

**RAAF BASE AMBERLEY
INDEPENDENT COMPLIANCE
AUDIT**

EPBC Approval 2008/4410

FINAL

January 2016

RAAF BASE AMBERLEY INDEPENDENT COMPLIANCE AUDIT

EPBC Approval 2008/4410

FINAL

Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Spotless

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Report No. 3657/R01/V2
Date: January 2016



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1.0 Introduction

On behalf of the Department of Defence (Defence) the Royal Australian Air Force operate RAAF Base Amberley, located on the outskirts of Ipswich, approximately 40 kilometres south west of Brisbane, Queensland. Among many other units, RAAF Base Amberley is home to 24 F/A-18F Super Hornets, providing Australia with air combat capability. The F/A-18F Super Hornets operate in accordance with an approval under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). Approval 2008/4410 was granted on 23 March 2010 and has since been varied on 30 January 2012 and 23 April 2014. The Air Force are responsible for the implementation and management of the conditions associated with the Super Hornet.

EPBC Approval 2008/4410 variation dated 23 April 2014 contains conditions 1 to 9. Umwelt (Australia) Pty Limited (Umwelt) was engaged by Spotless Facility Services Pty Limited (Spotless) on behalf of Defence to complete an audit of conditions 4 to 9 of EPBC Approval 2008/4410. Conditions 1 to 3 relate to noise management and do not form part of the Umwelt scope of works. We understand that the audit of the Conditions of Approval relating to noise management was undertaken by the Aircraft Noise Ombudsman (ANO). Conditions 4 to 9, primarily relate to air quality monitoring.

To demonstrate how Defence would meet the requirements of Condition 4 of the Environment Minister's approval of the Super Hornet Operations at RAAF Amberley, Defence commissioned AECOM to prepare an Air Quality Monitoring Plan (AQMP). This plan demonstrated how Defence would meet the requirements specified in the EPBC Approval 2008/4410 and was approved by the Department of the Environment in correspondence dated 29 April 2014 (Ref:2012/07926). AECOM were subsequently commissioned by Spotless to operate an ambient air quality monitoring station to measure the parameters specified in the AQMP on behalf of Defence.

This Audit of Compliance was commissioned to satisfy the requirements of Condition 5 of EPBC Approval 2008/4410, as varied on 23 April 2014, as follows:

Condition 5

The person taking the action must ensure that an Independent Audit of Compliance with the Conditions of Approval, including implementation of the requirements of approved plans, is conducted for each of the following periods:

Period 1: from the date of the approval to 31 December 2014

From 1 January 2015 to 31 December 2018

Each auditor's report must be submitted to the Minister within 6 months of the end of the period to which the report applies. Each auditor's report must be published on the web site of the person taking the action within 3 months of the report being submitted to the Minister.

The independent auditor must be approved prior to the commencement of each audit.

Condition 4 requires the implementation of the Air Quality Monitoring Plan and therefore the audit also included an assessment of compliance with the implementation of all aspects of the Air Quality Monitoring Plan.

2.0 Audit Methodology

The methodology for the audit is illustrated in Figure 2.1 below and discussed further in **Sections 2.1 to 2.12.**

