

# Annual Compliance Report

Alkimos Desalination Plant

EPBC Approval 2019/8453

8 November 2023 to 7 November 2024

13 March 2025

# 1 Document Information

<b>Report Title</b>	<b>Alkimos Desalination Plant - EPBC 2019/8453 - Annual Compliance Report 2023-2024</b>
<b>Document Reference</b>	<u>185732719</u>
<b>Project name</b>	Alkimos Desalinisation Plant, Alkimos WA
<b>EPBC Number</b>	2019/8453
<b>Proponent /approval holder and ACN or ABN</b>	Water Corporation ACN: 28 003 434 917
<b>Approved Action</b>	<p>Approved Action: To construct, operate and decommission:</p> <ul style="list-style-type: none"> <li>• a seawater desalination plant of about 100 gigalitre (GL) per annum capacity, and</li> <li>• a groundwater treatment plant of about 6 GL per annum capacity within the Alkimos Water Precinct, approximately 40 km northwest of Perth,</li> <li>• tunnels beneath the seabed containing a seawater intake pipeline about 2.46 km long and a separate brine outfall pipeline about 3.99 km long, both with vertical risers, and</li> <li>• a pipeline about 33 km long from the seawater desalination plant to the Wanneroo Reservoir and other distribution points along the pipe route.</li> </ul>
<b>Location of the Action</b>	Alkimos, Western Australia

## Revision History

Rev No.	Date	Author	Reviewer	Key Changes
Rev A	25 Feb 2025	S. Nicholson	A. Thorburn F. Rowland D. Short D. Rossi C. McLeod	Internal review
Rev 0	13 Mar 2025	S. Nicholson	C. McLeod	DCCEEW Submission

## 2 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 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  \_\_\_\_\_

Digby Short

Head of Environment

Water Corporation ABN 28 003 434 917

13 March 2025

# Contents

1	Document Information .....	2
2	Declaration of accuracy .....	3
3	Introduction .....	5
3.1	Background	5
3.2	Environmental Approvals	5
4	Purpose and Scope .....	5
5	Non-compliance .....	6
5.1	Non-compliance # 1	6
5.2	Non-compliance #2	7
6	Audit Table .....	8
7	Figures .....	17
8	Appendices.....	20

## List of Figures

Figure 1: EPBC 2019/8453 Extent of Tuart TEC Clearing (2024).....	18
Figure 2: EPBC 2019/8453 Extent of Black Cockatoo Habitat Clearing (2024) .....	19

## List of Tables

Table 1 Audit codes and descriptions.....	8
Table 2: EPBC 2019/8453 Condition Audit Table.....	9

## List of Appendices

Appendix 1: Audit of Alkimos Terrestrial Construction Environment Management Plan .....	21
Appendix 2: Audit of Alkimos Water Precinct Environmental Management Plan .....	22
Appendix 3: Email Submission of Artificial Nest Hollow Management Plan .....	23
Appendix 4: Email Submission of Alkimos, Carabooda and Eglinton Offset Management Plans.....	24
Appendix 5: DBCA Letter - Confirmation of Neergabby Site as Conservation Estate .....	25
Appendix 6: Notification of Commencement of the Action .....	26
Appendix 7: DCCEEW Request for Compliance Records – Water Corporation Response.....	27
Appendix 8: Shapefile of Clearing of Protected Matters 2023-2024 .....	28

## 3 Introduction

### 3.1 Background

The Alkimos Seawater Desalination Plant (ASDP) (the Action) is currently being constructed as an additional drinking water supply into Perth's Integrated Water Supply Scheme. It includes the 100 gigalitres (GL) per annum seawater desalination plant and a 6 GL per annum groundwater treatment plant at the Alkimos water precinct. The source water for the desalination process will be delivered through the construction of a ~33 km pipeline from the desalination plant to the Wanneroo Reservoir, and other significant distribution points along the pipe route.

By-products of the desalination process will be returned further offshore to the marine environment through a separate pipeline.

Construction commenced on 8 November 2023 after approvals were obtained under the *Environmental Protection Act 1986* (EP Act) and the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

### 3.2 Environmental Approvals

The Action was approved, subject to conditions, under the EPBC Act on the 8 November 2023 (EPBC ref 2019/8453) and amended on 1 July 2024. An application to amend the conditions was submitted on 18 October 2024 but has not been approved at the time of this document.

## 4 Purpose and Scope

In accordance with condition 33 of the Approval, "33) *the approval holder must prepare a compliance report for each 12-month period following the date of this approval decision (or as otherwise agreed to in writing by the Minister).*"

This Annual Compliance Report (ACR) has been prepared by to address the annual reporting requirements under the EPBC Act approval 2019/8453.

This annual compliance report addresses the required reporting period from the 8 November 2023 to 7 November 2024.

Conditions 34 to 36 outline the required content for the ACR, and reads:

34) *Each compliance report must be consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.*

35) *Each compliance report must include:*

- a) *Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.*
- b) *One or more shapefile showing all clearing of protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.*
- c) *A schedule of all plans in existence in relation to these conditions and accurate and complete details of how each plan is being implemented.*

36) *The approval holder must:*

- a) Submit the compliance report to the department within 60 business days following the end of the 12 month calendar year period for which that compliance report is required.*
- b) Publish each compliance report on the website within 90 business days following the end of the 12-month period for which that compliance report is required.*
- c) Notify the department electronically, within 20 business days of the date of publication that a compliance report has been published on the website.*
- d) Provide the weblink for the compliance report in the notification to the department.*
- e) Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.*
- f) Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.*
- g) If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 20 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.*

## **5 Non-compliance**

### **5.1 Non-compliance # 1**

Within the reporting period, there were two non-compliances resulting from one incident with EPBC Approval 2019/8453. Approximately 0.104 ha of land outside of the action area was indirectly impacted by the action. Windblown sand from within the action area deposited on vegetation outside of the action area. The non-compliances are with conditions 1 and 4: Condition 1 of EPBC Approval 3019/8453 states: *“To avoid and mitigate harm to protected matters, the approval holder must not take the Action outside the Action area.”*

Condition 4: *“To avoid and mitigate harm as a result of the Action on protected matters during construction, the approval holder must implement the Terrestrial Construction Environmental Management Plan from the commencement of the Action until the expiry date of this approval”*

- *Terrestrial Construction Environmental Management Plan Objective 4.1.2: “Prevent impacts to native vegetation outside of the approved clearing area”*

The non-compliance was identified on 30 January 2024 and was reported to DCCEEW on the 1 February 2024. The reporting of this non-compliance complied with the 2 business day notification period, as specified in Condition 37, which states:

Condition 37: *“The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan”.*

The following contingency measures were undertaken to mitigate the non-compliance:

- Silt fencing (shade cloth) was installed along the northern boundary of the Development Envelope to mitigate any further wind erosion of sand beyond the action area – completed on 2 February 2024.
- Stabilisation of the sand beyond the action area and the surrounding area was applied using lignosulphonate, a product specifically designed for dust and erosion control – completed on 2 February 2024.
- A specialist revegetation contractor (Tranen Revegetation Systems) inspected the impacted area on 14 of February 2024 to view the extent of the impact and provide recommendations to stabilise and restore the environmental values of the impacted area.
- The deposited sand outside of the Development Envelope was removed in the steepest areas to shallow the grade and ensure a more stable surface. Removal was undertaken by excavators with spotters and manual labour (shovelling) using shallow cuts from within the action area to prevent further damage to vegetation outside the action area – completed on 24 February 2024.
- Hydromulch and erosion control blankets were applied (e.g. jute matting) to the impacted area to stabilise the surface and prevent further encroachment – completed on 26 March 2024.
- Revegetation of the impacted area outside of the action area was undertaken to create a long-term stabilised surface – completed by Tranen Revegetation Systems in September 2024.

The following adaptive management measures were included in the site management measures as a result of the non-compliance:

- Silt fencing is monitored daily for damage and effectiveness, and the accumulated sand is removed as per daily inspection schedule (item 3) – ongoing.
- The daily inspection schedule has been updated to cover the entire site boundary (both active and non-active work fronts) and includes particular attention to erosion impacts outside of the action area – ongoing.
- The project risk register was updated to include wind erosion as an indirect risk to boundary breaches – completed on 2 February 2024.
- A program change was made to the cut earthworks within the northern boundary of the site to reduce the potential for additional erosion and sand deposition outside of the action area – commenced on 12 of February 2024 and completed on 24 of March 2024.

## 5.2 Non-compliance #2

A minor administrative non-compliance was identified on 28 of January 2025. Whilst the minor non-compliance was identified outside of the reporting period, it occurred in October 2024, which is within the reporting period. The minor non-compliance was with condition 27A, for failure to notify the department within 2 days of a proposed change to the Western Australian approval conditions.

*Condition 27A: “The approval holder must notify the department in writing of any proposed change to the conditions of the Western Australian approval that may related to protected matters within 2 business days of formally proposing a change and within 5 business days of becoming aware of any proposed change.”*

Water Corporation submitted a proposal to amend the Western Australian approval conditions (Ministerial Statement 1207) to the Environmental Protection Authority on 8 of October 2024 and notified DCCEEW on 18 October 2024, outside of the 2 day notification period required by condition 27A.

DCCEEW were notified of the minor non-compliance in writing on 28 of January 2025 (letter ref: 187564447). The follow up report and corrective actions were provided in writing on 3 February 2025. The root cause of the minor non-compliance was due to a lack of process to trigger a notification to DCCEEW when an amendment to the Western Australian approval is proposed. This has been rectified by the project planner template, updated to include a separate activity ‘Notify DCCEEW of proposal to change to WA conditions’ and ‘Notify DCCEEW of approved change to WA conditions’, that is automatically linked when preparing any future Western Australian approval amendments.

The reporting of this non-compliance complied with the 2-business day notification period, as specified in Condition 37.

## 6 Audit Table

The compliance status against each of the conditions of EPBC 2019/8453 is provided in Table 2.

A description of the status terminology used is provided below in Table 1.

**Table 1 Audit codes and descriptions**

Compliance Status Term	Acronym	Definition
<b>Compliant</b>	C	Implementation of the Action has been carried out in accordance with the requirements of the audit element.
<b>Completed</b>	CLD	A requirement with a finite period of application has been satisfactorily completed.
<b>Not required at this stage</b>	NR	The requirements of the audit element were not triggered during the reporting period.
<b>Potentially non-compliant</b>	PNC	Possible or likely failure to meet the requirements of the audit element.
<b>Non-compliant</b>	NC	Implementation of the Action has not been carried out in accordance with the requirements of the audit element.
<b>In process</b>	IP	Where an audit element requires a management or monitoring plan be submitted to the Department and that plan is currently under review.

**Table 2: EPBC 2019/8453 Condition Audit Table**

No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
1	1) To avoid and mitigate harm to protected matters, the approval holder must not take the Action outside the Action area.		NC	See Section 5.1 Non-compliance # 1
2	2) To avoid and mitigate harm to protected matters, the approval holder must not clear more than:	a) 1.16 hectares (ha) of Tuart TEC	C	0.18 ha cleared in the reporting period. See Figure 1 for extent of clearing in development envelope.
		b) 1.7 ha of Banksia Woodland TEC	C	0 ha cleared in the reporting period.
		c) 52.1 ha of Black cockatoo habitat for Carnaby's Black Cockatoo ( <i>Zanda latirostris</i> listed as <i>Calyptorhynchus latirostris</i> )	C	28.85 ha cleared in the reporting period. See Figure 2 for extent of clearing in development envelope.
		d) 49.8 ha of Black cockatoo habitat for Forest Red-tailed Black Cockatoo ( <i>Calyptorhynchus banksia naso</i> )	C	28.85 ha cleared in the reporting period. See Figure 2 for extent of clearing in development envelope.
		e) 96 potential nesting trees, and	C	15 potential nesting trees cleared in the reporting period. See Figure 2 for extent of clearing in development envelope.
		f) 8 Black Cockatoo nest hollow trees	C	2 suitable trees cleared in the reporting period. See Figure 2 for extent of clearing in development envelope.
3	3) To avoid and mitigate impacts to protected matters, the approval holder must comply with the following Western Australia approval conditions where relevant to protected matters:	a) Condition A1-1 (Limitations and extent of proposal)	C	The Western Australian approval conditions have been complied with. A copy of the Compliance Assessment Report for Ministerial Statement 1207, for the period July 2023 to June 2024, is available for public download at <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a>
		b) Conditions B1-1, B1-2 and B1-3 contained in B1 (Flora and Vegetation)		
		c) Conditions B2-1 and B2-2 contained in B2 (Terrestrial Fauna), and		
		d) Conditions B6-1 and B6-2 contained in B6 (Marina Fauna)		
4	4) To avoid and mitigate harm as a result of the Action on protected matters during construction, the approval holder must implement the Terrestrial Construction Environmental Management Plan from the commencement of the Action until the expiry date of this approval.		C	Terrestrial Construction Environmental Management Plan (Rev 6) has been implemented following commencement of works on 20 November 2023. Refer to Appendix 1: Audit of Alkimos Terrestrial Construction Environment Management Plan.
5	5) To avoid and mitigate harm as a result of the Action on protected matters during operation, the approval holder must implement the Alkimos Water Precinct Environmental Management Plan from the commencement of construction until the expiry date of this approval.		C	Alkimos Water Precinct Environmental Management Plan (Rev 1) has been implemented following commencement of works on 20 November 2023. Refer to Appendix 2: Audit of Alkimos Water Precinct Environmental Management Plan
6	6) To avoid and mitigate harm to protected matters, the approval holder must submit a Construction Marine Environmental Management Plan to the department for the Minister's approval. The approval holder must not commence the action within the marine environment unless the Minister has approved the Construction Marine Environmental Management Plan in writing. The approval holder must implement the Construction Marine Environmental Management Plan approved by the Minister in writing until the expiry date of this approval.		NR	Construction Marine Environmental Management Plan currently in development. No works have occurred in the marine environment to date. Plan expected to be submitted in Q1 2025 prior to marine works scheduled for Q4 2025.
7	7) By implementing the Construction Marine Environmental Management Plan the approval holder must achieve the following environmental objectives:	a) Protect protected matters from adverse impacts of noise during construction of the tunnel and marine pipelines, including noise generated by vessels, and	NR	
		b) Protect protected matters from injury or death from construction of the tunnel and marine pipelines, including vessel strike.	NR	
8	8) The Construction Marine Environmental Management Plan must be consistent with the Environmental Management Plan Guidelines, and must include:	a) Details of the relevant protected matters and a reference to EPBC Act approval conditions to which the plan refers. The relevant protected matters are: i) Australian Sea Lion ii) Humpback Whale iii) Southern Right Whale.	NR	

No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
		<p>b) The measures and commitments that will be applied during construction to prevent impacts to marine protected matters and achieve the environmental objectives. Measures and commitments must consider:</p> <ul style="list-style-type: none"> <li>i) Avoid noise generated by construction in the marine environment during migration periods for the Australian Sea Lion, Humpback Whale and Southern Right Whale</li> <li>ii) Avoid negative brine discharge impacts to the Australian Sea Lion, Humpback Whale and Southern Right Whale</li> <li>iii) Avoid haul-out (resting) locations used by the Australian Sea Lion</li> <li>iv) Ensure that vessels do not travel at speeds greater than 10 knots when transiting or undertaking activities within the Action Area</li> <li>v) Ensure that vessels act consistently with Interacting with cetaceans and whale watching</li> <li>vi) Implement observation and shut down zones consistent with the EPBC Act Policy Statement 2.1 – Interaction between offshore seismic exploration and whales</li> <li>vii) Deploy at least two marine fauna observers whenever vessels are transiting or undertaking activities within the Action Area in order to maintain 360-degree observation of the observation zone and shut down zones at all times during hours of construction in the marine environment</li> <li>viii) Consult with, and implement the advice of, Australian Sea Lion experts at the Marine Science Program, Biodiversity and Conservation Science, DBCA</li> <li>ix) Respond to any death or injury of a protected matter, by immediately halting the works or machinery responsible, formally notifying the department within 5 business days of the incident and not resuming works until notified by the Minister in writing that these works may resume</li> </ul>	NR	
		c) A table of commitments made in the plan to achieve the environmental objectives, and a reference to exactly where these commitments are detailed in the plan.	NR	
		d) Reporting and review mechanisms to demonstrate compliance with the commitments made in the plan.	NR	
		e) An assessment of risks relating to achieving the environmental objectives and risk management strategies and/or mitigation measures that will be applied to address identified risks.	NR	
		f) Impact avoidance, mitigation and/or repair measures, and the timing of those measures.	NR	
		<p>g) A monitoring program, which must include:</p> <ul style="list-style-type: none"> <li>i) measurable performance indicators</li> <li>ii) trigger values for corrective actions</li> <li>iii) the timing and frequency of monitoring, ensuring monitoring is capable of detecting trigger values and changes in the performance indicators, and</li> <li>iv) proposed corrective actions if trigger values are reached.</li> </ul>	NR	
		h) Links to other relevant plans or conditions of approval (including Western Australia Approval conditions).	NR	
9	9) To mitigate harm as a result of the Action on protected matters, the approval holder must, within 6 months of the date of this approval decision, submit an Artificial Nest Hollow Management Plan to the department for the Minister's approval. The approval holder must implement the Artificial Nest Hollow Management Plan as and from when approved by the Minister in writing until the expiry date of this approval.		IP	Artificial Nest Hollow Plan submitted to DCCEEW via email on 7 May 2024 (Appendix 3). Plans are currently under review to address comments received 18 July 2024. Resubmission for approval anticipated after March 2025.
10	10) The Artificial Nest Hollow Management Plan must be consistent with the Environmental Management Plan Guidelines, and must:	<p>a) Be prepared by a suitably qualified ecologist</p> <p>b) Provide details of the relevant protected matters and a reference to EPBC Act approval conditions to which the plan refers. The relevant protected matters are:</p> <ul style="list-style-type: none"> <li>i) Black cockatoos, and</li> <li>ii) Black cockatoo nest hollow trees.</li> </ul>	IP	Plan currently not yet approved. Revised Artificial Nest Hollow Plan to be submitted after March 2025 for approval

