

**Department of Defence  
Annual Environmental Compliance Report 2018**

**EPBC Act Approval 2010/5316  
Cultana Expansion Area Project, near Whyalla, South Australia**

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## Document Version Control

Version	Date	Approved by	Details / Reason for Change
1	06/01/2017	Tim McKay	First Annual Compliance Report
2	08/01/2018	Tim McKay	Annual Report for 2018

## 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



**Full name (please print)**

Tim McKay

**Position (please print)**

Acting Director  
Defence Environment Protection and  
Assessment

**Organisation (please print including  
ABN/ACN if applicable)**

Department of Defence  
ABN 68706814312

**Date**

8 January 2018

# 1. Summary

The Cultana Expansion Area (CEA) project comprises the expansion of the existing Cultana Training Area in South Australia westwards, from 50 250 hectares to approximately 209 294 hectares through the acquisition of pastoral leases. The Department of Defence submitted the project for assessment under the (Cwlth) *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) on 23 December 2009 (EPBC referral number: 2010/5316).

The project was deemed to be a controlled action under the EPBC Act and was subject to a Public Environment Report environmental assessment process. The relevant EPBC Act controlling provisions were:

- Listed threatened species and communities (sections 18 & 18A); and
- Commonwealth action (section 28).

The action was approved subject to a number of conditions by the (now) Department of the Environment and Energy (DoEE) on 5 December 2013. Condition 18 of the approval requires the preparation and submission of an annual compliance report within three months of every 12 month anniversary of the *commencement of the action*. The action commenced on 9 October 2015, so annual compliance reports are due no later than 9 January of each year.

## 2. Description of activities

The project involved the expansion of Defence's existing Cultana Training Area (CTA) located near Whyalla in South Australia. The expansion (known as the Cultana Expansion Area (CEA) project) increases the total area of CTA from 50 250 hectares to approximately 209 294 hectares through the acquisition of pastoral leases and the subsequent grant by the South Australian Government of a Miscellaneous Lease for Defence Purposes (MLDP). The CTA plays a vital role in supporting Australian Defence Force (ADF) training for deployment to the Middle East.

The expansion of the CTA will allow fulfilment of the following objectives:

- employment of a wide range of Army and RAAF individual or vehicle mounted weapons systems and platforms;
- development of a combined arms training area of sufficient size to allow Army and RAAF to train together;
- development of an all-weather training area of sufficient size that is easily accessible by both Darwin and Adelaide Army units and can be used during the northern wet season, during which the Northern Territory training areas are closed;
- development of a training area to support the Army's force generation cycle and foundation warfighting requirements;
- individual and collective training that underpins operational capability;
- development of a training area of sufficient size to allow training activities to be rotated, and areas of land rested to facilitate sustainable use of the training area; and

- development of a training area sufficiently close to a fully equipped hospital to allow personnel to be evacuated to it within one hour of a medical emergency occurring.

Since the project's environmental approval, use of the CEA has evolved to include a range of military training and activities involving Defence's current inventory of vehicles, equipment and weapon systems. The expanded CTA is expected to contribute to Defence's training needs for the next seventy-five (75) to one hundred (100) years.

### **3. Conditions of approval**

The EPBC Act conditions of approval relevant to the expansion of CTA and environmental management of the CEA have been incorporated into the CTA Environmental Management System, Environmental Framework, Environmental Management Plans and environmental management program for the site, and have been consistently applied since project approval.

Condition 18 of EPBC Act approval requires the publication of an annual compliance report within three months of every 12 month anniversary of the *commencement of the action*. The action commenced on 9 October 2015 so the annual compliance reports are due by 9 January each year.