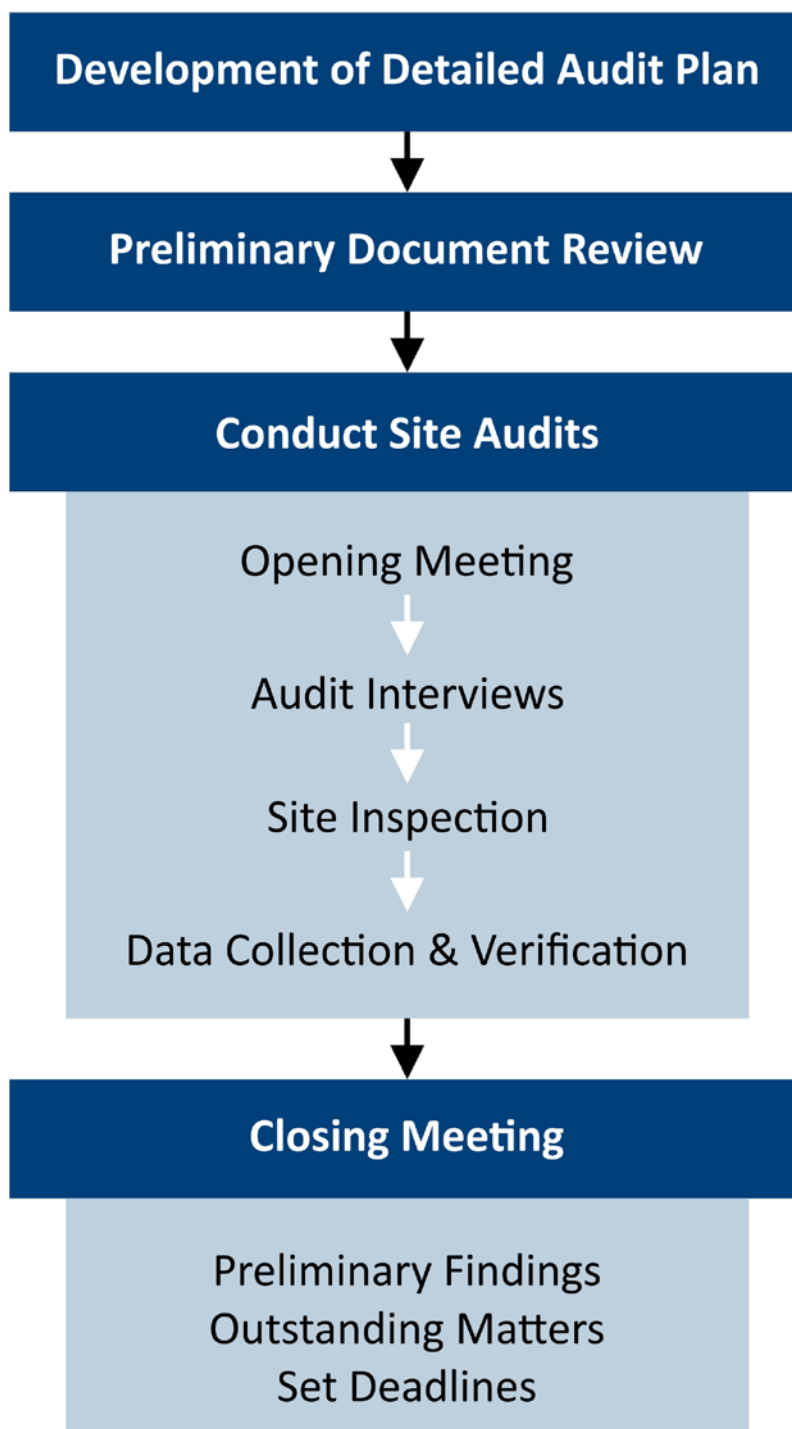


Figure 2.1

Audit Methodology

2.1 Audit Plan

A detailed audit plan, outlining the audit objectives, audit scope and audit criteria, including documentation required to be reviewed and personnel to be involved during the site inspections and interviews, was provided on commissioning of the project.

2.2 Preliminary Document Review

Available documentation such as the management plans/programs and monitoring reports and any other relevant documents was reviewed prior to undertaking the site interviews and inspections.

2.3 Notification of the Audit

Prior to the conduct of the environmental audit, site personnel were notified of the proposed audit and the documents required to be reviewed during the audit. A complete pre-audit document checklist was provided as part of the audit plan.

2.4 Opening Meeting and Preliminary Site Inspection

Upon commencement of the on-site component of the audit, an opening meeting was held with Amrish Trivedi, Environmental Advisor (QLD), Defence EMOS Contract, Spotless. This meeting involved a discussion of the proposed audit process and schedule by the auditor in addition to confirmation of arrangements for personnel interviews and site inspections.

2.5 Audit Interviews

Interviews with key personnel were held during the site inspection on 18 November 2015. Discussions were held with the following personnel:

- Amrish Trivedi, Environmental Advisor (QLD), Defence EMOS Contract, Spotless
- Richard Poli, Senior Environmental Manager, South Queensland, Defence
- Linda Oliver, Regional Environmental Officer, RAAF Base Amberley, Defence
- Dave Cloughton, Senior Professional Engineer, AECOM
- Walter Manley, Environmental Technician, AECOM.

2.6 Site Audit

A site inspection was conducted during the site audit on 18 November 2015, focussing on the matters relevant to Conditions 4 to 9 of EPBC Approval 2008/4410. The site inspection included a general tour of the site and a detailed inspection of the sites air quality monitoring station. The operation and reporting of results from the air quality monitoring station is undertaken by AECOM, who is contracted by Spotless on behalf of the Department of Defence. Dave Cloughton and Walter Manley from AECOM were present during the inspection of the air quality monitoring station and provided an overview of the operation of the station and data reporting processes.

2.7 Data Collection and Verification

The majority of the data and documents required to be reviewed during the audit were provided to the auditor prior to the site audit. These documents were reviewed prior to the site inspection and where appropriate an assessment of compliance was made. A list of outstanding documents was provided prior to arriving on site. Following the site inspection, a meeting was held to discuss each condition of approval and each compliance requirement contained in the Air Quality Monitoring Plan. Further documentation to support an assessment of compliance was provided to the auditor after the completion of the site audit and an audit report was prepared.

2.8 Evaluation of Audit Findings

The audit findings will be evaluated against the objectives and criteria detailed in the audit plan. Part of this evaluation was completed before leaving the site and reported in the closing meeting discussed below.