No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
		<ul style="list-style-type: none"> <li>c) Identify the goals for the artificial nest hollows, including expected use by black cockatoos for nesting.</li> <li>d) Detail a pre-clearance survey to identify the number of suitable nest hollows to be removed during clearing.</li> <li>e) Specify the location for installation, based on the advice of DBCA, of artificial nest hollows</li> <li>f) Specify the design and number of artificial nest hollows to be installed, based on the advice of DBCA, the number totalling at least three times the number of suitable black cockatoo nest hollows to be cleared.</li> <li>g) Specify the installation methods, based on the advice of DBCA, to be used to install the artificial nest hollows.</li> <li>h) Specify the maintenance methods, based on the advice of DBCA, to be used to maintain the artificial nest hollows for a minimum of 105 years following installation.</li> <li>i) Specify a monitoring program, which must include: <ul style="list-style-type: none"> <li>i) Evaluating evidence that effectively determines progress towards, attainment and maintenance of ecological benefits for the protected matters</li> <li>ii) Measurable performance indicators to monitor attainment of the ecological benefits for the protected matters</li> <li>iii) Trigger values for corrective actions, and</li> <li>iv) The timing and frequency of monitoring to detect trigger values and changes in the performance indicators.</li> </ul> </li> <li>j) Propose corrective actions to ensure ecological benefits for the protected matters are attained or maintained if trigger values are reached or performance indicators not attained.</li> <li>k) Links to other relevant plans or conditions of approval (including Western Australia Approval conditions).</li> </ul>		
11	11) To compensate for the residual significant impacts of the Action on protected matters the approval holder must implement the Environmental Offsets Strategy.		C	Offset strategy in place. Offset management plans are currently under review and are anticipated to be resubmitted to DCCEEW after March 2025.
12	12) The approval holder must, within 6 months of the date of this approval of the Action, submit to the department, for approval by the Minister, an Offset Management Plan in respect of each offset site to be secured as specified in the Environmental Offsets Strategy.		IP	Alkimos, Carabooda Tank and Eglinton Offset management plans were submitted to DCCEEW on 2 May 2024 (Appendix 4). Plans are currently under review to address comments received 18 July 2024. Resubmission for approval anticipated after March 2025.
13	13) Each Offset Management Plan must meet the requirements of the Environmental Offsets Policy and the Environmental Management Plan Guidelines to the satisfaction of the Minister. Each Offset Management Plan must include:	<ul style="list-style-type: none"> <li>a) Summary information about the entire residual impacts of the Action on protected matters and how compensation for these impacts will be divided amongst the proposed offset sites.</li> <li>b) Detailed information on the residual impacts of the Action on protected matters that will be compensated for by the offset that is the subject of the particular Offset Management Plan (Note: the offset comprises the securement of the offset site and the habitat condition improvements to be achieved at the offset site). This must include the areas of habitat for protected matters and its condition and quality at all locations impacted by the Action which the offset is to address.</li> <li>c) The relevant protected matters and a reference to the EPBC Act approval conditions to which the Offset Management Plan refers.</li> <li>d) Detailed information and shapefiles specifying the location, area and boundaries of the proposed offset site described in that Offset Management Plan.</li> <li>e) Detailed baseline information on the areas of habitat, including their condition, and the presence (or not) of the protected matters on the proposed offset site.</li> </ul>	IP	In progress, Alkimos, Carabooda Tank and Eglinton Offset management plans were submitted to DCCEEW on 2 May 2024. Plans are currently under review to address comments received 18 July 2024. Resubmission for approval anticipated after March 2025.

No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
		<p>f) Commitments to achievable improved ecological benefits, including presence (or not) of the protected matters, at the offset site and the timeframes in which they will be achieved.</p> <p>g) A table summarising all commitments to achieve the proposed ecological benefits for protected matters at the offset site, and a reference to where each commitment is detailed in the Offset Management Plan.</p> <p>h) Reporting and review mechanisms to inform the department annually regarding compliance with the management and environmental outcome commitments, and attainment and maintenance of the ecological benefits specified in the Offset Management Plan.</p> <p>i) An assessment of risks to achieving the ecological benefit(s) and what risk management measures and/or strategies will be applied to address these.</p> <p>j) A monitoring program, which must specify:</p> <p>i) measurable performance indicators and the timeframes for their achievement to gauge attainment of the ecological benefits for the protected matters</p> <p>ii) trigger values for corrective actions, and</p> <p>iii) the proposed timing (including season/time of day/frequency) methods and effort, and an explanation of how these will be effective for this purpose, of monitoring to detect trigger values, changes in the performance indicators and to gather evidence that effectively demonstrates actual progress towards, attainment of and maintenance of the ecological benefits for the protected matters.</p> <p>k) Corrective actions to be implemented to ensure that the proposed ecological benefits for the protected matters are achieved or maintained, if trigger values are reached or performance indicators not achieved in the specified timeframes.</p> <p>l) Links to relevant referenced plans or conditions of approval (including Western Australian Approval conditions), and</p> <p>m) How the offset sites will be protected, and ecological benefits maintained, at least until the expiry of this approval.</p>		
14	14) If, at least 9 months after the date of this approval of the Action, the Minister notifies the approval holder, in writing, that the Minister refuses to approve one or more Offset Management Plans because the Minister is not satisfied that it meets the requirements of the Environmental Offsets Policy, the approval holder must cease all further clearing within 10 business days of receiving such notice. The approval holder may only restart clearing after the Minister has notified the approval holder that the Minister has approved all required Offset Management Plans, or as otherwise advised with the Minister in writing.		NR	No correspondence received from the Minister to date refusing to approve an Offset Management Plan.
15	15) To compensate for the residual significant impacts of the Action on protected matters the approval holder must secure each offset site specified in the Environmental Offsets Strategy within 2 years of commencement of the action. The approval holder must implement the Offset Management Plan in respect of each offset site specified in the Environmental Offsets Strategy as and from when approved by the Minister in writing and continue to implement every Offset Management Plan at least until the expiry date of this approval.		IP	Not required at this stage as 2 years from commencement of action is 8 November 2025. Securement of offsets via conservation covenant in progress for the Alkimos, Carabooda, Eglinton and Gobby Road offset sites (owned by the Water Corporation). The Neergabby offset site is owned by the Department of Biodiversity, Conservation and Attractions (DBCA). Water Corporation has entered into a Memorandum of Understanding with DBCA for the lots to be used by Water Corporation for offset purposes and for addition to the State of WA Conservation Estate – see Appendix 5.
16	16) The approval holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister, or as subsequently revised in accordance with the following 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.		NR	No variations or revisions to any action management plans during the reporting period.

No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
17	17) The approval holder may choose to revise an action management plan approved by the Minister under conditions 4, 5 and 6, 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.			
18	18) If the approval holder makes the choice under condition 17 to revise an action management plan without submitting it for approval, the approval holder must:	<p>a) Notify the department electronically that the approved action management plan has been revised and provide the department with:</p> <p>i) An electronic copy of the RAMP.</p> <p>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.</p> <p>iii) An explanation of the differences between the approved action management plan and the RAMP.</p> <p>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.</p> <p>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.</p> <p>b) Subject to condition 20, implement the RAMP from the RAMP implementation date.</p>		
19	19) The approval holder may revoke its choice to implement a RAMP under condition 17 at any time by giving written notice to the department. If the approval holder revokes the choice under condition 17, the approval holder must implement the action management plan in force immediately prior to the revision undertaken under condition 17			
20	20) If the Minister notifies 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:	<p>a) Condition 17 does not apply, or ceases to apply, in relation to the RAMP.</p> <p>b) The approval holder must implement the action management plan specified by the Minister in the notice</p>		
21	21) At the time of giving the notice under condition 20, the Minister may also notify that for a specified period of time, condition 17 does not apply for one or more specified action management plans. Note: Conditions 17-21 are not intended to limit the operation of section 143A of the EPBC Act which allows the approval holder to submit a revised action management plan, at any time, to the Minister for approval.			
22	22) The approval holder must submit all plans required by these conditions electronically to the department.		C	All plans have been submitted electronically via email.
23	23) Unless otherwise agreed to in writing by the Minister, the approval holder must publish each plan on the website within 15 business days of the date:	<p>a) of this approval, if the version of the plan to be implemented is specified in these conditions, or</p> <p>b) the plan is approved by the Minister in writing, if the plan requires the approval of the Minister, or</p> <p>c) the plan is submitted to the department in accordance with a requirement of these conditions, if the plan does not require the approval of the Minister.</p>	C C C	All approved management plans have been published within the relevant timeframes on the Water Corporation Alkimos project website ( <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a> )
24	24) The approval holder must keep all plans required by these conditions published on the website until the expiry date of this approval.		C	All plans are currently published on the Water Corporation Alkimos project website ( <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a> )
25	25) The approval holder is required to exclude or redact sensitive ecological data from plans published on the website or otherwise provided to a member of the public. If sensitive ecological data is excluded or redacted from a plan, the approval holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.		NR	No plans currently published online contain any sensitive ecological data.
26	26) The approval holder must notify the department electronically of the date of commencement of the Action, within 20 business days following commencement of the Action.		C	The department was notified of the commencement of the action via email on 27 November 2023. Appendix 6: Notification of Commencement of the Action

No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
27		27) The approval holder must not Commence the Action later than 5 years after the date of this approval decision.	C	Action commenced on 20 November 2023. Appendix 6: Notification of Commencement of the Action
27A		27A. The approval holder must notify the department in writing of any proposed change to the conditions of the Western Australian approval that may related to protected matters within 2 business days of formally proposing a change and within 5 business days of becoming aware of any proposed change.	NC	The request to change the Western Australian approval was submitted on 8 October 2024. DCCEEW were notified of the change to the conditions of the Western Australian approval on 18 October 2024. See section 5.2 for further details.
27B		27B. The approval holder must notify the department in writing of any change to the Western Australian approval conditions that may relate to protected matters, within 10 business days of a change to conditions being finalised. This notification must include a copy of the finalised changes to the Western Australian approval conditions.	C	Condition 27B was varied (added) to EPBC 2019/8453 on 1 July 2024. The change to the WA approval conditions was approved on 17 April 2024 prior to the inclusion of condition 27B. No other changes to the Western Australian approval conditions have occurred within the reporting period.
28		28) The approval holder must maintain accurate and complete compliance records.	C	Compliance records are maintained electronically on Water Corporations document control system Nexus. This Annual Compliance Report is evidence of maintaining records and this report will be made publicly available by publishing them on the Water Corporation's website ( <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a> )
29		29) 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. Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the department's website or through the general media.	C	One request for compliance records was received on 19 September 2024 following a site audit by DCCEEW that occurred on 11 September 2024. The requested records were provided on 19 September 2024. Appendix 7: DCCEEW Request for Compliance Records
30		30) The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	C	All monitoring data and plans submitted to DCCEEW have been prepared in accordance with DCCEEW guidelines.
31		31) The approval holder must ensure that any monitoring data (including sensitive ecological data), surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	C	All monitoring data and plans submitted to DCCEEW have been prepared in accordance with DCCEEW guidelines.
32		32) The approval holder must submit all monitoring data (including sensitive ecological data), surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 60 business days or in accordance with the requirements of the Construction Environmental Management Plan and the Construction Marine Environmental Management Plan.	C	Monitoring data provided as per this Annual Compliance Report.
33		33) The approval holder must prepare a compliance report for each 12-month period following the date of this approval decision (or as otherwise agreed to in writing by the Minister).	C	This Annual Compliance Report
34		34) Each compliance report must be consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	C	This Annual Compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.

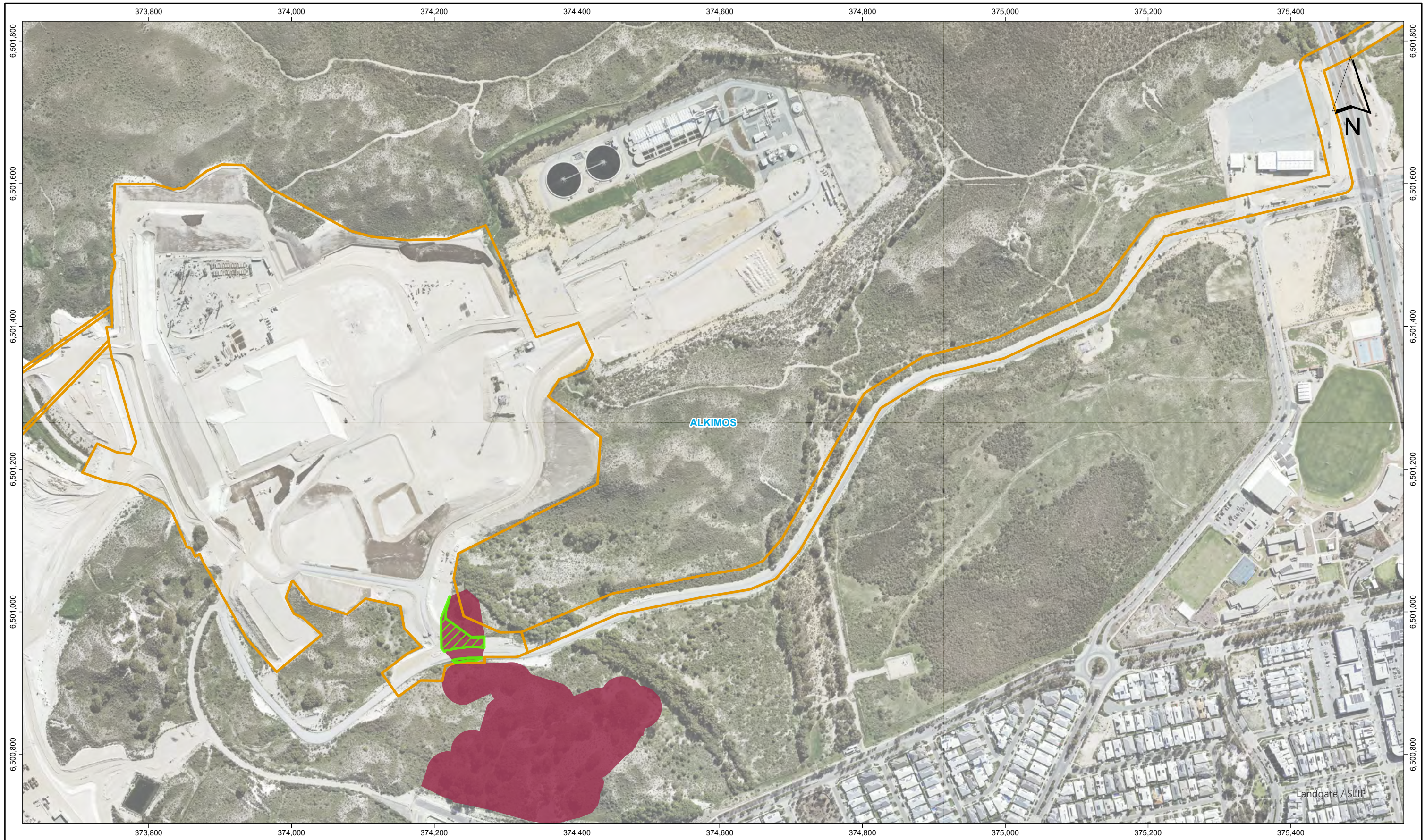
No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
35	35) Each compliance report must include	a) Accurate and complete details of compliance and any non-compliance with the conditions and the plans, and any incidents.	C	This Annual Compliance Report, non-compliances are detailed in Section 5 Non-compliance.
		b) One or more shapefile showing all clearing of protected matters, and/or their habitat, undertaken within the 12-month period at the end of which that compliance report is prepared.	C	Maps of the clearing of protected matters are provided in Figure 1 and Figure 2.  Shapefiles of the clearing of protected matters are provided in Appendix 8 and attached separately in the email submission to DCCEEW.
36	36) The approval holder must:	a) Submit the compliance report to the department within 60 business days following the end of the 12-month calendar year period for which that compliance report is required.	C	This Annual Compliance Report is anticipated to be submitted on 13 March 2025, which is within the 60 business days following the end of the 12-month calendar year period.
		b) Publish each compliance report on the website within 90 business days following the end of the 12-month period for which that compliance report is required.	NR	This is the first Annual Compliance Report and will be published within 90 business days following the end of the 12-month period on the Water Corporation Alkimos project website ( <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a> )
		c) Notify the department electronically, within 20 business days of the date of publication that a compliance report has been published on the website.	NR	This is the first Annual Compliance Report. Water Corporation will notify the department via email of the date this compliance report is published on the Water Corporation Alkimos project website ( <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a> )
		d) Provide the weblink for the compliance report in the notification to the department.	NR	This is the first Annual Compliance Report, following publication on the Water Corporation Alkimos project website ( <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a> ), a weblink will be provided to the department.
		e) Keep all published compliance reports required by these conditions on the website until the expiry date of this approval.	IP	This is the first Annual Compliance Report, published compliance reports will remain on the Water Corporation Alkimos project website ( <a href="https://www.watercorporation.com.au/asdp">https://www.watercorporation.com.au/asdp</a> )
		f) Exclude or redact sensitive ecological data from compliance reports published on the website or otherwise provided to a member of the public.	IP	Any sensitive ecological data will be redacted prior to online publication.
		g) If sensitive ecological data is excluded or redacted from the published version, submit the full compliance report to the department within 20 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website.	IP	Should any sensitive ecological data be redacted, the full compliance report will be submitted to the department.
37	37) The approval holder must notify the department electronically, within 2 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan.	C	Two non-compliances were identified during the reporting period. Notification was made within 2 business days, refer to section 5 Non-compliance.	
38	38) The approval holder must specify in the notification	a) Any condition or commitment made in a plan which has been or may have been breached.	C	

No.	Condition	Sub conditions	Compliance Status	Evidence/ Comment
		b) A short description of the incident and/or potential non-compliance and/or actual non-compliance.	C	Details provided in the notification sent on 1 February 2024 and 28 January 2025, refer to section 5 Non-compliance.
		c) The location (including co-ordinates), date and time of the incident and/or potential non-compliance and/or actual non-compliance. Note: If the exact information cannot be provided, the approval holder must provide the best information available	C	
39	39) The approval holder must provide to the department in writing, within 12 business days of becoming aware of any incident and/or potential non-compliance and/or actual non-compliance, the details of that incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a plan. The approval holder must specify:	a) Any corrective action or investigation which the approval holder has already taken.	C	Details provided in the letter sent on 15 February 2024 and 3 February 2025, refer to section 5 Non-compliance.
		b) The potential impacts of the incident and/or non-compliance.	C	
		c) The method and timing of any corrective action that will be undertaken by the approval holder.	C	
40	40) The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every five-year period following the commencement of the Action until this approval expires (unless otherwise specified in writing by the Minister).			The first independent audit is not required until 2028.
41	41) For each independent audit, the approval holder must:	a) Provide the name and qualifications of the nominated independent auditor, the draft audit criteria, and proposed timeframe for submitting the audit report to the department prior to commencing the independent audit.	NR	
		b) Only commence the independent audit once the nominated independent auditor, audit criteria and timeframe for submitting the audit report have been approved in writing by the department.		
		c) Submit the audit report to the department for approval within the timeframe specified and approved in writing by the department.		
		d) Publish each audit report on the website within 15 business days of the date of the department's approval of the audit report.		
		e) Keep every audit report published on the website until this approval expires.		
42	42) Each audit report must report for the five-year period preceding that audit report.			
43	43) Each audit report must be completed to the satisfaction of the Minister and be consistent with the Environment Protection and Biodiversity Conservation Act 1999 Independent Audit and Audit Report Guidelines, Commonwealth of Australia 2019.			
44	44) The approval holder must notify the department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.		NR	Not required until 60 days prior to expiry on 31 December 2128.
45	45) Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the department electronically of the date of completion of the Action and provide completion data. The approval holder must submit any spatial data that comprises completion data as a shapefile.		NR	The action is not complete.