## 4. Compliance Table

Table 1 – Compliance Table

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
1.	<b>Prohibited activities</b> No chemical, biological, radioactive or nuclear weapons may be taken onto or used within the boundaries of <i>the CEA</i> .	Compliant	Chemical, biological, radioactive or nuclear (CBRN) weapons are not approved for use on Defence training areas. Range Standing Orders contain provisions that prohibit CBRN activities being taken onto or used within the boundaries of the Cultana Expansion Area (CEA).
2.	<b>Stakeholder Engagement</b> The approval holder must establish and maintain an environmental advisory committee (EAC) for the duration of the approval to facilitate input from relevant stakeholders into environmental management of <i>the CEA</i> . The EAC must be established within twelve (12) months of this approval and meet at least every twelve (12) months thereafter.	Compliant	Defence commenced forming the EAC in early 2014. Stakeholders including local councils, traditional owner groups, neighbours, State government agencies and the University of Adelaide were invited to nominate representatives for the EAC.  A Miscellaneous Lease for Defence Purposes (MLDP) with the South Australian government was signed on 20 June 2014 following which the membership of the EAC was finalised.  The inaugural meeting of the EAC was held on 18 June 2015. The EAC met on 15 March and 8 November in 2017. Both meetings were held at the Cultana Range Safety Office.
3.	The approval holder must establish, maintain and advertise protocols for receiving, managing and resolving complaints in a timely and transparent manner. The protocols must be established prior to <i>commencement</i> of the action.	Compliant	Contact details for the CEA project are provided on a dedicated website: <a href="http://www.defence.gov.au/id/cultana/Environmental.asp">http://www.defence.gov.au/id/cultana/Environmental.asp</a>  Any complaint received by Defence is recorded on Defence Environmental Incident Reporting and Management System (Webform AE444) and identifies the response action/s taken.  Community awareness of activities at the CEA is promoted through Defence media releases and public notifications via local media, the Defence website and a Cutlana Training Area Facebook page.
4.	<b>Environmental Management Framework</b>	Compliant	An Environmental Management System (EMS), consistent with

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	<p>The approval holder must establish and implement an environmental management system (EMS) for <i>the CEA</i>, consistent with <i>ISO14001</i>. The EMS must include an overarching document that:</p> <p>a) describes the interaction between elements of the EMS including the <i>Defence Environmental Management Framework</i>, and specific plans relevant to <i>the CEA</i> as well as other elements of <i>the CEA environmental management framework</i>;</p> <p>b) identifies roles and responsibilities for implementation of the elements of the EMS; and</p> <p>c) describes arrangements for ongoing review (and revision as necessary) of elements of the EMS.</p> <p><b>Note:</b> <i>The Department</i> understands that Defence may wish to amalgamate EMS documents relating to several individual sites. This condition would not preclude that approach, provided that commitments made in relation to <i>the CEA</i> are clearly identifiable, and that the conditions of approval are satisfied in full.</p>		<p><i>ISO14001</i> was prepared and implemented for the CEA detailing the interaction between the Defence Environmental Management Framework and specific environmental plans relevant to the CEA, including other elements of the CEA environmental management framework.</p> <p>The CEA EMS is the Defence Garrison and Estate Management System (GEMS) storage of data that helps drive on ground environmental management. It adopts a single, integrated, plan document that combines overarching management actions with matter-specific actions. The EMS identifies roles and responsibilities for elements of the EMS and details arrangements for the ongoing review (and if necessary, revisions) of elements of the EMS.</p> <p>The EMP provides one consolidated Environmental management plan for Cultana that fulfills the MLDP conditions and EPBC approval requirements. The EMP will help monitor impacts and the variations associated with the change from pastoral to Defence use.</p> <p>The EMS and EMP were prepared in close consultation with the South Australian Minister for Environment's nominated representatives at the South Australian Arid Lands Natural Resource Management Board. A draft EMS and management plan was submitted to the South Australian Minister in June 2015 and a series of three workshops and two on-site field investigations were undertaken with the South Australian government to refine the plan documents.</p> <p>The EMP and EMS were endorsed by the South Australian government in February 2016.</p>

