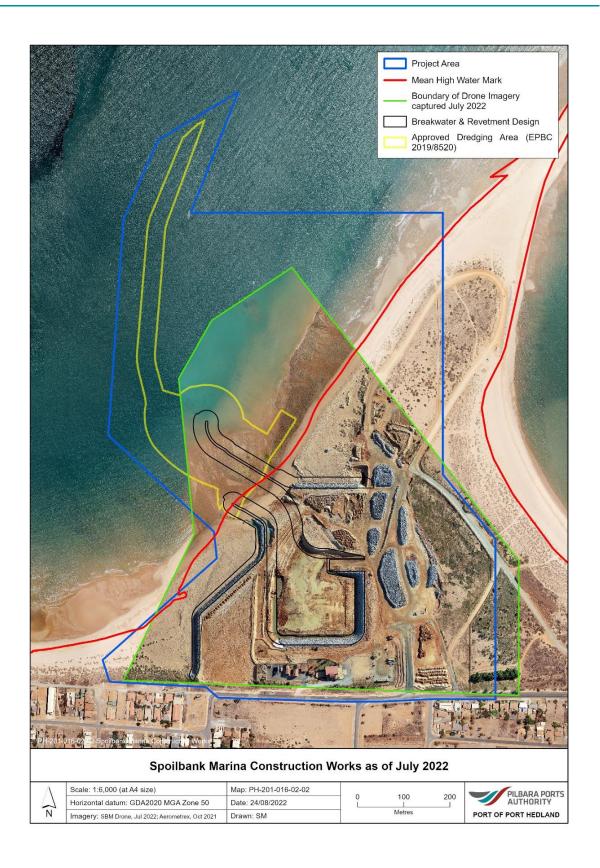
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ANNEXURE A

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ANNEXURE B

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ENVIRONMENTAL INSPECTION FORM



SECTION 1: INSPECTION DETAILS								
Inspe	Inspection Site: Spoilbank M		arina_	Inspection Date:		06/05/2022		
Inspe	spection Type CEMP Compliance		Instrur	Instrument Ref:				
Inspected by: AS		Po		Position:	<u>EA</u>			
			ley@pilbarapo	rt				
	Email: s.com.au			Phone:		0447 079 273		
	Site Rep/s: AS, JF, DW, GS, PB			Position:	Env, PM, Safety, MGN			
SECT	SECTION 2: SUMMARY OF INSPECTION / SITE ACTIVITY							
Stockp	Excavation of material from basin. Stockpiling material from basin onsite.							
	nstalled acro		atter of basin.					
		orthern area.						
SECT	TON 3: AC	TIONS SUM	MADV					
SECT	ION J. AC						Deignites	
		Action	•		Accountability Priority		Priority	
Monitor dust conditions and ramp up watercart usa required.			usage as	MGN Ongoing		Ongoing		
SECT	SECTION 4: FOLLOW UP INSPECTION DETAILS							
Folloy	Follow up inspection required: □ Y ⊠ N Reason (if yes):							
	Tonon up mapocuon required. 🗀 T 🖾 IV — Reason (II yes).							
Date	e of follow u	p inspection	·					
SECT	TON 5: INS	PECTION C	HECKLIST					
	Item		Follow Up	Comments / Remedial A		edial Actions	Required	
1	EMISSIONS / DISCHARGES							
1.1	Dust		□Y⊠N	Monitor dust conditions and ramp up watercart usage as required.				
1.2	Noise / vibr	ration	□Y⊠N					
1.3	Surface / w water	aste / storm	□Y⊠N					
1.4	Light Spill		□Y⊠N					

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ENVIRONMENTAL INSPECTION FORM



SECTION 5: INSPECTION CHECKLIST						
Item		Follow Up	Comments / Remedial Actions Required			
2	HYDROCARBONS AND HAZARDOUS SUBSTANCES					
2.1	Storage / Containment	□Y⊠N	No issues observed.			
2.2	Contaminated soils	□Y⊠N				
2.3	Spills / Spill equipment	□Y⊠N				
3	WASTE MANAGEMENT / HOUSEKEEPING					
3.1	Waste segregation □ Y ⊠ N					
3.2	Storage / Disposal – Controlled	□Y⊠N	No issues observed			
3.3	General housekeeping	□Y⊠N				
4	SURPLUS MATERIAL MANAGEMENT					
4.1	Material stockpiled appropriately	□Y⊠N	No issues observed			
4.2	Material tracking data received	□Y⊠N				
	SUSTAINABILITY					
5.1	Water	□Y⊠N				
5.2	Power	□Y⊠N	No issues observed			
5.3	Other	\square Y \boxtimes N				
6	FLORA / FAUNA					
6.1	Vegetation clearing / weeds	□Y⊠N				
6.2	Wildlife / Pests	□Y⊠N	No issues observed			
6.3	Marine Fauna □ Y ⊠ N					
7	HERITAGE					
7.1	Heritage sites identified / protected	□Y⊠N	No issues observed			
8	ADMINISTRATION	ADMINISTRATION				
8.1	Construction Environmental Management plan/s current and with PPA	□Y⊠N	No issues observed			

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ENVIRONMENTAL INSPECTION FORM



SECT	SECTION 5: INSPECTION CHECKLIST			
8.2	Appropriate risk assessment and controls in place for observed activity	□Y⊠N		
8.3	Incident reporting, management and communication	□Y⊠N		

Figure 1- Rock installed across southern batter of basin.



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ENVIRONMENTAL INSPECTION FORM



Figure 2- Spill kit placed in northern area



Figure 3- Excavation of material from basin.



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ENVIRONMENTAL INSPECTION FORM



Figure 4 - Stockpiling material from basin onsite.



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ENVIRONMENTAL INSPECTION FORM



APPENDIX 1: ACTION PRIORITY CATEGORIES						
Category	Timeframe for Completion	Examples ¹				
High	Within 12 hours	Dust emissions, potential discharges from a prescribed premise, hydrocarbon spills.				
Moderate	Within 48 hours	Bulk product spills outside of bunded areas, sumps close to capacity.				
Low	Within one week	Housekeeping items, emptying skip bins.				
Ongoing	Routine action, to be completed next time task is scheduled.	Road sweeping, outload circuit wash down.				
Improvement Opportunity	As per improvement	Sealing areas where spills are common, improving waste segregation, reducing water and energy consumption, actions that will aid in maintaining licence compliance.				

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¹ Examples are not exclusive and may be interchangeable between categories. Examples are to be used as a guide only.