# 7 Figures

**Figure 1: EPBC 2019/8453 Extent of Tuart TEC Clearing (2024)**

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/188866410>



**LEGEND**

- Development Envelope
- Cleared Tuart (*Eucalyptus gomphocephala*) woodlands and Forests of the Swan Coastal Plain (TEC)
- Tuart (*Eucalyptus gomphocephala*) woodlands and Forests of the Swan Coastal Plain (TEC)



1:5,000 at A3  
 0 100 200  
 Metres

Coordinate System: GDA 1994 MGA Zone 50  
 Vertical Datum: AHD

AUTHOR: POWERA0    DATE: 12/03/2025

BRANCH: ENVIRONMENTAL BUSINESS UNIT

The information contained herein is the exclusive property of the Water Corporation and the respective copyright owners. It is subject to ongoing review and should be viewed in conjunction with the associated materials. No part of this production should be copied, modified, reproduced or published in any form other than that intended by the author.



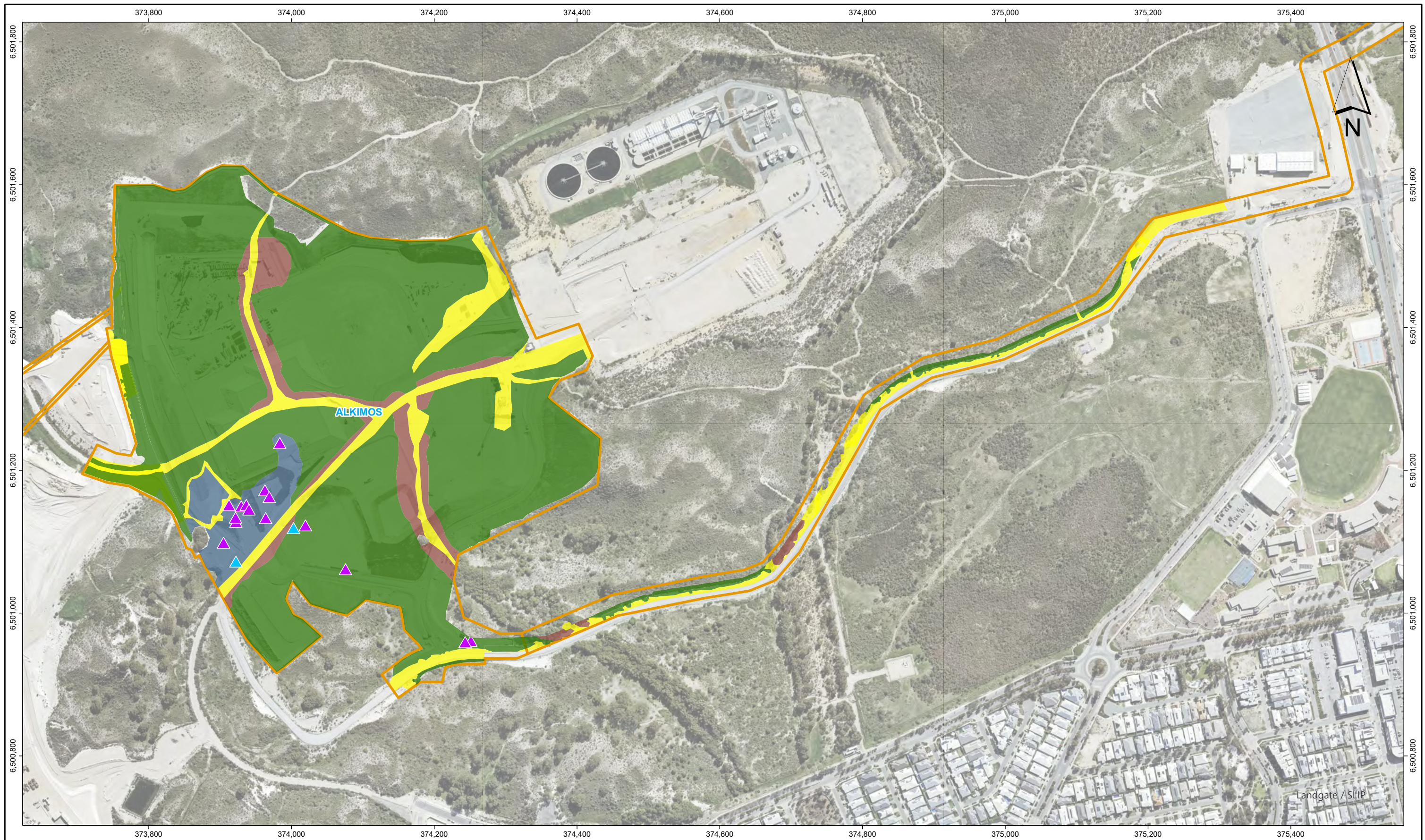
**EPBC 2019/8453 Annual Compliance Report 2024**

*Extent of Tuart TEC Clearing  
 (8 Nov 23 – 7 Nov 2024)*

**Figure 1**

**Figure 2: EPBC 2019/8453 Extent of Black Cockatoo Habitat Clearing (2024)**

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/188857917>

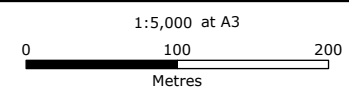


**LEGEND**

- Development Envelope
- Previously cleared vegetation
- Cleared Potential Nesting Tree
- Cleared Suitable Nesting Tree

**Foraging habitat for Carnaby's cockatoo (*Zanda latirostris*) and forest red-tailed black cockatoo (*Calyptorhynchus banksii naso*)**

- Cleared Heath and Shrubland
- Cleared Parkland, Planted Vegetation and Gardens
- Cleared Scattered Trees



Coordinate System: GDA 1994 MGA Zone 50  
Vertical Datum: AHD

AUTHOR: POWERAO      DATE: 12/03/2025

BRANCH: ENVIRONMENTAL BUSINESS UNIT

The information contained herein is the exclusive property of the Water Corporation and the respective copyright owners. It is subject to ongoing review and should be viewed in conjunction with the associated materials. No part of this production should be copied, modified, reproduced or published in any form other than that intended by the author.



**EPBC 2019/8453 Annual Compliance Report 2024**

*Extent of Black Cockatoo Habitat Clearing (8 Nov 23 – 7 Nov 2024)*

**Figure 2**

# 8 Appendices

## Appendix 1: Audit of Alkimos Terrestrial Construction Environment Management Plan

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/188436067>

**Terrestrial Construction Environmental Management Plan - Subcontractor Audit**

Section	Conditions	#	Subconditions	Compliance Status (C, NC, OFI, N/A)	Comment/ Observations
3.1 Leadership and Planning	The Contractor must:		Have an environmental policy that aligns with the Water Corporation's Environmental Policy. Both policies must be displayed at the project site for the duration of the Project	C	Georgiou Environmental Policy contained in Construction Environmental Management Plan (Rev C) and aligns to Water Corporation policy. Both policies displayed in site office and crib hut Photo: Crib Room Displayed Policies.jpg (Nexus: 167139619)
			Document the key roles and responsibilities associated with environmental management of this Project	C	Documented in Construction Environmental Management Plan (Rev C) section 6 structure and responsibilities.
			Undertake work in accordance with this plan to meet the specific environmental objectives and performance indicators.	C	Works undertaken in accordance with the plan
3.2 Risk Management	The Contractor must:		Develop and maintain a process to ensure environmental risks are identified, assessed and managed throughout the Project	C	Documented in Construction Environmental Management Plan (Rev C) section 8 Hazard Identification and Risk Control
			Establish and maintain a risk register for all stages of the Project	C	Risk register sighted reviewed monthly by project team. Have separate CRAW reviews for individual tasks 'Alkimos Desal - Project Risk Register' (Nexus: 167123492)
			Undertake all works in accordance with this CEMP including complying with the controls, monitoring requirements and reporting requirements listed for the key environmental factors	C	Works undertaken in accordance with the plan.
			Prepare any required sub-plans, including the documentation of any credible emergency events, with accompanying contingency actions and reporting requirements for the potential events. These sub-plans will need be approved by an Environmental Advisor from Water Corporation prior to construction.	C	Documented in Construction Environmental Management Plan (Rev C) section 12. Incident, Emergency Preparedness and Response
3.3.2 Other Requirements	The Contractor must:		Document a process for ensuring that any communicated changes to compliance obligations are assessed and identify any changes to sub-plan documentation, controls or management practices	C	Documented in Construction Environmental Management Plan (Rev C) section 5. Legal and Other Obligations
			Retain records demonstrating compliance with all management actions and reporting requirements within the CEMP and sub-plans. Records at to be made available to Water Corporation upon request.	C	HSE advisor, engineers and supervisor undertake enviro inspections. Sustainability report provides monitoring data for (weekly) bore extraction volumes, fuel usage and waste volumes. One dust monitor on site (near Eastern haul road) and provides a weekly report for dust exceedances. Evidence: Sustainability Monthly-reporting-form-Dec 041223.xlsx (Nexus: 166984724), Environmental Inspection 15Dec23.pdf (Nexus: 167398975 ), Environmental Inspection 15Jan23.pdf (Nexus: 167398438), Dust monitor report.pdf (Nexus: 167395117)
			Report and investigate any instances of a compliance obligation (from CEMP or Sub-plans) not being met (refer Section 3.8).	C	No non-compliance reported to date.
3.4 People Management	The Contractor must:		Identify any roles/activities within the scope that require specific environmental training and document the training requirements	C	Specific training for fauna handling. Fauna handlers are identified in crib rooms. Photo: Crib Room Snake Handler Contact Poster.jpg (Nexus: 167138644). Training record for Fauna Handler Certificate Shannon Kelly.pdf (Nexus: 167124855)
			Identify a method for ensuring that workers meet training requirements and records of training are retained	C	All workers undertake site specific induction that contains environmental risks for the project. Records are kept on Beacon. Training records checked, most recent inductee 29/1/24. Site Induction Checklist.docx (Nexus: 167124588), ASDP Induction Presentation.pptx (Nexus: 167397977)
			Develop and implement induction material specific to the scope of works and the requirements of this CEMP. The material must include: - Information related to key environmental factors (as listed in Section 2.3 and detailed in Section 4) and any additional environmental factors identified in the CEMP. - Specific requirements for activities with potential high environmental risks - Incident management - General awareness of other environmental issues associated with the activities	C	Induction viewed cover factors: dust, flora and fauna, cultural heritage, soil and material management, fire, weeds and pests, noise and vibration recent inductee 29/1/24. Site Induction Checklist.docx (Nexus: 167124588), ASDP Induction Presentation.pptx (Nexus: 167397977)
			Ensure all workers complete the site induction. Short-term visitors such as couriers and delivery agents may receive a shortened or no induction, but should be escorted (or have a designated and marked safe area/zone)	C	Training records observed on Beacon. Worker picked at random (Mason Kreuzsch) and training has been completed and signed off.
			Provide a copy of induction material to Water Corporation for their comment prior to construction.	C	Water Corporation reviewed induction during CEMP review (5 Oct 2023)
3.5 Stakeholders, Communication, and Consultation	The Contractor must:		Document methods for communicating environmental information to workers and other internal stakeholders	C	Documented in Construction Environmental Management Plan (Rev C) section 7. Communication and Consultation. Toolbox talks
			Document a process that details how external stakeholders raise concerns/queries on Project activities, and the method for recording and responding to these queries/concerns		Documented in Construction Environmental Management Plan (Rev C) section 7. Communication and Consultation
			Document any regulatory agencies, landowners, and other rights holders who are required to be consulted during the Project and state when and how communication with them will occur.		Documented in Construction Environmental Management Plan (Rev C) section 7.2. Community Communication and Consultation
3.6 Systems of Work	The Contractor must:		Comply with all controls, and monitoring and reporting requirements of this CEMP	C	Works undertaken in accordance with the plan
			Comply with all controls, and monitoring and reporting requirements of approved Sub-plans (as listed in section 3.3.2)	C	Works undertaken in accordance with the plan
			Retain records to demonstrate compliance with system of works procedures and monitoring requirements	C	Records are kept in accordance with the plan

3.7 Land, Facilities, Plant and Equipment	The Contractor must:	Identify any plant and equipment that is critical to meeting Health Safety and Environment & Aboriginal Affairs (HSEAA) requirements. This includes: - Plant and equipment that will be used to meet the requirements; or - Plant and equipment that, when used, may affect meeting HSEAA requirements	C	Engineers manage plant register Vehicles/ plant have daily prestarts and servicing stickers. Evidence: Plant Compliance Checklist Register.csv (Nexus: 167130809) Plant Compliance DT04.pdf (Nexus: 167152172)
		Identify any compliance obligations, industry standards, performance criteria, or other parameters that this plant and equipment must meet		Engineers manage plant register Vehicles/ plant have daily prestarts and servicing stickers. Evidence: Plant Compliance Checklist Register.csv (Nexus: 167130809) Plant Compliance DT04.pdf (Nexus: 167152172)
		Document how this plant and equipment will be inspected, monitored, and maintained to ensure performance criteria are being met	C	Documented in Construction Environmental Management Plan (Rev C)
		Develop a site plan, provide it to Water Corporation and maintain a copy of the site plan in the site office, include it within the CEMP addendum and also have it included in induction material. At a minimum the plan must include: - the extent of the approved DE and DF - cadastral boundaries - site offices, facilities and amenities - laydown areas - material stockpiles, soil/spoil windrows - location of stormwater runoff control measures - ASS treatment locations - infiltration areas - hygiene management points - access points to areas of the project.	C	Documented in Construction Environmental Management Plan (Rev C) Appendix 17 Site Plan displayed in crib room See photo: Crib Room Site Environment Plan.jpg (Nexus: 167140344)
3.8 Incident Management, Reporting and Investigation	The Contractor must:	Document the process for responding to, investigating and reporting environmental incidents. This process must include the key roles, equipment and resources required	C	Documented in Construction Environmental Management Plan (Rev C) section 13. HSE Reporting and Investigation
		Maintain a register of all fauna removals, deaths or injuries	C	Fauna register sighted. Contains one record for a snake that was sighted. Fauna handler attended site but snake not found. Evidence: Fauna Register.PNG (Nexus: 167131618)
		Report all actual or potential environmental incidents to Water Corporation within the following time periods: - For incidents involving wastewater: as soon as possible, not exceeding 30 minutes - For all other incidents: as soon as practical not exceeding 24 hours	N/A	No environmental incidents to date
3.9 Performance Monitoring, Audit and Improvement	The Contractor must:	Document how performance will be monitored against environmental objectives, performance criteria, and requirements – including development of a site environmental inspection checklist.	C	Documented in Construction Environmental Management Plan (Rev C) Environmental Subplans
		Participate in inspections or audits conducted by Water Corporation or regulators. The minimum frequency of inspections and audits are outlined in Table 3.	C	Enviro inspection sighted for 23/01/2024. No regulator inspections to date. WC staff attend inspections (Jaco S, Greg R, Sean N). Evidence: Environmental Inspection 15Dec23.pdf (Nexus: 167398975 ), Environmental Inspection 15Jan23.pdf (Nexus: 167398438)
		Document a process that: - Determines the cause of incidents and non-conformances / non-compliances - Identifies and implements corrective actions - Identifies actions required to prevent recurrence - Records changes in written procedures resulting from the corrective action.	C	Documented in Construction Environmental Management Plan (Rev C) section 13. HSE Reporting and Investigation
4 Environmental Management	For each factor, the contractor must:	Adhere to all identified requirements within this CEMP along with any other requirements deemed necessary to meet the environmental objectives	C	Observed during audit
		Identify any credible emergency events and document within the CEMP addendum the emergency response plan, any contingency actions and the reporting requirements to be implemented for such events.	OFI	Documented in Construction Environmental Management Plan (Rev C) section 12. Incident, Emergency Preparedness and Response. Emergency drill undertaken for vehicle rollover on 19/01/24 - record sighted. No specific environmental drills undertaken to date. <b>OFI</b> - Undertake bushfire emergency response drill (or other environmental emergency drill)
<b>4.1 Flora and Vegetation</b>				
4.1.2 Objective	Prevent impacts to native vegetation outside of the approved clearing area	No clearing or damage to vegetation outside of the Approved Clearing Area.	NC	During the site inspection sand encroachment beyond the project boundary was observed in 6 locations. Locations were not in active work areas and the encroachment appears to have been caused by wind blowing sand beyond boundary. <b>Action:</b> Raise incident report and undertake incident investigation to determine root cause(s) of the breach.
	Minimise impacts to native flora and vegetation within the approved clearing area	Identify opportunities to reduce clearing area (ha)	C	Design reviews of earthworks footprint and DN355 pipeline have resulted in an overall reduced clearing footprint.
		100% compliance with controls listed in Section 4.1.3 and specific controls listed in the CEMP	NC	Compliance control 4.1.3.9 not complied with, see item 4.1.3.9 for action.
	Prevent indirect impacts to surrounding sensitive receptors (National Parks, State Forests, TECs, PECs, ESAs, Wetlands and Bush Forever sites)	Identify opportunities to reduce clearing area (ha)	C	Design reviews of earthworks footprint and DN355 pipeline have resulted in an overall reduced clearing footprint
		All impacts to significant vegetation are contained to within the SDP and pipeline DEs, and managed as per the specified control actions (refer 4.1.3 and 4.4.3)	N/A	All impacts to significant vegetation as per the DE.
	Prevent impacts to vegetation resulting from groundwater drawdown	No decline in vegetation health resulting from groundwater drawdown	N/A	No dewatering occurred to date
		No exceedance of groundwater drawdown limits	N/A	No dewatering occurred to date
100% compliance with an approved Dewatering Management Plan		N/A	No dewatering occurred to date	