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
			In addition to the intergovernmental cooperation in developing the plans, there was community consultation through the Cultana Environmental Advisory Committee (EAC). The EMS and EMP were distributed to all members of the EAC in March 2016, including local councils, aboriginal groups and community representatives.
5.	<p>The approval holder must prepare and implement <b>operational controls</b> that reduce environmental impacts and maintain public amenity and safety. <b>The operational controls</b> must address at least the following public amenity matters:</p> <ul style="list-style-type: none"> <li>a) firing of projectiles from, into or within <b>the CEA</b> over any public road or railway or any other area occupied by civilians;</li> <li>b) noise, noting that training activities may occur at night;</li> <li>c) transport of equipment and personnel to, from and within <b>the CEA</b>;</li> <li>d) dust and smoke;</li> <li>e) electro-magnetic frequency interference (including electronic warfare activities); and</li> <li>f) light spill (including laser technologies).</li> </ul> <p>Specific <b>operational controls</b> must be made available to the <b>Department</b> upon request. The approval holder must, upon request, demonstrate to <b>the Minister</b> that the</p>	Compliant	<p>Operational controls to reduce environmental impacts and maintain public amenity and safety to address public amenity matters include the Defence Environmental Clearance Certificate (ECC) process (compliance controls), Range Standing Orders when and where relevant to particular matters, safety templates and roads, perimeter fencing, firebreak and warning signage, emergency service contacts, local media, Defence webpages, community engagement/information opportunities. In particular:</p> <ul style="list-style-type: none"> <li>a) Range Standing Orders cover firing procedures, permitted areas for firing and prohibited firing areas.</li> <li>b) The CEA Environmental Management Plan (EMP) addresses noise problems by implementing buffers between the noise source and sensitive receptors such as residences. Buffers can be reduced or increased in accordance with the equipment being fired.</li> <li>c) Vehicle road movements and crossings are undertaken at the quietest times with the least amount of public traffic e.g. after midnight/on weekends, etc. SA Department of Planning, Transport and Infrastructure and SA Police traffic management are engaged as required and police, signs and traffic management are also put in place if needed.</li> <li>d) Dust is managed via a combination of a 1km vehicle movement buffer along roadsides and boundaries. Time lapse cameras are used to monitor dust and if required wetting and binding applications utilised. Dust management is also adaptive according</li> </ul>



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	<i>operational controls</i> provide for public safety from these matters.		<p>to climatic conditions. If strong winds are likely to send dust clouds towards a road then the buffer size can be increased or training moved to another location.</p> <p>e) The use of electro-magnetic frequencies (EMF) by Defence is managed by the Defence Spectrum Office (DSO) in accordance with relevant legislation and codes. The key Defence policies are <i>DI(G) CIS 6-6-001 Management of Defence use of the Radiofrequency Spectrum</i> (2011) and <i>ADFP 6.0.4 Electromagnetic Spectrum Management</i> (2014).</p> <p>f) The use of laser equipment by Defence comes under the control of the Vice Chief of the Defence Force. The key Defence policy is the <i>Defence Radiation Safety Manual</i> (2013).</p>
6.	<p><b>Management plans</b></p> <p>The approval holder must, within twelve (12) months of the <i>commencement</i> of the action, provide <i>the Minister with</i> a threatened species habitat management plan (TSHMP), prepared by a <i>suitably qualified expert</i>. The TSHMP must identify specific areas of important habitat and / or known occurrence of <i>threatened species</i> within <i>the CEA</i> and describe how those areas will be managed for the protection of those species. The TSHMP must make reference to any relevant conservation advices or recovery plans approved under <i>the EPBC Act</i>.</p> <p>Once approved, by <i>the Minister</i> the TSHMP must be implemented. Any work undertaken prior to <i>the Minister 's</i> approval of the TSHMP must be preceded by a pre-activity</p>	Compliant	<p>A Threatened Species Habitat Management Plan (TSHMP) for the CEA is included in Section 3 of the EMP provided to DoEE on 7 October 2016. The plan is currently being considered.</p> <p>All relevant work that has being undertaken prior to the Minister's approval of the TSHMP has been preceded by a survey for threatened species as required by the condition.</p>