	Prevent impacts to habitat trees		100% of Black Cockatoo habitat trees identified for retention to remain at the conclusion of works.	C	Habitat trees are flagged off. No actual habitat trees have been removed. Trees checked by Black Cockatoo specialist on 16/11/2023, no habitat trees identified within clearing area (Nexus: 163836161)
4.1.3 Controls	Table 5: Flora and vegetation minimum actions	4.1.3.1	Prior to clearing all relevant permit and approvals shall be reviewed and any clearing requirements identified and communicated to Contractors.	C	Site walkthrough completed for pre-clearing walkthrough. Requirements are communicated through Safe Work Method Statements (SWMS) and prestart. Evidence: Safe Work Method Statement - Clearing & Grubbing - Georgiou ASDP.pdf (Nexus: 167403878), Prestart meeting pre clearing.pdf (Nexus: 167398813)
		4.1.3.2	Clearing area limit must be delineated by the use of pegs, fencing and/or continuous flagging tape by a qualified engineering surveyor. Ensure that the clearing area limit delineated is the approved clearing area limit.	C	Clearing area is delineated by continuous orange flagging. See photo: Project boundary delineation Conservation No Entry signage (Nexus: 167138645)
		4.1.3.3	In areas adjacent to TEC/PECS, ESAs or Conservation areas hazard tape/flagging is to be used as a buffer at least 1 m inside the clearing area limit to avoid unauthorised clearing of material spoil outside of the approved area. The digital shapefiles are to be supplied to the Contractors by the Water Corporation to allow a qualified engineering surveyor to undertake this task.	C	Confirmed in survey setout file, flagging adjacent to conservation areas was set in 1m from the clearing boundary.
		4.1.3.4	Inspect and identify native vegetation and habitat trees (DBH >500mm) that can be retained or protected, thereby reducing overall clearing required. Clearly identify and flag these areas prior to clearing	C	Retained Tuarts are marked on site with continuous flagging around drip line of tree. Photo: Retained Tuart Tree with flagging.jpg (Nexus: 167126353)
		4.1.3.5	The Contractor is to arrange a final inspection of the demarcation of approved clearing area within TECs/PECs, ESAs, Bush Forever sites by Water Corporation's Environmental Scientist. This is to occur at least five working days prior to clearing.	C	Final inspection of demarcation occurred on 16/11/23 by Sean Nicholson, clearing took place on 20/11/23.
		4.1.3.6	The Water Corporation is to provide approval of demarcated boundaries of approved clearing within TECs/PECs, ESAs, Bush Forever sites prior to clearing commencing	C	Provided by Sean Nicholson via email on 17/11/23.
		4.1.3.7	Photographic records and video recording (as appropriate) of land and vegetation conditions and features on or around the site, such as trees and shrubs, will be stored as a record that the approved clearing area limit was not breached.	N/A	To be provided once all project clearing complete.
		4.1.3.8	Construction staff to be educated during an initial induction that includes issues relating to clearing activities to ensure the requirements of this CEMP are understood by all parties involved.		Induction viewed cover factors: dust, flora and fauna, cultural heritage, soil and material management, fire, weeds and pests, noise and vibration recent inductee 29/1/24. Site Induction Checklist.docx (Nexus: 167124588), ASDP Induction Presentation.pptx (Nexus: 167397977)
		4.1.3.9	Maintain the integrity of barriers used to demarcate the approved clearing area, tree protection zones, and any areas of native vegetation to be retained. Barriers are to be inspected on a daily basis to confirm their integrity and any repairs undertaken prior to commencing ground disturbance.	NC	During the site inspection, encroachment beyond the project boundary was observed in 6 locations. Locations were not in active work areas and the encroachment appears to have been caused by wind blowing sand beyond boundary. Barrier inspections have been undertaken for active work areas but not inactive areas, the breach was not noticed until the audit. <b>Action:</b> Ensure daily inspections of barriers are undertaken and documented for all clearing areas, tree protection zones and any areas of native vegetation to be retained
		4.1.3.10	Clearing shall be conducted in a slow, progressive manner from one direction to the other (e.g. west to east) to allow fauna to move into adjacent native vegetation ahead of the clearing activity.	C	Clearing undertaken West to East with fauna handler (Animal Ark) on site for all ASDP footprint clearing to relocate any fauna.
		4.1.3.11	Required work areas and access tracks shall be identified prior to commencement of construction. Access tracks must not require clearing of native vegetation outside the approved clearing area.	C	Documented in Construction Environmental Management Plan (Rev C) Appendix 17 Site Plan displayed in crib room See photo: Crib Room Site Environment Plan.jpg (Nexus: 167140344). Map of work areas and access tracks is displayed in office area compound where prestarts are done daily. Map updated on an ongoing basis as site works change. See photo Site Map showing access roads.jpg (Nexus: 167130809)
		4.1.3.12	Vegetation earmarked for removal within the approved clearing area should be felled so that if falls within the DE, to avoid damage to surrounding vegetation intended for retention.	C	All vegetation was felled within the project boundary.
		4.1.3.13	No dead, standing or fallen timber shall be removed unnecessarily; all logs resulting from land clearing shall be stockpiled in a previously cleared area and used to enhance fauna habitat or to restrict public access to certain areas, on advice of Water Corporation	C	Vegetation is mostly shrubland and was mulched and stockpiled for later reuse.
		4.1.3.14	Topsoil within areas of significant native vegetation (National Park, State Forest, TEC, PEC, ESA, Bush Forever sites and MRS conservation area 10b) (Attachment C) to be stripped to a depth of 100-150 mm and stockpiled separately.	C	Topsoil stripped and stockpiled as per the Weed and Topsoil Management Plan (Nexus: 163725348)
		4.1.3.15	All topsoil from areas identified as weed infested and/or dieback infested shall be stripped separately and deposited in the nominated spoil sites for offsite removal.		Topsoil stripped and stockpiled as per the Weed and Topsoil Management Plan (Nexus: 163725348)
		4.1.3.16	Topsoil must not be stockpiled at heights greater than 1.5 m.	C	Topsoil to be reused stockpiled to 1.5m, weed infected topsoil for burial permitted to be stockpiled >1.5m.
		4.1.3.17	Vegetation clearing logs are maintained and made available at the request of the Water Corporation	N/A	To be provided once all project clearing complete.
		4.1.3.18	Adhere to information and instructions within a Dewatering Management Plan (DMP) during all applicable operations	N/A	Dewatering not part of Georgiou's scope.
		4.1.3.19	Appropriate handling of all pinewood within the DE; including correct movement, removal, destruction and treatment of pinewood (as per the Agriculture and Related Resources Protection (European House Borer) Regulations 2006	N/A	No pinewood within Georgiou approved clearing area.
		4.1.3.20	Within 2 weeks following the completion of clearing activities, the total cleared area must be determined by an engineering surveyor, mapped and reported to the Water Corporation (including start and end dates of clearing activities).	N/A	Clearing not yet completed.

		4.1.3.21	Removal of all flagging tape post construction.	N/A	Project still in construction
		4.1.3.22	Within 3 months of completion of works, ensure that any areas that are not required for continued maintenance to be backfilled and restored with top soil to pre-existing contours to promote the natural regeneration of native vegetation.	N/A	Project still in construction
4.1.4 Monitoring and Reporting	Table 6: Minimum flora and vegetation monitoring requirements	4.1.4.1	Inspect all demarcated boundaries for damage or signs of encroachment.	NC	See item 4.1.3.9
		4.1.4.2	Survey the actual extent of clearing undertaken. Include start and end clearing dates. Provide clearing log to Water Corporation	N/A	Clearing ongoing, records to be provided once all clearing complete.
	Table 7: Minimum flora and vegetation reporting requirements	4.1.4.3	Contractor to provide Water Corporation with georeferenced spatial data indicating the actual extent of clearing undertaken.	N/A	Clearing ongoing, records to be provided once all clearing complete.
		4.1.4.4	Contractor to take photographic evidence of proposed clearing area before and after clearing	N/A	To be provided once all project clearing complete.
<b>4.2 Weeds, Pests and Disease Hygiene</b>					
4.2.2 Objectives	To prevent the introduction or spread of significant weeds or diseases as a result of construction works		No introduction or spread of significant weed species as a result of project activities	C	No significant spread of weeds.
			No introduction or spread of dieback associated with construction works	C	No dieback introduced.
			Full compliance with the Agriculture and Related Resources Protection (European House Borer) Regulations 2006 regarding pinewood management.	N/A	No pinewood within Georgiou approved clearing area.
4.2.3 Controls	Table 9: Weeds pests and disease hygiene management minimum actions	4.2.3.1	Prepare a CEMP addendum identifying site-specific weed, pest and disease hygiene risks and provide further detail on controls to be implemented	C	Documented in Construction Environmental Management Plan (Rev C) Appendix 10 – Weed, Pest and Disease Management Sub Plan
		4.2.3.2	Undertake pre-construction targeted weed mapping, within the proposed clearing area, and 15m in to adjacent Conservation areas, and a Phytophthora survey to inform weed and dieback management	C	Conducted by Water Corporation on 17-Oct-23 by Tranen. Nexus: 163725348
		4.2.3.3	Undertake pre-construction Phytophthora cinnamomi survey of the proposed clearing area, and 25m in to adjacent Conservation areas, to inform dieback management	C	Conducted by Water Corporation on 17-Oct-23 by Tranen. Nexus: 163725348
		4.2.3.4	Weed control to be undertaken if Declared Pests or Weeds of National Significance are present in the area proposed to be disturbed	C	Conducted by Water Corporation on 17-Oct-23 by Tranen. Nexus: 163725348
		4.2.3.5	Adhere to the Department of Parks and Wildlife (2015) corporate policy for the management of Phytophthora and the Management Guidelines (Department of Conservation and Land Management (2015) Plan	C	Conducted by Water Corporation on 17-Oct-23 by Tranen. Nexus: 163725348
		4.2.3.6	Develop a Dieback Management Plan (as an addendum to this CEMP), in consultation with DBCA and Water Corporation.	C	Conducted by Water Corporation on 17-Oct-23 by Tranen. Nexus: 163725348
		4.2.3.7	Implement approved Dieback Management Plan	C	Plant compliance checklist contains section on equipment being clean before entry and photos. Sighted inspected records for Moxy dump truck (DT-04).
		4.2.3.8	All site personnel and construction staff will be educated during an initial induction that includes issues relating to hygiene control to ensure the project's approved Dieback Management Plan is understood by all parties involved	C	Project induction contains section on weed hygiene and dieback management. Evidence: Site Induction Checklist.docx (Nexus: 167124588), ASDP Induction Presentation.pptx (Nexus: 167397977)
		4.2.3.9	Clearly demarcate any hygiene management areas (with clear signage to differentiate infested and uninfested areas) and establish clean on entry and exit points with, as a minimum, brush down facility and a log of vehicles entering and exiting the area.	N/A	No hygiene control areas as project area is deemed uninterpretable, vehicles required to be clean on entry.
		4.2.3.10	Inspect all plant and equipment to ensure it is free from soil and plant debris prior to commencement of work on site.	C	Plant compliance checklist contains section on equipment being clean before entry and photos. Sighted inspected records for Moxy dump truck (DT-04). Evidence: Plant Compliance DT04.pdf (Nexus: 167152172)
		4.2.3.11	Soil or mulch material not certified as weed-free or dieback-free must not be imported into the site, and all material must have WC approval	N/A	No soil or mulch imported to site.
		4.2.3.12	Appropriate handling of all pinewood within the DEs; including correct movement, removal, destruction and treatment of pinewood (as per the Agriculture and Related Resources Protection (European House Borer) Regulations 2006)	N/A	No pinewood within Georgiou approved clearing area.
		4.2.3.13	After backfilling within National Park, State Forest, TEC, PEC, ESA and Bush Forever sites, the spreading of topsoil shall occur. Herbicide shall be strategically applied if weeds germinate (selected herbicide is to be approved by WC prior to use) (see Section 4.14)	N/A	Backfilling not yet commenced.
		4.2.3.14	An on-going inspection and control program shall be implemented for Declared Pests and significant weeds within the DE	C	All significant weeds removed by Tranen during Weed survey on 17/10/23 by Tranen. Nexus: 163725348
		4.2.3.15	The use of any pesticides or herbicides must comply with the Department of Health's Circular No. PSC 88 Use of herbicides in water catchment areas	N/A	No pesticide use to date
4.2.4 Monitoring and Reporting	Table 10: Minimum weeds pests and disease hygiene management monitoring requirements	4.2.4.1	The Contractor must undertake regular monitoring of adherence to the Hygiene Management Controls within the CEMP as a part of routine environmental inspections	C	Inspection covers plant clean on entry requirement and separation of topsoil stockpiles. Evidence: Environmental Inspection 15Dec23.pdf (Nexus: 167398975 ), Environmental Inspection 15Jan23.pdf (Nexus: 167398438)
		4.2.4.2	Log of vehicle hygiene for all vehicles, plant & equipment entering the site	C	Records are kept in Beacon of all plant and equipment clean on entry. Evidence: Plant Compliance Checklist Register.csv (Nexus: 167130809).
		4.2.4.3	The Contractor must undertake regular monitoring of compliance with pinewood management guidelines	N/A	No pinewood within Georgiou approved clearing area.
	Table 11: Minimum weeds pests and disease	4.2.4.4	Report inspection logs of vehicles/plants/machinery arriving on site and entering/exiting any dieback hygiene management points (clean on entry/exit)	C	Records are kept in Beacon of all plant and equipment clean on entry. Evidence: Plant Compliance Checklist Register.csv (Nexus: 167130809).

	Table 11: Minimum weeds pests and disease hygiene management reporting requirements	4.2.4.5	Confirmation of weed control in the form of records, photographs and other brief documentation, such as herbicide usage.	C	Records are kept in Beacon of all plant and equipment clean on entry Evidence: Plant Compliance Checklist Register.csv (Nexus: 167130809).
		4.2.4.6	Report the results and outcomes of the monitoring of pinewood management	N/A	No pinewood within Georgiou approved clearing area.
<b>4.3 Terrestrial Fauna</b>					
4.3.2 Objectives	Prevent impacts to native fauna resulting from project activities.		No injury or death to fauna as a result of project activities.	C	No fauna injuries to date.
			No native fauna are trapped in excavated trenches.	N/A	No open trenching works undertaken to date.
			All construction work and associated impacts must remain within the construction footprint. This includes access to and from the construction work site.	C	No impacts to fauna outside of project footprint
			No unauthorised vegetation clearing or vegetation disturbance beyond the approved clearing area limit	NC	See item 4.1.2
	Ensure impacts on protected fauna (in particular black cockatoo habitat) are adequately minimised during construction.		No injury or harm to workers attributable to fauna interactions.	N/A	No injuries reported to date
			No clearing of black cockatoo habitat trees outside the approved clearing area.	C	No clearing of black cockatoo habitat trees occurred to date.
			No damage to key protected fauna habitat outside the approved clearing areas during construction.	C	No clearing of protected fauna habitat outside of approved clearing area date.
			No injury to or death of threatened fauna.	C	No fauna injuries or deaths reported to date.
	No disturbance of breeding black cockatoos.	C	No breeding black cockatoo trees within clearing area		
	No unapproved disturbance of black cockatoo habitat.	C	No clearing of black cockatoo habitat trees occurred to date.		
4.3.3 Controls	Table 13: Terrestrial fauna minimum actions	4.3.3.1	Minimise vegetation clearing and the area of disturbance on the ground by utilising existing cleared areas where possible.	C	Contractor laydown is within pre-existing cleared area. Topsoil storage area is with pre-cleared area.
		4.3.3.2	Identify a person qualified under the Wildlife Conservation Act to undertake fauna handling (including relocation or removal) for the life of the project.	C	Animal Ark are engaged for fauna handling and were present during initial clearing. Fauna handler poster of trained fauna handlers displayed in site office Crib Room Snake Handler Contact Poster.jpg (Nexus: 167138644). Training record for Fauna Handler Certificate Shannon Kelly.pdf (Nexus: 167124855)
		4.3.3.3	All staff and Contractors involved in clearing activities will be inducted on the potential impacts to fauna (including vehicle strikes on black cockatoo species) and advised to stop works in the vicinity of any injured or shocked animals that are encountered.	C	Site specific induction contains requirements on impacts to fauna. Evidence: Site Induction Checklist.docx (Nexus: 167124588), ASDP Induction Presentation.pptx (Nexus: 167397977)
		4.3.3.4	Prior to each day's clearing, the Contractor is to check underneath all logs, rocks, in trees and any other habitat that may be used by fauna, within the area that is about to be cleared, to allow the removal and relocation of any discovered fauna. Any person removing and relocating native fauna must hold a licence to take specially protected fauna in accordance with the Biodiversity Conservation Act 2016.	C	Qualified fauna handlers from Animal Ark were present during initial clearing to check and relocate any trapped fauna.
		4.3.3.5	Retention, of potential black cockatoo habitat trees (particularly hollow-bearing trees), where the design and construction methodology allow. A pre-clearance survey will be undertaken to flag the potential black cockatoo trees within the project footprint (using distinctive flagging for those with hollows) to allow Contractors to see which trees shall be avoided, where the design and construction methodology allow.	C	Habitat trees are flagged off. No actual habitat trees have been removed. Trees checked by Black Cockatoo expert on 16/11/2023, no habitat trees identified within clearing done (Nexus: 163836161)
		4.3.3.6	The project schedule will plan, for clearing to take place outside the typical breeding season for black cockatoos (i.e. when breeding birds and their young are not using hollows) (peak breeding season is August– January). Where the project schedule requires clearing during the typical breeding season, requirement 4.3.3.7 (below) must be implemented.	N/A	No habitat trees within project area.
		4.3.3.7	If clearing is unavoidable during the typical breeding season of black cockatoos, a preclearing inspection of trees containing hollows to be cleared will be undertaken, by a black cockatoo specialist, to ensure there are no breeding activities present in the trees. If breeding activities are identified, clearing is to be avoided until such time nestlings have left the nest without human intervention. The contractor is to provide an accurate schedule of works at least 4 weeks in advance to the Water Corporation so that a specialist can be engaged to undertake the inspection.	N/A	No habitat trees within project area.
		4.3.3.8	Clearing is to be undertaken in a directional manner that will ensure that native fauna can move into uncleared/larger areas of intact native vegetation and away from areas of hazard such as major roads, car parks, etc.	C	Clearing was undertaken in East to West direction as observed by S Nicholson during clearing on 20/11/2023
		4.3.3.9	Traffic is to be controlled to prevent fauna collisions, such as the installation of Wildlife Warning Signs to warn drivers that wildlife may stray onto roads. This also includes the use of speed limits throughout the site to minimise risk of fauna strike (in particular when black cockatoos are present on site).	OFI	Site has a traffic control plan and speed limits on site. No wildlife warning signs on access road into site where kangaroos are observed frequently. <b>Action:</b> Install wildlife/ kangaroo warning signs on plant access road
		4.3.3.10	Construct barriers at the ends of installed or stored pipes at the end of each working day to prevent access by fauna.	N/A	No stored pipes on site at time of audit
		4.3.3.11	Fauna ladders or ramps must be installed where necessary within open excavations to allow fauna to exit.	N/A	No open trenching works undertaken to date.
		4.3.3.12	Daily inspections of all open trenches and pipes must be undertaken prior to commencing work each day to ensure that there are no trapped fauna. Daily inspections will also monitor presence of seasonal / migratory bird species (e.g., black cockatoo). This information will feed into daily toolbox meetings to reiterate the importance of fauna management measures.	N/A	No open trenching works undertaken to date.
		4.3.3.13	In the event of injury to any fauna, a suitable qualified person (e.g. veterinarian, DBCA ranger, trained snake catcher) must be contacted to provide appropriate treatment, including euthanasia, as necessary. If injured wildlife is found, call Wildcare Helpline on (08) 9474 9055 for advice on the nearest registered wildlife rehabilitator. Wildcare Helpline phone number is to be displayed in the site office.	C	No injured wildlife reported to date. One snake observed (fauna register) handler attended site but snake could not be found. Evidence: Fauna Register.PNG (Nexus: 167131618)
		4.3.3.14	Injured fauna will not be harmed or killed unless a decision to euthanise by approved methods by a suitably qualified person is made (e.g. a veterinarian). Relevant contact numbers for the authorised persons is to be documented within the approved CEMP.	N/A	No injured fauna reported to date.
		4.3.3.15	Any fauna found within the construction footprint area will be removed by an approved fauna handler and relocated to a minimum of 50 m outside of the project area, but within vegetated areas. The fauna removed will be recorded in a fauna removal log that shall be retained at the site office.	N/A	No fauna relocations occurred to date
		4.3.3.16	Dead fauna will be removed to prevent attracting other fauna to source food and the dead fauna will be disposed of as putrescible waste (to landfill). The details of the dead fauna will be recorded in a Fauna Removal Log that shall be retained at the site office.	N/A	No dead reported/ found to date

		4.3.3.17	Dogs, cats and other domesticated animals and firearms will not be allowed within the project site, other than those having business at the site.	C	No prohibited items reported being brought to site, induction covers prohibited items.
		4.3.3.18	Contractors to be instructed not to feed fauna.	C	Site specific induction includes staying away from fauna
4.3.4 Monitoring and Reporting	Table 14: Minimum terrestrial fauna monitoring requirements	4.3.4.1	The Contractor must inspect all open excavations for the presence of fauna	N/A	No open trenching works undertaken to date.
		4.3.4.2	The Contractor must maintain a register of all fauna removals, deaths or injuries. The register must identify: - Date, time and location - Type and number of fauna - Status (e.g. dead/alive/injured) - Method of removal - Location of removal - Details of person (name, contact registration/licence details)	C	No injured wildlife reported to date. One snake observed (fauna register) handler attended site but snake could not be found. Evidence: Fauna Register.PNG (Nexus: 167131618)
	Table 15: Minimum terrestrial fauna reporting requirements	4.3.4.3	The Contractor must report the fauna register to the Water Corporation	C	Fauna register requested as part of this audit.
<b>4.4 Conservation Areas</b>					
4.4.2 Objectives	Protect and maintain ecological value and function of conservation areas		- Minimised clearing as much as practicable - No spread of weed into conservation areas (4.2) - No spread of dieback into conservation areas (4.2) - Maintained connectivity within conservation areas to provide native fauna corridors (4.14) - Maintained firebreak access (4.7) - Maintained fencing and prevention of access by trespassers	C	
4.4.3 Controls	Table 17: Conservation Area management minimum actions	4.4.3.1	Prior to any vegetation clearance and ground disturbance, DBCA, DPLH, Forest Products Commission (FCP) and Bush Forever are to be consulted to achieve landowner permission to undertake the work	N/A	Not within any listed agencies land, all Water Corporation land
		4.4.3.2	Ensure applications to carry out disturbance on DBCA managed lands have been approved through the Disturbance Approval Strategy (DAS).	N/A	No works within DBCA lands
		4.4.3.3	Vehicle movement to be minimised, and to remain on designated tracks.	C	Prestart board contains diagram of project access tracks and zones. Evidence: Prestart Board - Site Map and Fire Rating.jpg (Nexus: 167168735)
		4.4.3.4	Clearing area boundaries adjacent to Conservation areas are to have temporary hard fencing installed to demarcate the DE and to restrict access.	C	Permanent ring lock fencing has been installed around all conservation areas. Evidence: North boundary fence 1 metre buffer and flagging.jpg (Nexus: 167152118)
		4.4.3.5	Clearing area boundaries adjacent to Conservation areas are to have an additional demarcation layer using hazard tape/flagging as a buffer at least 1 m inside the approved clearing area limit to avoid unauthorised clearing. The digital shapefiles are to be supplied to the Contractors by the Water Corporation to allow a qualified engineering surveyor to undertake this task.	C	Orange flagging used on external perimeter of clearing area. Permanent ring lock fencing has been installed on the inside around all conservation areas. Evidence: North boundary fence 1 metre buffer and flagging.jpg (Nexus: 167152118)
		4.4.3.6	Siltation fences or other suitable erosion control mechanisms to be installed at locations where adjacent Conservation areas are at risk of erosion impact from the construction works.	NC	No siltation fence installed along project boundaries. Evident from site inspection that wind erosion is causing sand to breach the clearing boundary. <b>Action:</b> Georgiou to install silt fencing along project boundary where sand from wind erosion is likely to breach project boundary.
		4.4.3.7	Targeted manual removal of eroded material from Conservation areas is to be undertaken in the event of inadvertent erosion events.	C	One event where soil material had encroached beyond the clearing boundary and was subsequently removed. Sentinel Reference: INS-238273
		4.4.3.8	"No Entry – Conservation Area" signage with wording to appropriate standard is to be placed at 500m spacing along all temporary fences/original fence lines indicating contact details and restriction to access of these areas.	C	Signage is installed on Northern boundary along conservation area. Evidence: Conservation area demarcation flagging and signage.jpg (Nexus:167152118)
		4.4.3.9	Where DBCA tracks/trails intercept the pipeline corridor appropriate traffic management/signage is to be installed to advise the public of the construction works.	N/A	Not within DBCA managed lands
		4.4.3.10	DBCA is to be contacted prior to construction in areas where a DBCA managed track/trail is to be impacted, to determine if temporary alternative access will need to be provided to potential users via DBCA's website and other local websites/advertising avenues. The contractor shall provide Water Corporation a schedule for works in these areas at least 4 weeks prior to proposed commencement.	N/A	Not within DBCA managed lands
4.4.4 Monitoring and Reporting	Table 18: Minimum Conservation Area management monitoring requirements	4.4.4.1	Monitoring requirements: - Inspect fencing and signage. - Repair and replace fencing and signage as recommended from the inspection.	C	Included in weekly enviro inspection
	Table 19: Minimum Conservation Area management reporting requirements	4.4.4.2	Maintain evidence of all consultation with DBCA, DPLH, Forest Products Commission (FCP) and Bush Forever	N/A	No works within listed agency land
		4.4.4.3	Maintain a register of any public complaints and provide the register to Water Corporation	C	Community complaints register viewed, non received to date. Evidence: Community Complaints Register.PNG (Nexus: 167509217)
<b>4.5 Dust</b>					
4.5.2 Objectives	Ensure that activities do not unreasonably affect the amenity of surrounding landowners		No visible dust plumes extending greater than 10 m from the boundary of the DEs	OFI	Some dust visible however project has 5 watercarts, hydromulch and dustex to try to minimise/control dust from works <b>Action:</b> Georgiou to ensure sufficient water carts are available for dust suppression and/or apply dustex/ hydromulch to in active work areas.
			No substantiated complaints relating to dust impacts	C	No community complaints related to dust received to date.
		4.5.3.1	Communication with local residents, providing specific information on construction activities which may impact the local area	C	One notification made to residents regarding 24hr use of generator close to residential area. No other works in close proximity to residential area. Evidence: Noise Management Plan Approval Letter - Adjacent to Waste Water Treatment Plant - 11 Brindabella Parkway Alkimos (Nexus: 167211443)
		4.5.3.2	Identify specific dust control measures that will be available on site and document within the CEMP. These may include the use of water carts, sprinklers, soil binding agents and avoiding dust raising activity during periods of high winds.	C	Dustex and hydromulch applied to batters and haul roads. Water trucks on site, and speed limits apply across the site. Evidence: Hydro mulch applied to batter.jpg (Nexus: 167216343)

4.5.3 Controls	Table 21: Dust management minimum actions	4.5.3.3	Plan construction to minimise the potential for airborne dust	C	Dustex and hydromulch applied to batters and haul roads. Water trucks on site, and speed limits apply across the site.
		4.5.3.4	Vehicle movement to be minimised and to remain on designated tracks and maintain appropriate speed to minimise dust generation	C	Haulage routes and LV tracks identified in TMP and prestart board. Site speed limit is 30kmph. Evidence: Prestart Board - Site Map and Fire Rating.jpg (Nexus: 167168735)
		4.5.3.5	Stabilise soil stockpiles to prevent erosion and dust emission	C	Dustex and hydromulch applied to batters and haul roads. Water trucks on site, and speed limits within dusty areas
		4.5.3.6	Dust producing activities to be suspended immediately if dust suppression measures prove ineffective	N/A	Controls have been effective to date, no suspension of works to date. Project has real time dust monitor
4.5.4 Monitoring and Reporting	Table 22: Minimum dust management monitoring requirements	4.5.4.1	Monitor daily weather conditions prior to the commencement of work to determine the potential for dust generation	C	Daily conditions are included in prestart minutes everyday. Evidence: Prestart Minutes 30Jan24- Weather.pdf (Nexus: 167211460)
		4.5.4.2	Visual inspections of dust suppression activities and soil stockpile stability	C	Undertaken by site supervisors
		4.5.4.3	Monitor airborne dust levels and evaluate control measure efficiency	C	One realtime dust monitor on site (near Eastern haul road) is monitored by Site Environmental & Remediation Services Pty Ltd (SERS) who provide Georgiou with a weekly report for dust exceedances. Evidence: Dust monitor report.pdf (Nexus: 167395117)
		4.5.4.4	Maintain a register of any non-conformances or public complaints and provide the register to Water Corporation		Community complaints register viewed, non received to date. Evidence: Community Complaints Register.PNG (Nexus: 167509217)
<b>4.6 Noise and Vibration</b>					
4.6.2 Objectives	Ensure that activities do not unreasonably affect the amenity of surrounding landowners		100% compliance with Section 4 of AS 2436- 2010	C	
			Noise not exceeding guidelines stipulated in <i>Environmental Protection (Noise) Regulations 1997</i>	C	No exceedances of noise to date.
			Construction activities do not extend beyond stipulated and accepted work hours	C	Work hours are 7-19hr Mon-Fri, 7-17hr Sat.
			No substantiated noise related complaints	C	No noise complaints received to date.
4.6.3 Controls	Table 25: Noise and vibration management minimum actions	4.6.3.1	Regular communication with local residents, providing specific information on construction activities which may impact the local area	C	One notification made to residents regarding 24hr use of generator close to residential area. No other works in close proximity to residential area. Evidence: Noise Management Plan Approval Letter - Adjacent to Waste Water Treatment Plant - 11 Brindabella Parkway Alkimos (Nexus: 167211443)
		4.6.3.2	Install signs that provide a contact number for complaints.	NC	External perimeter fencing does not have signage or a contact number. <b>Action:</b> Georgiou to install signage with contact number for complaints on external public facing fencing.
		4.6.3.3	Nominate the equipment types and expected noise emissions for construction activities and how works will be conducted in accordance with Section 4 of AS 2436-2010.	N/A	Self contained insulated generator. Generator is to be oriented so that the quietest side of said equipment faces towards noise sensitive premises. Evidence: Noise Management Plan Approval Letter - Adjacent to Waste Water Treatment Plant - 11 Brindabella Parkway Alkimos (Nexus: 167211443)
		4.6.3.4	Identify appropriate noise and vibration mitigation strategies to minimise impacts on residents and fauna. Document strategies within the CEMP, and implement them during works.	C	Documented in Construction Environmental Management Plan (Rev C) section Appendix 9 – Noise and Vibration Management Plan
		4.6.3.5	Any premises which is likely to receive emissions greater than the levels prescribed in the Environmental Protection (Noise) Regulations must be notified at least 24 hours before the commencement of works.	N/A	Water Corporation responsibility
		4.6.3.6	Work is to be limited to between 0700 and 1900h Monday to Saturday.	C	Work hours are 0700-1900hr Mon-Fri, 0700-1700hr Sat.
		4.6.3.7	Where possible, no truck associated with the work should be left standing with its engine operating in a street adjacent to a residential area (some vehicles such as concrete trucks are required to leave engines running however, they should not be located in residential areas)..	N/A	No works or trucks travel on residential streets.
		4.6.3.8	All mechanical plant is to be silenced by the best practical means using current technology. Mechanical plant, including noise-suppression devices, shall be maintained to the manufacturer's specifications. Internal combustion engines are to be fitted with a suitable muffler in good repair. Fit all pneumatic tools operated near a residential area with an effective silencer on their air exhaust port. Turn off plant when not being used.	C	Plant is maintained and records kept up to date on the plant register. Evidence: Plant Compliance Checklist Register.csv (Nexus: 167130809)
	Table 25: Noise and vibration management minimum actions After hours construction requirements (if applicable)	4.6.3.9	A noise management plan is to be developed detailing: - The work that is required to be completed and the reason for the work to be completed outside of construction working hours - Predicted noise levels associated with these works - The types and duration of activities that may result in noise above the prescribed levels - Controls measures to be implemented to minimise noise and vibration - The monitoring requirements - The complaint response procedure.	C	Documented in Construction Environmental Management Plan (Rev C) section Appendix 9 – Noise and Vibration Management Plan
		4.6.3.10	The noise management plan is to be submitted to the Water Corporation at least 30 days prior to the commencement of works.	C	Documented in Construction Environmental Management Plan (Rev C) section Appendix 9 – Noise and Vibration Management Plan and approved by Water Corporation in Nov-23. Noise management plan for 24hr generator approved by Water Corporation and City of Wanneroo and letter box dropped to residents. Evidence: Noise Management Plan Approval Letter - Adjacent to Waste Water Treatment Plant - 11 Brindabella Parkway Alkimos (Nexus: 167211443)
		4.6.3.11	The Noise Management Plan is to be submitted to the relevant authority to allow approval to be issued at least 7 days prior to the commencement of works.	N/A	Not applicable to this scope of the project. Required for operation of desalination plant.
		4.6.3.12	Any premises which is likely to receive emissions greater than the levels prescribed in the Environmental Protection (Noise) Regulations must be notified at least 24 hours before the commencement of works.	N/A	Nearest sensitive receptor is 1km and would not receive noise levels above prescribed levels