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	<p>survey for all <i>threatened species</i> and, if any are detected, relevant work may not proceed until the TSHMP is approved.</p> <p>At least once every ten (10) years, the TSHMP must be reviewed and updated as required in consideration of all available sustainability monitoring reports (refer Condition 12), and provided to <i>the Minister</i> for approval. The revised TSHMP must not be implemented until it has been approved by <i>the Minister</i>.</p> <p>Note: This condition may be satisfied by a single document, or separate documents dealing with individual species or groups of species.</p>		Not triggered yet.

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
7.	<p>The approval holder must, within twelve (12) months of the <i>commencement</i> (of the action, provide <i>the Minister with</i> a biosecurity and overabundant native species management plan (BONSMP), <i>prepared by a suitably qualified expert</i>. The BONSMP must describe measures to monitor and control animal pests, weeds and pathogens, including but not limited to the following species, within <i>the CEA</i>:</p> <ul style="list-style-type: none"> <li>• Feral Cat (<i>Felis catus</i>)</li> <li>• Red Fox (<i>Vulpes vulpes</i>)</li> <li>• Feral Goat (<i>Capra hircus</i>)</li> <li>• Rabbit (<i>Oryctolagus cuniculus</i>)</li> <li>• rodents (<i>non-native Mus and Rattus spp.</i>)</li> <li>• tramp ants</li> <li>• Buffel Grass (<i>Cenchrus ciliaris</i>)</li> <li>• Carrion Flower (<i>Orbea variegata</i>)</li> </ul> <p>The BONSMP must make reference to any relevant threat abatement plans approved under <i>the EPBC Act</i>.</p> <p>Once approved, by <i>the Minister</i>, the BONSMP must be implemented. Any work undertaken prior to <i>the Minister's</i> approval of the BONSMP, must have clear and effective protocols in place to monitor and control animal pests, weeds and pathogens. These protocols must be provided to <i>the Minister</i> upon request.</p>	Compliant	<p>A Biosecurity and Overabundant Native Species Management Plan (BONSMP) is included in Section 4 of the EMP provided to DoEE on 7 October 2016. The plan is currently being considered.</p> <p>All relevant work that has being undertaken prior to the Minister's approval of the BONSMP has had appropriate protocols in place to monitor and control animal pests, weeds and pathogens as required by the condition.</p>

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
8.	<p>The approval holder must, within twelve (12) months of the <b>commencement</b> of the action, provide <b>the Minister with</b> a pollution prevention and contamination management plan (PPCMP), prepared by a <b>suitably qualified expert</b>. The PPCMP must address at least the following matters in relation to <b>the CEA</b>:</p> <ul style="list-style-type: none"> <li>a) identification of, and management prescriptions for, existing contamination by waste fuels and other hazardous and toxic substances.</li> <li>b) protocols for the safe storage, handling, use, transport and disposal of fuels and other anticipated hazardous and toxic substances;</li> <li>c) measures for monitoring contamination against known baselines, making reference to any applicable Australian standards; and</li> <li>d) contingency measures for reporting, containing and remediating spills and other accidental pollution events.</li> </ul> <p>Once approved by <b>the Minister</b>, the PPCMP must be implemented. Any work undertaken Prior to <b>the Minister's</b> approval of the PPCMP, must have clear and effective protocols in place to prevent pollution and manage contamination consistent with the requirements of 8a) to 8d) above. These protocols must be provided to <b>the Minister</b></p>	Compliant	<p>A Pollution Prevention and Contamination Management Plan (PPCMP) is included in Section 6 of the EMP provided to DoEE on 7 October 2016. The plan is currently being considered.</p> <p>All relevant work that has being undertaken prior to the Minister's approval of the BONSMP has had appropriate protocols in place to prevent pollution and manage contamination as required by the condition.</p>

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	upon request.  Material described in 8a) above must be provided to <i>the Minister within</i> twenty-four (24) months of <i>commencement</i> of the action.		
9.	<p>Within six (6) months of <i>commencement</i> of the action, the approval holder must provide evidence to <i>the Department</i> that the following organisations have been consulted in relation to transport management, and that any concerns raised have been addressed, through <i>the CEA environmental management framework</i>:</p> <ul style="list-style-type: none"> <li>• Civil Aviation Safety Authority, in relation to airspace management;</li> <li>• South Australian Department of Planning, Transport and Infrastructure;</li> <li>• Port Augusta City Council, in relation to local road traffic;</li> <li>• Whyalla City Council, in relation to local road traffic; and</li> <li>• Royal Flying Doctor Service, in relation to their operational needs.</li> </ul> <p><b>Note:</b> <i>The Department</i> acknowledges that in some cases consultation may already have occurred.</p>	Compliant	The Public Environment Report explained that consultation with the organisations had already taken place. Liaison with the organisations now occurs as and when necessary, noting that representatives of Port Augusta and Whyalla City councils now participate in the Environmental Advisory Committee.
10.	<p><b>Environmental planning framework</b></p> <p>Construction and training activities may only be undertaken in accordance with the</p>	Compliant	Defence has applied the environmental assessment processes described in the PER to all construction and training activities that have so far taken place at the CEA. Examples of activities include

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	<p>Defence environmental assessment process as described in <i>the PER</i> and with reference to <i>the CEA environmental management framework</i>. If an environmental assessment identifies any residual impacts on matters protected under <i>the EPBC Act</i>, the approval holder must provide to <i>the Minister</i> for approval:</p> <ul style="list-style-type: none"> <li>• a report of the environmental assessment in question including a copy of Defence's environmental assessment;</li> <li>• the corresponding construction environmental management plan (CEMP) if one has been prepared; and</li> <li>• an evaluation, with reference to <i>the EPBC Act offset policy</i>, of whether any offset (compensation) is required.</li> </ul> <p>Where an offset is required, the approval holder must prepare an environmental offset strategy (EOS) in accordance with <i>the EPBC Act offsets policy</i> and in consultation with the relevant agencies within the South Australian Government.</p> <p>The construction or training activity must not commence until <i>the Minister</i> has approved it on the basis of any environmental assessment, CEMP or EOS provided, and imposed any additional environmental protection measures that are deemed</p>		<p>installation of perimeter fencing and signage, demolition of redundant structures, remediation of minor contamination and the conduct of military training activities.</p> <p>In each case, no residual impacts on matters protected under the EPBC Act have been identified.</p>

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	necessary. Such plans and measures must be implemented as approved.		
11.	<p><b>Monitoring and reporting</b></p> <p>The approval holder must engage <i>a suitably qualified expert</i> to prepare an environmental baseline condition report (EBCR). The EBCR must describe the condition of the environment at <i>the CEA</i> at the <i>commencement</i> of the action at least in the following terms:</p> <p>a) comprehensive ground-truthed mapping of vegetation communities, using a relevant regional or state-wide vegetation classification system;</p> <p>b) descriptions of all vegetation communities occurring within <i>the CEA</i>, including information on key species, conservation status, soil, geographic and climatic preferences, relevant threats and general condition;</p> <p>c) comprehensive ground-truthed mapping of environmentally sensitive features including claypans, contaminated sites and highly erodible or saline soils;</p> <p>d) comprehensive ground-truthed mapping of waterbodies and watercourses (including floodplains) within <i>the CEA</i>;</p> <p>e) comprehensive mapping (unless culturally inappropriate) of culturally significant sites and areas, based on local, state and Commonwealth heritage databases as well as</p>	Compliant	A copy of the Environmental Baseline Condition Report (EBCR) was provided to DoEE on 7 October 2016.