4.6.4 Monitoring and Reporting	Table 26: Noise and vibration management minimum monitoring requirements	4.6.4.1	Monitor noise and vibration emissions using appropriate equipment	N/A	No complaints received therefore no monitoring undertaken.
	Table 27: Noise and vibration management minimum reporting requirements	4.6.4.2	Maintain a register of any non-conformances or public complaints and provide the register to Water Corporation		Community complaints register viewed, non received to date. Evidence: Community Complaints Register.PNG (Nexus: 167509217)
<b>4.7 Fire</b>					
4.7.2 Objectives	Ensure that Fire risk is reduced as much as is reasonably practicable.		No injuries or fatalities from fire	C	No fire incidents to date
			No impact to infrastructure from fire	C	No fire incidents to date
4.7.3 Controls	Table 29: Fire management minimum actions	4.7.3.1	Upgrade all existing tracks at SDP site to a standard suitable for First Attack Fire Appliances	N/A	Water Corporation responsibility
		4.7.3.2	Maintain permanent safe access and egress from site SDP site	C	Site egress maintained as per Traffic Management Plan
		4.7.3.3	Maintain security grade lockable access gates where the fire tracks traverse the fence lines	N/A	Water Corporation responsibility.
		4.7.3.4	Provide DFES with access to the gates	C	Access gate is manned but can be bypassed in an emergency scenario
		4.7.3.5	Temporary fencing on the boundary of Lot 3000 will be installed	C	Temporary fencing surrounds entire project area. Evidence: Project perimeter fencing.jpg (Nexus: 167416423)
		4.7.3.6	Install temporary signage identifying private property, conservation areas and trespass prohibition of appropriate wording, size and standard at 500m spacing along the temporary fence lines of Lot 3000	C	Signage is installed on Northern boundary along conservation area. Evidence: Conservation area demarcation flagging and signage.jpg (Nexus:167152118)
		4.7.3.7	Install and maintain signage identifying construction works and contact details at 500m spacing along temporary hard fencing areas (as required in Section 4.4).	NC	See item 4.6.3.2.
		4.7.3.8	Have current fire danger signage at site office which is updated daily based on check of DFES website and communicated to contractors during daily pre-start meetings	C	Weather monitored daily and fire danger warning displayed on Prestart board in laydown. Evidence: Prestart Board - Site Map and Fire Rating.jpg (Nexus: 167168735)
		4.7.3.9	Prepare a bushfire evacuation plan including a map showing assembly points, a list of fire wardens on site (or responsible staff in the event of a fire), and contact details for fire fighting services.	C	Project has emergency response plan and emergency evacuation plan detailing fire response and muster points. Documented in Construction Environmental Management Plan (Rev C) section 12. Incident, Emergency Preparedness and Response
		4.7.3.10	A Safety Officer will be designated for each construction area and it will be a part of their role to identify and rectify potential fire hazards. Construction staff will report potential fire hazards to the Safety Officer.	C	All project personnel have duty of care to report potential fire hazards No potential fire hazards reported to date.
		4.7.3.11	The lighting and smoking of cigarettes will be prohibited except in designated cleared areas and immediately outside of site buildings.	OFI	Designated smoking area adjacent to crib hut, no signage or appropriate butt out bin (empty can). <b>OFI:</b> Install smoking area signage and appropriate butt-out bin in designated smoking area.
		4.7.3.12	Cleared vegetation from the construction area will not be burned.	N/A	No burning of vegetation has occurred
		4.7.3.13	Dry chemical or carbon dioxide fire extinguishers will be located in close proximity to all cutting, grinding or welding (or any other spark generating activity).	N/A	No hot works areas or works to date
		4.7.3.14	Dry chemical or carbon dioxide fire extinguishers will be located in close proximity to all cutting, grinding or welding (or any other spark generating activity).	N/A	No hot works areas or works to date
		4.7.3.15	A shroud will be installed if cutting, grinding or welding (or any other spark generating activity) occurs within 5m of vegetation/dry grasses. The shroud will be installed between the activity and the vegetation to capture sparks.	N/A	No hot works or grinding works to date
		4.7.3.16	Flammable liquids and materials (including explosives) will only be stored in designated areas fitted with a dry chemical or carbon dioxide fire extinguisher.	C	Flammable material stored within designated and self bunded chemical container with fire extinguisher. Bulk diesel storage tank also has fire extinguisher adjacent to tank. Evidence: Chemical container and Hydrocarbon waste bin with spill kit.jpg (Nexus: 167140348). Refuelling fire extinguisher.jpg (Nexus: 167166474)
		4.7.3.17	On the advice of FESA, construction work that may present a high risk of ignition (e.g. cutting, grinding or welding) may be temporarily terminated on days declared to have a "very high" or "extreme" fire danger and if there are a number of fires in close proximity in order to avoid the potential for further depletion of fire fighting resources.	N/A	No burning of vegetation has occurred
		4.7.3.18	It will be ensured that all construction vehicles will be fitted with a dry chemical or carbon dioxide fire extinguisher	C	Three vehicles checked and had fire extinguisher. Evidence: DT-05 fire extinguisher.jpg (Nexus: 167162746)
		4.7.3.19	There will be daily inspections of all construction vehicles to remove combustible material from radiators, tracks, guards and undercarriages.	C	Included in plant daily prestart: Evidence: Dump Truck DT-06 Prestart Check.jpg (Nexus: 167129296).
		4.7.3.20	It will be ensured that construction vehicles are inspected and serviced to prevent or repair oil and fuel leaks prior to the start of construction works, and then inspected monthly.	C	All plant serviced and inspected as per vehicle prestarts. Evidence: Dump Truck DT-06 Prestart Check.jpg (Nexus: 167129296).
		4.7.4.1	Inspect and repair/replace all fences and signage quarterly	C	Fencing inspected as part of weekly enviro inspection, no damages/ reported to date
		4.7.4.2	Inspect and repair gates quarterly	N/A	Water Corporation maintains gates, no damage to date
		4.7.4.3	Conduct ad hoc security patrols on the roads and tracks	C	Permanent security monitors main access gate to control access to site.

4.7.4 Monitoring and Reporting	Table 30: Fire management minimum monitoring requirements	4.7.4.4	Report evidence of unauthorised access to Water Corporation within 24 hours of identification of incident	C	Contractor maintains a trespass register. Two incidents to date both reported to WC. Reports are reported at Weekly progress meetings. Evidence: Trespass register.png (Nexus: 167228835). CW03713-MOM-007 Alkimos Enabling Earthworks - Progress Meeting - 23 Jan 2024.pdf (Nexus: 167219607).
		4.7.4.5	Report and act upon damage to fences, signage and vegetation in conservation areas from such unauthorised access	N/A	No damage reported to date
<b>4.8 Aboriginal Heritage</b>					
4.8.2 Objective	Prevent impacts on items or places of heritage value	No damage to heritage areas/items		C	No damage reported to date
4.8.3 Controls	Table 33: Aboriginal Heritage minimum actions	4.8.3.1	A Cultural Monitor will be employed in consultation with the relevant Whadjuk Noongar business groups (as advised by Water Corporation) to monitor initial ground disturbing activities at any registered Aboriginal heritage site identified. The Cultural Monitor will be paid at a rate in accordance with The Water Corporations policies for Cultural Monitors. The Cultural Monitor will monitor initial ground disturbing activities to: - detect the presence of archaeological material of heritage significance. - detect human skeletal material. - advise on minimisation of construction impacts on heritage values	C	Cultural monitors are employed from Indigenous Economic Solutions (IES) as cultural heritage monitors and four are on site full-time for the duration of earthworks.
		4.8.3.2	Shade, water and personal protective equipment (hard hat, safety glasses, noise (ear) protection and high visibility vest) will be provided to the Cultural Monitor. The Cultural Monitor will be responsible for personal transport to the construction areas.	C	PPEs, shade, regular breaks and water is provided to monitors daily.
		4.8.3.3	Construction works will be undertaken in the absence of the Cultural Monitor if for any reason the arranged Cultural Monitor does not attend the site. A replacement Cultural Monitor will be sort as soon as reasonably practicable following the absence if future attendance at the construction works by the Cultural Monitor is unlikely.	C	Monitors have been on site and have access to site at all times
		4.8.3.4	Construction works will cease as soon as practicable within a nominal 20 metres of any archaeological material (artefacts including hunting tools, scatters, scar trees) identified within the construction area. An archaeologist will be engaged to record the identified material and to advise the DPLH if the identified material is likely to be of Aboriginal heritage significance. Construction activities within 20 metres of the identified material will only recommence based on advice of the archaeologist or the DPLH.	C	No archaeological material identified to date.
		4.8.3.5	Construction works will cease as soon as practicable within a nominal 20 metres of any skeletal material identified within the construction area. The Police (Phone 131 444) will be contacted to attend and determine a resolution of the matter. Construction activities will only recommence within 20 metres of the identified material on the direction of the Superintendent based on advice of the Police	N/A	No skeletal material found to date
		4.8.3.6	Any dispute between the Cultural Monitor and site construction personnel will be resolved on advice from the Water Corporation's Manager of the Aboriginal Heritage and Native Title section.	N/A	No disputes to date
<b>4.9 Contaminated Sites, Acid Sulfate Soils and Dewatering</b>					
4.9.2 Objectives	Prevent the spread of contaminants within the DEs		No proliferation of contaminants as a result of any construction activity	N/A	No dewatering or ASS scope management within Georgiou's scope.
			All contaminated soil treated or disposed of in accordance with best practice guidelines and an Asbestos Management Plan / Hazardous Waste Management Plan	N/A	No dewatering or ASS scope management within Georgiou's scope.
			All soil suspected or identified to be ASS shall be treated and disposed of in accordance with best practice guidelines and an ASS Management Plan	N/A	No dewatering or ASS scope management within Georgiou's scope.
		Maximise beneficial re-use of soil to enable successful revegetation.	100% of native topsoil re-used	C	Non weed impacted topsoil being stockpiled separately for later reuse in accordance with Weed Management Plan (Nexus: 163725348).
		Prevent acidification of land or water resulting from the disturbance of ASS	100% compliance with Asbestos, ASS and Dewatering Management Plans	N/A	No dewatering or ASS scope management within Georgiou's scope.
		Obtain a Dewatering licence from DWER	All ASS or PASS identified and effectively treated prior to re-use	N/A	No dewatering or ASS scope management within Georgiou's scope.
		Prevent impacts to surrounding beneficial uses of ground/surface water	100% compliance with the conditions of the licence	N/A	No dewatering or ASS scope management within Georgiou's scope.
		Prevent impacts to vegetation resulting from groundwater drawdown	No substantial interruption to supply or quality of nearby water sources	N/A	No dewatering or ASS scope management within Georgiou's scope.
		Prevent impacts to the quality of surface and groundwater	No decline in vegetation health resulting from groundwater drawdown	N/A	No dewatering or ASS scope management within Georgiou's scope.
		No exceedance of groundwater drawdown limits	N/A	No dewatering or ASS scope management within Georgiou's scope.	
		No uncontrolled discharge	N/A	No dewatering or ASS scope management within Georgiou's scope.	
4.9.3 Controls	Table 37: Contamination management minimum actions	4.9.3.1	Obtain a dewatering licence through DWER	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.2	Document conditions of dewatering licence within ASS and Dewatering Management Plan	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.3	Further develop and adhere to site-specific ASS and Dewatering Management Plan	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.4	For the pipeline construction in shallow groundwater areas, excavation lengths are to be limited to 50m and are to be open for two to three weeks. Disposal of treated groundwater shall be via irrigation within 50 m of the dewatering location, where there are no engineering or site constraints (lack of suitable land to establish re-inflation trenches or ponds).	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.5	Develop and adhere to Asbestos Management Plan	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.6	All staff and Contractors involved in earthwork activities will be inducted on the potential impacts relating to ASS, dewatering	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.7	Contaminated sites to be identified within the DEs and clearly demarcated	N/A	No dewatering or ASS scope management within Georgiou's scope.

		4.9.3.8	If suspected asbestos is observed during works, an 'Unexpected Finds Protocol' shall be enacted, as directed by the Asbestos Management P		No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.9	Accurate stockpiling of soil to distinguish contaminated soil from non-contaminated soil	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.10	Clearly defined stockpiles will be created during excavation and earthworks	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.11	Apply appropriate treatment or disposal techniques for contaminated soil	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.12	Safely contain hazardous waste and prevent exposure of harmful substances (such as asbestos) to personnel or the public through correct handling and disposal	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.13	Minimise changes to groundwater levels by adopting construction methods that minimise impacts	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.3.14	Conduct testing of groundwater to determine levels of metals, nutrients and other components	N/A	No dewatering or ASS scope management within Georgiou's scope.
4.9.4 Monitoring and Reporting	Table 38: Contamination management minimum monitoring requirements	4.9.4.1	Maintain records of treatment or disposal of contaminated soil	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.4.2	Establish baseline water level and quality	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.4.3	Conduct monitoring to confirm the effectiveness of the applied measures as detailed in the site-specific ASS and Dewatering Management Plan. Identify and implement contingency measures to restore groundwater to an acceptable level.	N/A	No dewatering or ASS scope management within Georgiou's scope.
	Table 39: Contamination management minimum reporting requirements	4.9.4.4	Report on the treatment or disposal of contaminated soil	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.4.5	Results of ASS monitoring and analysis to be provided to Water Corporation for review then forwarded to DWER as per conditions of dewatering licence	N/A	No dewatering or ASS scope management within Georgiou's scope.
		4.9.4.6	Report on the hydrology monitoring results, including water quality and the volume, rate, and duration of dewatering	N/A	No dewatering or ASS scope management within Georgiou's scope.
<b>4.10 Flushing</b>					
4.10.2 Objectives	Prevent leaks of chlorinated water to land, surface water or ground water Prevent the contamination of water or soils as a result of commissioning works		No uncontrolled spills of chlorinated water	N/A	No flushing works occurred to date.
			No disposal of hyper-chlorinated water without prior treatment	N/A	No flushing works occurred to date.
			Chlorinated water to be discharged safely and as specified in a site-specific CEMP	N/A	No flushing works occurred to date.
4.10.3 Controls	Table 41: Flushing management minimum actions	4.10.3.1	Ensure all approvals and licences are obtained prior to the discharge of chlorinated water used in the flushing of pipes (including liaison with DBCA prior to disposal to any wetland areas)	N/A	No flushing works occurred to date.
		4.10.3.2	All conditions of the dewatering licence shall be adhered to during the flushing process, including the implementation of a Dewatering Management Plan	N/A	No flushing works occurred to date.
		4.10.3.3	Ensure discharge of chlorine-treated water is directed to an identified and approved discharge location/system	N/A	No flushing works occurred to date.
4.10.4 Monitoring and Reporting	Table 42: Flushing activities minimum monitoring requirements Table 43: Flushing activities minimum reporting requirements	4.10.4.1	Monitor chlorine concentration in water during flushing and discharge	N/A	No flushing works occurred to date.
		4.10.4.2	Reporting of commissioning and monitoring results	N/A	No flushing works occurred to date.
		4.10.4.3	Reporting of discharge spills	N/A	No flushing works occurred to date.
<b>4.11 Chemical Use (or other activities that may cause contamination)</b>					
4.11.2 Objectives	Prevent impacts to land, surface water or ground water resulting from chemical storage		100% adherence to Safety Data Sheet information for each chemical used	C	SDS adhered to.
			No uncontrolled spills of dangerous goods or hazardous substances.	C	No uncontrolled spills reported to date.
4.11.3 Controls	Table 45: Chemical use minimum actions	4.11.3.1	All chemicals are to be stored in accordance with relevant Australian standards, including: - AS1940: The Storage and Handling of Flammable and Combustible Liquids - AS3780 The Storage and Handling of Corrosive Substances	C	Flammable material stored within designated and self bunded chemical container with fire extinguisher. Bulk diesel storage tank also has fire extinguisher adjacent to tank. Evidence: Chemical container and Hydrocarbon waste bin with spill kit.jpg (Nexus: 167140348). Refuelling fire extinguisher.jpg (Nexus: 167166474)
		4.11.3.2	Identify all additives that will be used and demonstrate their suitability and safe use procedures	C	Documented in Construction Environmental Management Plan (Rev C) Appendix 4 - Hydrocarbon and Chemical Management Sub Plan
		4.11.3.3	Each operator using a given chemical to read and fully understand the Safety Data Sheet	C	Documented in Construction Environmental Management Plan (Rev C) Appendix 4 - Hydrocarbon and Chemical Management Sub Plan
		4.11.3.4	Spill kits are to be readily available at chemical storage locations and during maintenance, refuelling or transfer of chemicals.	C	Spill kits available at refuelling area, chemical container and generators. Evidence: Photos of spill kits: Nexus:167140348, 167145221, 167150469, 167144218
		4.11.3.5	All refuelling and servicing of plant, vehicles and equipment is to occur on a bunded area at least 100 m from any National Park, State Forest, TEC, PEC, Bush Forever Sites waterway or wetland	C	Refuelling/ maintenance undertaken in bunded area. Grate installed in refuel area, black plastic was installed under entire refuel area. Evidence: Refuelling Area.jpg (Nexus: 167233944), Fuel Cell Black Plastic.PNG (Nexus: 167222875)
		4.11.3.6	All on-site maintenance of plant, equipment and vehicles must be in designated, bunded areas.	C	Refuelling/ maintenance undertaken in bunded area. Grate installed in refuel area, black plastic was installed under entire refuel area. Evidence: Refuelling Area.jpg (Nexus: 167233944), Fuel Cell Black Plastic.PNG (Nexus: 167222875)
		4.11.3.7	No chemical storage, transfer or handling to occur in areas within 50 m of sensitive areas such as a National Park, State Forest, TEC, PEC, ESA, Bush Forever sites, or a surface water feature, including wetlands, damplands and drainage lines	C	No chemical storage within 50m of sensitive areas
		4.11.3.8	The contractor to record all spills and the management of the spill in a register maintained on site	C	No spills reported to date
4.11.4 Monitoring and Reporting	Table 46: Chemical use monitoring requirement Table 47: Chemical use reporting requirements	4.11.4.1	Inspect project area for spills during clearing and construction	C	Part of weekly enviro inspection. Site induction requires all spills to be reported. No spills to date.
		4.11.4.2	The contractor to report all spills within 24 hours to Water Corporation; and detail the spill response/management	N/A	No spills reported to date
<b>4.12 Greenhouse Gas Emissions</b>					