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	<p>consultation with relevant traditional owners;</p> <p>f) identification of all weeds and pests identified on the site, and mapping of the distribution of prescribed / listed and major pest and weed populations;</p> <p>g) an inventory of all species known to occur within <i>the CEA</i>; and</p> <p>h) descriptions, justifications and limitations (e.g. due to climatic conditions) of survey methodology employed.</p> <p>The EBCR must be provided to <i>the Minister within</i> twenty-four (24) months of the complete acquisition of <i>the CEA</i>. No native vegetation may be cleared without having been surveyed.</p>		
12.	<p>The approval holder must, within twelve (12) months of the <i>commencement</i> of the action, provide <i>the Minister</i> with a <i>sustainability monitoring and reporting plan (SMRP)</i> for <i>the CEA</i>. The SMRP must be prepared with reference to the EBCR (see Condition 11) and must include:</p> <p>a) clearly defined <i>thresholds and indicators</i> including occurrence, extent, abundance and condition for the following parameters:</p> <p>i) soil;</p> <p>ii) water;</p>	Compliant	<p>A SMRP is included in Section 10 of the EMP provided to DoEE on 7 October 2016. The plan is currently being considered.</p> <p>All relevant work that has being undertaken prior to the Minister's approval of the SMRP has had appropriate protocols in place to monitor the parameters required by the condition.</p>



Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	<p>iii) air;</p> <p>iv) noise;</p> <p>v) <i>threatened species</i></p> <p>vi) animal pests, weeds and pathogens; and</p> <p>vii) indigenous and non-indigenous heritage;</p> <p>b) establishment of a representative network of longitudinal reference sites;</p> <p>c) establishment of a periodic vegetation remapping regime (at least every ten (10) years);</p> <p>d) a clearly articulated 'rest and rotation' policy for the protection of areas potentially damaged by overuse; .</p> <p>e) descriptions and justifications of survey methodology to be employed;</p> <p>f) a recovery planning process linked to the <b>thresholds and indicators</b> defined in 12 a) above; and</p> <p>g) a requirement for the preparation of annual sustainability monitoring reports on implementation of the SMRP (including any management responses undertaken or intended).</p> <p>Once approved by <i>the Minister</i>, the SMRP must be implemented. Any work undertaken prior to <i>the Minister's</i> approval of the SMRP must have clear and effective protocols in</p>		

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	place to monitor the parameters in 12a) above and this information must be included in any reporting on the SMRP.		
13.	Sustainability monitoring reports must be provided to <b>the Minister</b> annually within ten (10) business days of their finalisation, and must be permanently published at a suitable location on the internet within one (1) month of their finalisation.	Compliant	Not triggered yet. The SMRP is currently awaiting approval from DoEE.
14.	<p><b>Miscellaneous environmental management</b></p> <p>Prior to any <b>commencement</b> of the action, the approval holder must provide <b>the Department</b> with a copy of <b>the CEA lease agreement</b></p> <p><b>Note:</b> The conditions of approval have been prepared in consideration of a draft of the agreement described above.</p> <p>Substantial deviations from this draft may result in variations to the conditions of approval under Section 143 of <b>the EPBC Act</b>.</p>	Compliant	A copy of the signed Miscellaneous Lease for Defence Purposes (MLDP) was provided to DoEE on 30 July 2014, prior to commencement of the action.
15.	<p>The following environmental themes must be managed in accordance with <b>the CEA lease Agreement</b>:</p> <ul style="list-style-type: none"> <li>• flora and fauna (except for <b>threatened species</b> as defined for the purposes of these conditions);</li> <li>• bushfire;</li> <li>• water conservation;</li> </ul>	Compliant	Defence's Environmental Management System and Environmental Management Plan for the CEA address these matters and were endorsed by the South Australian government in February 2016.