4.12.2 Objectives	Maintain emissions and carbon footprint to as low as practically possible		100% compliance with the approved GHG Management Plan.	C	
4.12.3 Controls	Table 49: Greenhouse gas emissions management minimum action	4.12.3.1	Competitive bid strategies will be used to design, build and operate the plant. This ensures world's best practice from international consortia bidding for the design and ongoing operations of the plant to maximise energy efficiency and therefore to minimise GHG emissions	N/A	Water Corporation responsibility
		4.12.3.2	All personnel to read and implement the measures identified in the Greenhouse Gas Management Plan to reduce emissions	C	
		4.12.3.3	Implement sustainable design and construction methods	C	Crib rooms have switch off lights Noise plan details controls to turn off plant and reduce use
		4.12.3.4	Improve energy efficiency and reduce fuel use where possible	C	Generators and mechanical plant are turned off when not in use
4.12.4 Monitoring and Reporting	Table 50: Greenhouse gas emissions reporting requirements		Monitor energy and fuel use	C	Each machine/vehicle has a fuel tab to monitor fuel usage. Reported monthly in sustainability report. Evidence: Sustainability Monthly-reporting-form-Dec 041223.xlsx (Nexus: 166984724)
	Table 51: Greenhouse gas emissions monitoring requirements		Report energy and fuel use to Water Corporation	C	Reported monthly in sustainability report Sustainability Monthly-reporting-form-Dec 041223.xlsx (Nexus: 166984724)
<b>4.13 Waste Management</b>					
4.13.2 Objectives	Prevent the contamination of land or soils as a result of waste disposal. Prevent the spread of contaminated soils or substances Reduce the generation of waste/resource use of the project		No waste outside of DE.	C	No waste observed outside of DE during site inspection
			All waste removed from DE at the completion of works.	N/A	Final check to be undertaken on completion of works
			All contaminated material treated or disposed in accordance with an appropriate Hazardous Waste Management Plan	N/A	No contaminated material encountered to date
			Per cent of waste reused or recycled	C	Reported monthly in sustainability report Sustainability Monthly-reporting-form-Dec 041223.xlsx (Nexus: 166984724)
4.13.3 Controls	Table 53: Waste management minimum actions	4.13.3.1	Separate and clearly marked waste bins will be kept at the site office for all major waste streams including (but not limited to): - General waste - Recyclables - Steel recycling - Hydrocarbons	C	Waste segregated into metal, paper/ cardboard, general waste and hydrocarbons. Evidence: Laydown lidded skip bins.jpg (Nexus: 167129297) Laydown Stored Metal Waste.jpg (Nexus: 167138966), Chemical container and Hydrocarbon waste bin with spill kit.jpg (Nexus: 167140348)
		4.13.3.2	All waste bins on site will have securely fitted lids to prevent the attraction of fauna or movement of waste in wind/weather.	C	All waste bins have secure lids. Evidence: Laydown lidded skip bins.jpg (Nexus: 167129297) Laydown Stored Metal Waste.jpg (Nexus: 167138966), Chemical container and Hydrocarbon waste bin with spill kit.jpg (Nexus: 167140348)
		4.13.3.3	Provide secure toilet facilities located in an appropriate position which prevents any potential spills from being detrimental to the environment	C	Toilets are located on hardstand area away from the environment. Evidence: Laydown Area - Site Toilet Facility.jpg (Nexus: 1671402810)
		4.13.3.4	Remove all general waste from site, and dispose of to suitable landfill facility, as often is required to prevent overflow of waste receptacles.	C	Waste removed as required, volumes reported monthly in sustainability report Evidence: Sustainability Monthly-reporting-form-Dec 041223.xlsx (Nexus: 166984724)
		4.13.3.5	Safely contain hazardous/controlled waste and prevent exposure of harmful substances to personnel or the public through correct handling and disposal	C	Separate hydrocarbons waste bin. Evidence: Chemical container and Hydrocarbon waste bin with spill kit.jpg (Nexus: 167140348)
		4.13.3.6	Hydrocarbon waste to be disposed of to a Controlled Waste Contractor licensed under the Environmental Protection (Controlled Waste) Regulations 2004 (WA);	N/A	No hydrocarbon waste removed from site to date
		4.13.3.7	Wastes, other than excess overburden (excluding spoil) will not be buried on any construction site.	C	No waste buried on site
		4.13.3.8	All wastes will be removed from all construction sites following the completion of construction works	C	No waste left on construction site
		4.13.3.9	Excess overburden produced from trench excavation will be disposed of to: a. the excavated trench. b. a suitable location agreed with the Landowner (the Landowner has first preference to retain excess overburden from their own property), c. a suitable location agreed with adjacent landowners (with preference to Landowners on the pipeline route). d. a local landfill as inert waste. Other suitable sites for disposal of excess overburden may be identified by the contractor but shall be approved by Water Corporation. Disposal of soils affected by ASS will be treated as per the ASS DMP prior to disposal.	N/A	No trenching works undertaken to date
4.13.4 Monitoring and Reporting	Table 54: Waste management monitoring requirements		Schedule regular site waste inspections and clean ups	C	Included in weekly enviro inspection
			Maintain a log of waste disposal (type, volume, disposal method and location) and all controlled waste disposal tracking records		Recorded in Sustainability report and provided monthly to Water Corporation. Evidence: Sustainability Monthly-reporting-form-Dec 041223.xlsx (Nexus: 166984724)
	Table 55: Waste management reporting requirements		Provide records of the disposal of all controlled wastes to Water Corporation	N/A	No controlled waste records requested to date
<b>4.14 Reinstatement and Revegetation</b>					
4.14.2 Objectives	No change to pre-construction condition of landscape		Achieve stabilisation and minimise erosion and sedimentation	N/A	No reinstatement works undertaken to date.
			Support the pre-existing land use in areas not required to remain cleared	N/A	No reinstatement works undertaken to date.
			Restore disturbed soil profiles and landforms to pre-existing contours	N/A	No reinstatement works undertaken to date.
	Revegetation of cleared areas of native vegetation (including dune vegetation) to a condition that supports a self-sustaining plant community with comparable density and		Revegetation of all temporarily cleared areas	N/A	No reinstatement works undertaken to date.
			Success criteria in Revegetation Plan achieved	N/A	No reinstatement works undertaken to date.

4.14.3 Controls	Table 57: Reinstatement and revegetation controls	4.14.3.1	Cleared vegetation from within Conservation areas (as listed in 4.4) to be mulched and stockpiled, and soil to be stockpiled separately	N/A	No reinstatement works undertaken to date.
		4.14.3.2	Areas to be revegetated shall be reshaped and compacted, following backfill of excavations, so that the gradient of the landscape is consistent with that of the surrounding landscape and to minimise erosion, with slopes not exceeding 10 degrees.	N/A	No reinstatement works undertaken to date.
		4.14.3.3	Compacted areas shall be ripped and scarified along the contour to alleviate soil compaction that may limit the growth of vegetation, to a depth of no greater than 300 – 500 mm or as determined to be suitable by the Contractor undertaking revegetation works	N/A	No reinstatement works undertaken to date.
		4.14.3.4	After backfilling, compacting and ripping, topsoil is to be spread over the area it was sourced from, followed by mulch.	N/A	No reinstatement works undertaken to date.
		4.14.3.5	Herbicide shall be strategically applied if weeds germinate within topsoil stockpiles or re-spread areas prior to implementation of revegetation (selected herbicide is to be approved by Water Corporation prior to use)	N/A	No reinstatement works undertaken to date.
		4.14.3.6	Any logs, branches and rocks that may be available shall be spread throughout the revegetation area in order to minimise erosion and increase availability of fauna habitat and provide microhabitats for seed lodgement and germination	N/A	No reinstatement works undertaken to date.
		4.14.3.7	Implementation of ongoing weed, pest and disease hygiene controls, as per Section 4.2.	N/A	No reinstatement works undertaken to date.
		4.14.3.8	Hygiene controls, as per Section 4.2. Contractor During and post construction 4.14.3.8 Implementation of Tranen's Revegetation Plan for the SDP site, and pipeline where appropriate: - Timing: Post autumn rain following completion of construction - Method: Direct seeding and seedling planting	N/A	No reinstatement works undertaken to date.
4.14.4 Monitoring and Reporting	Table 58: Minimum reinstatement and revegetation monitoring requirements	4.14.4.1	Environmental inspections of revegetation works.	N/A	No reinstatement works undertaken to date.
	Table 59: Minimum reinstatement and revegetation reporting requirements	4.14.4.2	Photographic evidence of proposed clearing area before and after clearing and revegetation.	N/A	No reinstatement works undertaken to date.

## Appendix 2: Audit of Alkimos Water Precinct Environmental Management Plan

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/188513660>

#	Action	Monitoring	Timing	Adaptive Management	Compliance Status (C, NC, OFI, N/A)	Comment/ Observations
<b>Vegetation Management</b>						
V1	Prior to clearing all relevant permit and approvals shall be reviewed and any clearing requirements identified and communicated to Contractors and site boundaries demarcated.	Aerial imagery audit.	Annual	- Coordinate meeting with Operations and Projects Teams to educate on clearing requirements. - Investigate revegetation measures. - Implement additional measures on site to prevent access (fencing)	C	Site walkthrough completed for pre-clearing walkthrough. Requirements are communicated through Safe Work Method Statements (SWMS) and prestart. Evidence: Safe Work Method Statement - Clearing & Grubbing - Georgiou ASDP.pdf (Nexus: 167403878), Prestart meeting pre clearing.pdf (Nexus: 167398813)
V2	All site visitors and contractors advised of protections to vegetation outside cleared areas.	Confirm inclusion in Alkimos Water Precinct site induction	Annual	Coordinate meeting with Operations and Projects Teams to educate.	C	All workers undertake site specific induction that contains environmental risks for the project. Records are kept on Beacon. Training records checked. Site Induction Checklist.docx (Nexus: 167124588), ASDP Induction Presentation.pptx (Nexus: 167397977)
V3	Ensure equipment and machinery is clean on entry.	Dieback survey (if baseline survey identifies potential).	5-year	If dieback is identified, develop dieback management plan in accordance with DBCA advice.	C	Alkimos SDP Enabling Earthworks Weed and Dieback Survey and Dieback Management Plan developed in consultation with DBCA (refer correspondence dated 21/11/2023 Nexus: 163722762)
V4	Maintain fences to prevent unauthorised access.	Site inspections	Annual	If continued access occurs, consider more significant fencing options.	C	Site perimeter secured with temporary 1.8m high fencing, entry is managed through a manned gate. Permanent ring lock fencing has been installed around all conservation areas. Evidence: North boundary fence 1 metre buffer and flagging.jpg (Nexus: 167152118)
V5	Ensure equipment and machinery is clean on entry.	Weed survey	5-year	If weeds are identified, develop weed management plan for site.	C	Alkimos SDP Enabling Earthworks Weed and Dieback Survey and Dieback Management Plan developed in consultation with DBCA (refer correspondence dated 21/11/2023 Nexus: 163722762).  Project induction contains section on weed hygiene and dieback management. Evidence: Site Induction Checklist.docx (Nexus: 167124588), ASDP Induction Presentation.pptx (Nexus: 167397977).  All machines inspected prior to entry to site.
V6	Maintain fences to prevent unauthorised access.	Site inspections	Annual	If continued access occurs, consider more significant fencing options.	C	Site perimeter secured with temporary 1.8m high fencing, entry is managed through a manned gate and 24/7 security patrol. Permanent ring lock fencing has been installed around all conservation areas. Evidence: North boundary fence 1 metre buffer and flagging.jpg (Nexus: 167152118)
V7	Ensure any water abstraction from Water Corporation activities does not impact vegetation.	Confirmation through aerial imagery audit that no vegetation impacted	Annual	Investigate potential causes of vegetation decline and causes and investigate reduced abstraction.	C	Aerial imagery captured monthly via drone and compared to baseline/ surrounding vegetation. Weekly groundwater monitoring program of monitoring bores to monitor groundwater levels and salinity during dewatering activities.
<b>Landforms Management</b>						

L1	Prior to disturbance, approvals shall be reviewed, and any disturbance requirements identified and communicated to Contractors and site boundaries demarcated.	Aerial imagery audit	Annual	<ul style="list-style-type: none"> <li>- Coordinate meeting with Operations and Projects Teams to educate on landform requirements.</li> <li>- Investigate measures to stabilise landform.</li> <li>- Implement additional measures on site to prevent access (fencing)</li> </ul>	C	Site walkthrough completed for pre-clearing walkthrough. Requirements are communicated through Safe Work Method Statements (SWMS) and prestart. Evidence: Safe Work Method Statement - Clearing & Grubbing - Georgiou ASDP.pdf (Nexus: 167403878), Prestart meeting pre clearing.pdf (Nexus: 167398813)
L2	Maintain fences to prevent unauthorised access.	Site inspections	Annual	If continued access occurs, consider more significant fencing options.	C	Site perimeter secured with temporary 1.8m high fencing, entry is managed through a manned gate and 24/7 security patrol. Permanent ring lock fencing has been installed around all conservation areas. Evidence: North boundary fence 1 metre buffer and flagging.jpg (Nexus: 167152118)
<b>Terrestrial Fauna Management</b>						
F1	Prior to disturbance, approvals shall be reviewed, and any disturbance requirements identified and communicated to Contractors and site boundaries demarcated.	Confirmation through aerial imagery audit and authorised projects that no vegetation (fauna habitat) impacted outside	Annual	<ul style="list-style-type: none"> <li>- Coordinate meeting with Operations and Projects Teams to educate on vegetation (fauna habitat) requirements.</li> <li>- Investigate revegetation measures.</li> <li>- Implement additional measures on site to prevent access (fencing).</li> </ul>	C	Site walkthrough completed for pre-clearing walkthrough. Requirements are communicated through Safe Work Method Statements (SWMS) and prestart. Evidence: Safe Work Method Statement - Clearing & Grubbing - Georgiou ASDP.pdf (Nexus: 167403878), Prestart meeting pre clearing.pdf (Nexus: 167398813)
F2	Maintain fences to prevent unauthorised access	Site inspections	Annual	If continued access occurs, consider more significant fencing options.	C	Site perimeter secured with temporary 1.8m high fencing, entry is managed through a manned gate and 24/7 security patrol. Permanent ring lock fencing has been installed around all conservation areas. Evidence: North boundary fence 1 metre buffer and flagging.jpg (Nexus: 167152118)
F3	Enforce speed limits on roads and tracks to prevent fauna interaction.	Site inspections	Annual	If continued impacts occur, consider reducing speed limits further.	C	Site speed limit is 40 km/h and is sign-posted throughout the site.
F4	Manage firebreaks to minimise uncontrolled burns and allow for fauna egress.	Site inspections	Annual	Investigate additional firebreak options to prevent fire impacts to fauna habitat.	C	Project is within completely cleared area within fenced boundary. Firebreak maintained around project boundary
F5	Undertake pest management to minimise impacts to fauna.	Fauna Survey	Biennial	Investigate more regular pest control to isolate specific species.	C	City of Wanneroo undertakes feral animal pest control in the public areas adjacent to the project. No feral animal sightings to date.

### **Appendix 3: Email Submission of Artificial Nest Hollow Management Plan**

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/189792349>

**From:** [Paul Zahra](#)  
**To:** [Fiona Rowland](#)  
**Subject:** FW: ASDP - Artificial Nest Hollow Management Plan  
**Date:** Thursday, 31 October 2024 11:50:10 AM  
**Attachments:** [WC-R- Black Cockatoo Artificial Hollow Management Plan V1.pdf](#)

---

**From:** Paul Zahra  
**Sent:** Tuesday, May 7, 2024 11:25 AM  
**To:** EAD South WA <[REDACTED]>  
**Cc:** Nash, Graham <[REDACTED]>  
**Subject:** ASDP - Artificial Nest Hollow Management Plan

Hi

Please find attached 4 of 5 Offset Management Plans submitted for the Alkimos Seawater Desalination Plant project.

Included is the Artificial Nest Hollow Management Plan.

If you have any questions or concerns, please contact me.

Regards

**Paul Zahra**  
Specialist - Environmental Approvals & Delivery  
Assets Planning and Delivery  
John Tonkin Water Centre  
629 Newcastle Street, Leederville WA 6007

[REDACTED]  
[REDACTED]



## **Appendix 4: Email Submission of Alkimos, Carabooda and Eglinton Offset Management Plans**

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/189800606>

**From:** [EAD South WA](#)  
**To:** [Paul Zahra](#)  
**Cc:** [Nash, Graham](#)  
**Subject:** RE: ASDP - Carabooda Tank Offset Management Plan [SEC=OFFICIAL]  
**Date:** Friday, 3 May 2024 9:50:25 AM  
**Attachments:** [~WRD0001.jpg](#)

---

**Caution:** This email originated from outside the organisation. If you are unsure on the legitimacy of this email do not click on any links or download attachments.

Hi Paul, email 1 of 5 received. 3 attachments.

---

**From:** Paul Zahra [REDACTED]  
**Sent:** Thursday, May 2, 2024 5:43 PM  
**To:** EAD South WA <EADSouthWA@dceew.gov.au>  
**Cc:** Nash, Graham [REDACTED]  
**Subject:** ASDP - Carabooda Tank Offset Management Plan

Hi

Please find attached 1 of 5 Offset Management Plans submitted for the Alkimos Seawater Desalination Plant project.

Included is:

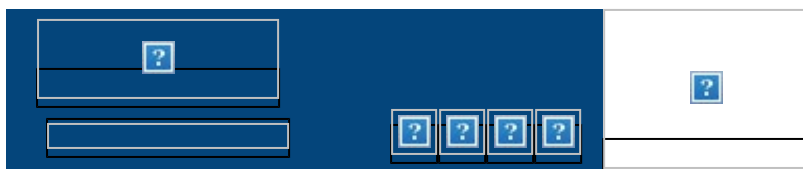
- [Carabooda Tank Site Offset Management Plan](#),
- A document that outlines where each condition is addressed in both Commonwealth and State approvals, and
- Spatial data of the location and survey information for the site.

If you have any questions or concerns, please contact me.

Regards

**Paul Zahra**  
Specialist - Environmental Approvals & Delivery  
Assets Planning and Delivery  
John Tonkin Water Centre  
629 Newcastle Street, Leederville WA 6007

■ [REDACTED]  
■ [REDACTED]



**From:** [EAD South WA](#)  
**To:** [Paul Zahra](#)  
**Cc:** [Nash, Graham](#)  
**Subject:** RE: ASDP - Alkimos Offset Management Plan [SEC=OFFICIAL]  
**Date:** Friday, 3 May 2024 9:50:45 AM

---

**Caution:** This email originated from outside the organisation. If you are unsure on the legitimacy of this email do not click on any links or download attachments.

Hi Paul, email 2 of 5 received. 3 attachments.

---

**From:** Paul Zahra <[REDACTED]>  
**Sent:** Thursday, May 2, 2024 5:44 PM  
**To:** EAD South WA <EADSouthWA@dcceew.gov.au>  
**Cc:** Nash, Graham [REDACTED]  
**Subject:** ASDP - Alkimos Offset Management Plan

Hi

Please find attached 2 of 5 Offset Management Plans submitted for the Alkimos Seawater Desalination Plant project.

Included is:

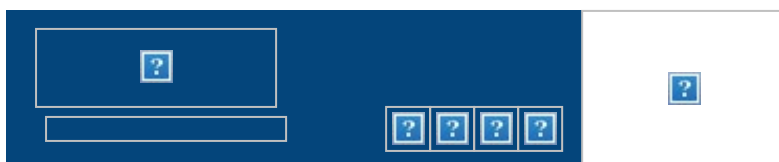
- Alkimos Site Offset Management Plan,
- A document that outlines where each condition is addressed in both Commonwealth and State approvals, and
- Spatial data of the location and survey information for the site.

If you have any questions or concerns, please contact me.