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	<ul style="list-style-type: none"> <li>• noise and vibration;</li> <li>• air and water pollution; and</li> <li>• decommissioning and closure.</li> </ul> <p>Any documents required in accordance with <i>the CEA lease agreement</i> must be provided to the Department upon request.</p>		
16.	<p><b>Administrative conditions</b></p> <p>Within fourteen (14) days after the <i>commencement</i> of the action, the approval holder must advise <i>the Department</i> in writing of the actual date of <i>commencement</i>'</p>	Compliant	Actions involving the demolition of redundant structures commenced on 9 October 2016. Defence notified DoEE on 3 November 2016.
17.	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement all <i>management documents</i> required by this approval, and make them available upon request to <i>the Department</i> . Such records may be subject to audit by <i>the Department</i> or an independent auditor in accordance with section 458 of <i>the EPBC Act</i> , or used to verify compliance with the conditions of approval. Summaries of audits will be posted on <i>the Department's</i> website. The results of audits may also be publicised through the general media.	Compliant	Records are maintained in accordance with current Defence record keeping policies.
18.	Within three months of every 12 month anniversary of the <i>commencement</i> of the action, the approval holder must publish a report on their website addressing	Compliant	Defence submitted the first Annual Environmental Compliance Report for the Cultana Expansion Area Project to DoEE in January 2017. The report was published on 9 January 2017 on the following Defence website.

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	<p>compliance with each of the conditions of approval, including implementation to any <b>management documents</b> as specified in the conditions of approval. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of approval must be provided to <b>the Department</b> at the same time as the compliance report is Published.</p> <p><b>Note:</b> To facilitate administration, this requirement may be addressed concurrently with the annual sustainability monitoring reporting process described in Conditions 12 and 13.</p>		<p><a href="http://www.defence.gov.au/id">http://www.defence.gov.au/id</a></p> <p>A letter from DoEE dated 23 February 2017 advised that the report satisfied the requirements of the EPBC approval.</p> <p>This report is the second Annual Environmental Compliance Report and has been submitted to DoEE and published on the same Defence website within the requisite timeframes.</p>
19.	<p>Upon the direction of <b>the Minister</b>, the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to <b>the Minister</b>. The independent auditor must be approved by <b>the Minister</b> prior to the commencement of the audit. Audit criteria must be agreed to by <b>the Minister</b> and the audit report must address the criteria to the satisfaction of <b>the Minister</b>.</p>	Compliant	Not triggered yet.
20.	<p>If the approval holder wishes to carry out any activity otherwise than in accordance with a <b>management document</b> specified in the conditions of approval, the approval holder must submit to <b>the Department</b> for <b>the Minister's</b> written approval a revised version of that <b>management document</b>. The varied activity shall not commence until <b>the Minister</b> has approved the varied <b>management</b></p>	Compliant	Not triggered yet.

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	<i>document</i> in writing. <i>The Minister</i> will not approve a varied management document unless the revised <i>management document</i> would result in an equivalent or improved environmental outcome over time. If <i>the Minister</i> approves the revised <i>management document</i> , that <i>management document</i> must be implemented in place of the <i>management document</i> originally approved.		
21.	If <i>the Minister</i> believes that it is necessary or convenient for the better protection of the environment to do so, <i>the Minister</i> may request that the approval holder make specified revisions to <i>management documents</i> specified in the conditions of approval and submit the revised management documents for <i>the Minister's</i> written approval. The approval holder must comply with any such request. The revised approved management documents must be implemented. Unless <i>the Minister</i> has approved the revised <i>management document</i> , then the approval holder must continue to implement the <i>management document</i> originally approved, as specified in the conditions of approval.	Compliant	Not triggered yet.
22.	If, at any time after five (5) years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not substantially commence the action without the written	Compliant	The project was commenced on 9 October 2016.

Condition Number	Condition	Is the project compliant with this condition?	Evidence / comments
	agreement of <i>the Minister</i> .		
23.	Unless otherwise agreed to in writing by <i>the Minister</i> , the approval holder must publish all <i>management documents</i> referred to in the conditions of approval on their website. Each <i>management document</i> must be published on the website within one (1) month of being approved.	Compliant	Not triggered yet.