Regards

**Paul Zahra**  
Specialist - Environmental Approvals & Delivery  
Assets Planning and Delivery  
John Tonkin Water Centre  
629 Newcastle Street, Leederville WA 6007

■ [REDACTED]  
■ [REDACTED]



**From:** [EAD South WA](#)  
**To:** [Paul Zahra](#)  
**Cc:** [Nash, Graham](#)  
**Subject:** RE: ASDP - Eglinton Offset Management Plan [SEC=OFFICIAL]  
**Date:** Friday, 3 May 2024 9:51:06 AM

---

**Caution:** This email originated from outside the organisation. If you are unsure on the legitimacy of this email do not click on any links or download attachments.

Hi Paul, email 3 of 5 received. 3 attachments.

---

**From:** Paul Zahra [REDACTED]  
**Sent:** Thursday, May 2, 2024 5:44 PM  
**To:** EAD South WA <EADSouthWA@dceew.gov.au>  
**Cc:** Nash, Graham [REDACTED]  
**Subject:** ASDP - Eglinton Offset Management Plan

Hi

Please find attached 3 of 5 Offset Management Plans submitted for the Alkimos Seawater Desalination Plant project.

Included is:

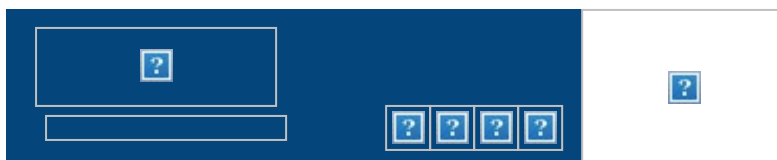
- [Eglinton Site Offset Management Plan](#),
- A document that outlines where each condition is addressed in both Commonwealth and State approvals, and
- Spatial data of the location and survey information for the site.

If you have any questions or concerns, please contact me.

Regards

**Paul Zahra**  
Specialist - Environmental Approvals & Delivery  
Assets Planning and Delivery  
John Tonkin Water Centre  
629 Newcastle Street, Leederville WA 6007

■ [REDACTED]  
■ [REDACTED]



## Appendix 5: DBCA Letter - Confirmation of Neergabby Site as Conservation Estate

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/188535463>



Department of Biodiversity,  
Conservation and Attractions



*Kristina Itošic*

*We're working for  
Western Australia.*

Our ref: 2022/001739

Enquiries: John Stevenson

Phone: [REDACTED]

Email: [REDACTED]

Chief Financial Officer  
Water Corporation  
John Tonkin Water Centre  
629 Newcastle Street  
Leederville WA 6007

Dear Mr Page

#### **Confirmation of Prior Acceptance of Offset Sites for Management as Conservation Estate**

I refer to the previous discussions between the Department of Biodiversity, Conservation and Attractions (DBCA) and the Water Corporation in respect of the Corporation's requirement for environmental offset properties associated with the State and Commonwealth environmental assessment processes for the proposed Alkimos Seawater Desalination Plant and Pipeline project (EPA Assessment No. 2210 & EPBC 2019/8453).

To assist the Water Corporation in formulating an offset strategy for this project, I confirm that the DBCA is agreeable to making the below listed properties available to the Water Corporation for such purposes.

1. Lot M1934 Gingin Brook Road Neergabby 6503  
(Lot M1934 on Diagram 12689 CT:1093/257)
2. Lot 201 Gingin Brook Road Neergabby 6503  
(Lot 201 on Deposited Plan 424224 CT: 4035/229)

I confirm that the DBCA has already endorsed and internally approved the above two freehold properties for addition to the State of WA Conservation Estate and or the Comprehensive, Adequate and Representative (CAR) Reserve System. The properties are currently held in the name of the State of WA in freehold title and are in the administrative process of conversion to Reserve status under DBCA management into perpetuity.

The properties were recently acquired by the DBCA for the purposes of utilization by third party proponents for future environmental offset needs. I confirm that neither property has been previously allocated to another offset proponent nor project.

The properties are to be made available to the Water Corporation on the basis that the Corporation will reimburse the DBCA for the full acquisition costs, the full costs incurred by the DBCA from third party suppliers utilized in the acquisition process and the DBCA internal project management costs associated with the acquisition processes. DBCA Invoices for all such costs have already been forwarded to the Water Corporation.

The Water Corporation will need to satisfy itself in respect of its own due diligence investigations for each property.

As a DBCA condition of this property allocation, the Water Corporation will be required to enter into negotiations and agreement with the DBCA in respect of the Establish and Ongoing Land Management Budget for each site. The budget term is envisaged to be 20 years, unless otherwise agreed by the approving authorities. The DBCA envisages the agreement and execution of a Memorandum of Understanding (MOU) between the DBCA and Water Corporation to give effect to this allocation condition.

Any proposed rehabilitation / revegetation works undertaken by the Water Corporation will be done so on the basis that the Water Corporation bears the full cost and liability of such activities. The DBCA broadly consents to allowing the Water Corporation and or its specialist consultants / contractors reasonable access to the rehabilitation site to undertake works. Disturbance of the remaining portions of DBCA managed lands shall be minimized by the Water Corporation.

However, the DBCA will not provide an assessment of whether the properties satisfy the Water Corporation's offset responsibilities and acknowledge that any such assessment will be determined independently by the State Department of Water and Environmental Regulation (DWER) under the provisions of the *Environmental Protection Act 1986* (the EPA Act) and the Commonwealth Department of Climate Change, Energy, the Environment and Water (DCCEEW) under the provisions of the *Environmental Protection and Biodiversity Conservation Act 1999* (the EPBC Act).

Should you require any additional assistance in this matter, please contact DBCA's Senior Land Acquisition Officer, Mr John Stevenson via email at [REDACTED]

Yours Sincerely



**Ms Nicola Mincham**  
Land Services Coordinator  
Land Services Unit  
Aboriginal Engagement, Planning and Lands Branch

23 April 2024

## Appendix 6: Notification of Commencement of the Action

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/189812785>

**From:** [Sean Nicholson](#)  
**To:** [EPBC Monitoring](#)  
**Cc:** [Post Approval](#); [Aaron Thorburn](#); [Paul Zahra](#)  
**Subject:** EPBC 2019/8453 - Alkimos DSP - Notification of Date of Commencement of the Action  
**Date:** Monday, 27 November 2023 3:13:00 PM

---

Good afternoon,

In accordance with condition 26 of the EPBC Act Approval for Alkimos Desalination Plant, Alkimos WA (EPBC ref 2019/8453). Water Corporation is pleased to notify the Department that the action commenced on 20 November 2023, with native vegetation clearing of the plant footprint commencing on that date.

**NOTIFICATION OF DATE OF COMMENCEMENT OF THE ACTION**

26) The approval holder must notify the **department** electronically of the date of **commencement of the Action**, within 20 **business days** following **commencement of the Action**.

If you have any questions, please don't hesitate to contact me.

Kind regards,

**Sean Nicholson**  
Specialist – Environment  
Assets Planning and Delivery  
Water Corporation

█ [REDACTED]  
█ [REDACTED]  
█ [REDACTED]

[REDACTED]



[watercorporation.com.au](http://watercorporation.com.au)

[REDACTED]

Water Corporation acknowledges the Traditional Owners throughout Western Australia and their continuing connection to the land, water and community. We pay our respects to all members of the Aboriginal communities and their cultures and to Elders past, present and emerging.

## Appendix 7: DCCEEW Request for Compliance Records – Water Corporation Response

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/189829162>

**From:** [Audit](#)  
**To:** [Sean Nicholson](#)  
**Cc:** [Helen HODGKINS](#); [Paul Zahra](#); [Karen KHOO \(Guest\)](#)  
**Subject:** RE: EPBC 2019/8453 - audit follow up items & records [SEC=OFFICIAL]  
**Date:** Thursday, 19 September 2024 2:55:03 PM  
**Attachments:** [image001.jpg](#)

---

**Caution:** This email originated from outside the organisation. If you are unsure on the legitimacy of this email do not click on any links or download attachments.

[SEC=OFFICIAL]

Thank you Sean, acknowledging receipt of the map.

Kind regards,

**Karen Khoo**  
**Senior Auditor**

Environmental Audit Section | Compliance and Enforcement Branch | Environmental  
Permitting and Compliance Division  
Ngunnawal Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090, ACT 2601

[REDACTED]  
[REDACTED]

DCCEEW.gov.au ABN 63 573 932 849



---

**From:** Sean Nicholson [REDACTED]  
**Sent:** Thursday, September 19, 2024 4:07 PM  
**To:** Audit [REDACTED]  
**Cc:** Helen HODGKINS [REDACTED] Paul Zahra  
[REDACTED] Karen KHOO [REDACTED]  
[REDACTED]  
**Subject:** RE: EPBC 2019/8453 - audit follow up items & records [SEC=OFFICIAL]

Hi Karen,

Please see attached map showing areas cleared to date within the DE.

Kind regards,

**Sean Nicholson**  
Environment Specialist  
Water Corporation

■ [REDACTED]  
■ [REDACTED]

---

**From:** Audit <[Audit@dcceew.gov.au](mailto:Audit@dcceew.gov.au)>

**Sent:** Thursday, September 19, 2024 10:38 AM

**To:** Sean Nicholson [REDACTED]

**Cc:** Helen HODGKINS [REDACTED] Paul Zahra

[REDACTED] Karen KHOO (Guest) [REDACTED]

**Subject:** RE: EPBC 2019/8453 - audit follow up items & records [SEC=OFFICIAL]

[SEC=OFFICIAL]

Hi Sean,

Thank you and the team for your time last week to facilitate the audit and for sending through the requested documents. Could you also send through a map showing the areas that have been cleared in relation to the approval boundary?

Kind regards,

**Karen Khoo**  
Senior Auditor

Environmental Audit Section | Compliance and Enforcement Branch | Environmental Permitting and Compliance Division  
Ngunnawal Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090, ACT 2601

[REDACTED]  
[REDACTED]

DCCEEW.gov.au ABN 63 573 932 849



---

**From:** Sean Nicholson [REDACTED]  
**Sent:** Thursday, September 12, 2024 1:20 PM  
**To:** Audit [REDACTED]  
**Cc:** Helen HODGKINS [REDACTED] Conor DWYER  
[REDACTED] Karen KHOO [REDACTED]  
[REDACTED] Paul Zahra [REDACTED]  
**Subject:** RE: EPBC 2019/8453 - audit follow up items & records [SEC=OFFICIAL]

Hi Karen, Helen & Conor,

Thanks again for your time yesterday and patience with the chaotic crib/ meeting room!

As requested, I've attached evidence of the following that was requested during the audit.

Feel free to reach out if you require any further information.

- Letter - DBCA Confirmation of Prior Acceptance of Offset Sites for Management as Conservation Estate
- DCCEEW Comments on Draft Offset Management Plans (includes confirmation of submission date of plans by Water Corporation)
- Screenshot of Melaleuca sp locations along pipeline route
- Clearing tracker screenshot (total area actually cleared is shown in column Q)
- List of attendees below

Attendees

Water Corporation:

Sean Nicholson – Environment Specialist

Paul Zahra – Environment Specialist

Digby Short – Head of Environment

Dehlia Goundrey – Manager Approvals, Regulation and Performance

Ryan Smith – Principal Project Manager

Alkimos Seawater Alliance (ASWA):

Rachel Champion – Environmental Approvals Lead

\*Amy Elkington – Environmental and Sustainability Manager

Tom Forgie - Environmental Advisor

\*Paul Kenny – Senior Supervisor

\* = only present for site inspection

Kind regards,

**Sean Nicholson**  
Environment Specialist  
Water Corporation

■ [REDACTED]  
■ [REDACTED]

---

**From:** Sean Nicholson  
**Sent:** Thursday, August 29, 2024 3:03 PM  
**To:** 'Audit' <[Audit@dcceew.gov.au](mailto:Audit@dcceew.gov.au)>  
**Cc:** Helen HODGKINS [REDACTED] Conor DWYER  
[REDACTED]; Karen KHOO (Guest) [REDACTED]  
**Subject:** RE: EPBC 2019/8453 - intent to audit [SEC=OFFICIAL]

Hi Karen,

Thanks for sending through the scope and agenda. The proposed date and time is suitable from our end.

I'll send through the details site meeting location, PPE requirements etc. next week once it's locked in.

Kind regards,

**Sean Nicholson**  
Environment Specialist

[REDACTED]

■ [REDACTED]  
■ [REDACTED]

---

**From:** Audit <[REDACTED]>  
**Sent:** Thursday, August 29, 2024 9:32 AM  
**To:** Sean Nicholson [REDACTED]  
**Cc:** Helen HODGKINS <[REDACTED]>; Conor DWYER  
[REDACTED] Karen KHOO (Guest) [REDACTED]  
**Subject:** RE: EPBC 2019/8453 - intent to audit [SEC=OFFICIAL]

[SEC=OFFICIAL]

Hi Sean,

Please see attached for the audit scope and a proposed agenda for a site visit on 11 September 2024 from 2pm-4:30pm. Could you let me know if you have any questions/comments or if you foresee any issues facilitating this?

Once we have agreed on the date and times, I will also send through a formal request to seek your consent to visit the site.

Kind regards,

**Karen Khoo**  
**Senior Auditor**

Environmental Audit Section | Compliance and Enforcement Branch | Environmental Permitting and Compliance Division  
Ngunnawal Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090, ACT 2601

[REDACTED]  
[REDACTED]

DCCEEW.gov.au ABN 63 573 932 849



---

**From:** Sean Nicholson [REDACTED]  
**Sent:** Thursday, August 22, 2024 3:16 PM  
**To:** Karen KHOO <[REDACTED]>  
**Cc:** Audit [REDACTED]  
**Subject:** RE: EPBC 2019/8453 - intent to audit [SEC=OFFICIAL]

Hi Karen,

Thanks for sending through the notification.

As soon as you can confirm the dates/ times, audit scope and any other info required beforehand the better. As this will help with us with planning (ensuring the right people are available, organising inductions/ meeting rooms etc.)

Kind regards,

**Sean Nicholson**  
Specialist – Environment  
Water Corporation

■ [REDACTED]  
■ [REDACTED]  
[REDACTED]

---

**From:** Audit <[REDACTED]>  
**Sent:** Wednesday, August 21, 2024 11:35 AM  
**To:** Sean Nicholson <S[REDACTED]>  
**Cc:** Helen HODGKINS <[REDACTED]> Karen KHOO (Guest)  
[REDACTED]  
**Subject:** EPBC 2019/8453 - intent to audit [SEC=OFFICIAL]

[SEC=OFFICIAL]

Hi Sean,

Thank you for your time on the phone just now. Please see attached a letter advising that the EPBC 2019/8453 approval has been selected for audit. I have also attached the conditions of approval and an audit fact sheet for your reference.

As mentioned, I will send through further details next week regarding the scope of the audit and meeting times.

Please don't hesitate to reach out if you have any questions in the meantime.

**Karen Khoo**  
**Senior Auditor**

Environmental Audit Section | Compliance and Enforcement Branch | Environmental  
Permitting and Compliance Division  
Ngunnawal Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090, ACT 2601

[REDACTED]  
[REDACTED]

DCCEEW.gov.au ABN 63 573 932 849



[SEC=OFFICIAL]

----- IMPORTANT - This email and any attachments have been issued by the Commonwealth of Australia (Commonwealth). The material transmitted is for the use of the intended recipient only and may contain confidential, legally privileged, copyright or personal information. You should not copy, use or disclose it without authorisation from the Commonwealth. It is your responsibility to check any attachments for viruses and defects before opening or forwarding them. If you are not an intended recipient, please contact the sender of this email at once by return email and then delete both messages. Unintended recipients must not copy, use, disclose, rely on or publish this email or attachments. The Commonwealth is not liable for any loss or damage resulting from unauthorised use or dissemination of, or any reliance on, this email or attachments. If you have received this e-mail as part of a valid mailing list and no longer want to receive a message such as this one, advise the sender by return e-mail accordingly.

This notice should not be deleted or altered -----

The Water Corporation respects individuals' privacy. Please see our privacy notice at [What about my privacy](#)

This Electronic Mail Message and its attachments are confidential. If you are not the intended recipient, you may not disclose or use the information contained in it. If you have received this Electronic Mail Message in error, please advise the sender immediately by replying to this email and delete the message and any associated attachments. While every care is taken, it is recommended that you scan the attachments for viruses. This message has been scanned for malware by Proofpoint.

[SEC=OFFICIAL]

----- IMPORTANT - This email and any attachments have been issued by the Commonwealth of Australia (Commonwealth). The material transmitted is for the use of the intended recipient only and may contain confidential, legally privileged, copyright or personal information. You should not copy, use or disclose it without authorisation from the Commonwealth. It is your responsibility to check any attachments for viruses and defects before opening or forwarding them. If you are not an intended recipient, please contact the sender of this email at once by return email and then delete both messages. Unintended recipients must not copy, use, disclose, rely on or publish this email or attachments. The Commonwealth is not liable for any loss or damage resulting from unauthorised use or dissemination of, or any reliance on, this email or attachments. If you have received this e-mail as part of a valid mailing list and no longer want to receive a message such as this one, advise the sender by return e-mail accordingly.

This notice should not be deleted or altered -----

[SEC=OFFICIAL]

----- IMPORTANT - This email and any attachments have been issued by the Commonwealth of Australia (Commonwealth). The material transmitted is for the use of the intended recipient only and may contain confidential, legally privileged, copyright or personal information. You should not copy, use or disclose it without authorisation from the Commonwealth. It is your responsibility to check any attachments for viruses and defects before opening or forwarding them. If you are not an intended recipient, please contact the sender of this email at once by return email and then delete both messages. Unintended recipients must not copy, use, disclose, rely on or publish this email or attachments. The Commonwealth is not liable for any loss or damage resulting from unauthorised use or dissemination of, or any reliance on, this email or attachments. If you have received this e-mail as part of a valid mailing list and no longer want to receive a message such as this one, advise the sender by return e-mail accordingly.

This notice should not be deleted or altered -----

[SEC=OFFICIAL]

## Appendix 8: Shapefile of Clearing of Protected Matters 2023-2024

<https://nexus.watercorporation.com.au/otcs/cs.exe/link/189826666>



EPBC2019\_8453\_Clearing\_of\_ProtectedMatters\_2023\_2024.zip