2.9 Closing Meeting

Prior to leaving the site, the auditor conducted a closing meeting with Amrish Trivedi from Spotless. The meeting included a discussion of any outstanding matters, presented preliminary findings, and requested and set deadlines for any additional information required.

2.10 Reporting

The audit report comprises this covering report, **Appendix 1** containing the letter of approval of the auditor from Department of Environment (DoE), **Appendix 2** containing the audit checklist for EPBC Approval 2008/4410, conditions 4 to 9, and **Appendix 3** containing the audit checklist for the Air Quality Monitoring Plan.

A ranking of compliance was made for each of the approval conditions and for all key commitments in the Air Quality Monitoring Plan, based on the following ranking definitions:

- **Compliance** - The intent and explicit requirements of the condition have been met. This includes meeting all requirements with respect to consultation (agency or otherwise), timing of actions or activities, the preparation of management plans or other specific requirements of the condition. The failure to meet any or all of the specific requirements of the condition would result in a non compliance.
- **Observation** - Occurs when the intent of the requirement has been satisfied, however an administrative aspect (e.g. the satisfaction with a third party has not occurred, or a timing requirement has not been satisfied). The failure to address the requirements will not however result in environmental harm.
- **Non-Compliance (NC)** - Occurs when all of the specific requirements of the condition have not been satisfied and/or environmental harm may result (e.g. monitoring not undertaken, reporting submitted more than two months late).
- **Verification** - The inability to provide formal written verification (letter, fax, email, meeting minutes, etc.) that a requirement has been met does not necessarily result in a non compliance. If the auditor is able to verify by other demonstrable means (visual inspection, personal communication, etc.) that a condition has been met then, in most cases, the operation should be considered to be in compliance for that condition.

- Area of Concern - The intent of the condition has been met; however it is considered that either the issue has the potential to deteriorate to a non-compliance if not further addressed or further improvement is recommended.
- Not Triggered - A condition or requirement has an activation or timing requirement which had not been triggered or completed at the time of the audit and therefore a determination of compliance could not be made. It is recommended that future audits assess compliance of any conditions or requirements that were found to have not been triggered during this audit.

A summary is contained in **Section 3.0** of this covering report of any observations, non-compliance or areas of concern, including associated recommendations.

3.0 Summary of Audit Findings

A summary of the audit findings are presented in this section. A detailed assessment of compliance with each condition of EPBC Approval 2008/4410 and the Air Quality Monitoring Plan are contained in Appendices 2 and 3 respectively.

The findings of this audit are based upon visual observations of the site and its vicinity, interviews with site personnel and our interpretation of the documentation provided. Opinions presented herein apply to the site as it existed at the time of the audit and from information provided by site personnel. Any changes to this information of which Umwelt is not aware and has not had the opportunity to evaluate cannot therefore be considered in this report.

3.1 EPBC Approval 2008 / 4410 Compliance

The auditor identified that at the time of the audit, RAAF Base Amberley was generally operating in accordance with most compliance requirements relating to air quality. Most importantly, the key aspects of air quality management and monitoring were being implemented. Where non-compliances are noted, these were minor and typically administrative in nature and did not result in environmental harm.

A full compliance checklist against the requirements of EPBC Approval 2008/4410 was completed as part of the audit and is included as **Appendix 2**. This checklist identifies the evidence sighted to assess compliance and provides comments regarding compliance status. Observations, areas of non-compliance and areas of concern are outlined below.

Condition 4 (as varied 23 April 2014) – Observation

The person taking the action must implement the approved Air Quality Monitoring Plan.

As detailed in **Appendix 3**, the majority of the requirements of the Air Quality Monitoring Plan were being implemented, including rain water tank testing, and air quality monitoring and reporting. However there were a number of minor non-compliances relating to website references that were no longer active, availability of monitoring reports on the web, tabling of monitoring reports at the Amberley Consultative Working Group (with the exception of water tank testing) and annual reviews of the Air Quality Monitoring Plan. None of the issues identified were considered to have potential to result in environmental harm.

It is recommended that the annual review of the Air Quality Monitoring Plan be completed as detailed in the Plan, or the Plan be amended to reflect the intended review cycle. The web references in the Plan should be updated to contain the current web location of monitoring and testing reports. Air quality monitoring reports should be tabled at the Amberley Consultative Working Group meetings.

Condition 5 (as approved 23 March 2010) - Observation

The person taking the action must ensure that independent audits of compliance with the conditions of approval are conducted in 2012, 2014 and 2018, and the audit reports submitted to the Minister within 3 months of completion. Each auditor's report must include an audit of the proposal against the approval conditions and any requirements of a plan, program or strategy required by the approval conditions. The independent auditor must be approved by the Minister prior to the commencement of the audit.

Condition 5 as approved on 23 March 2010 required an independent audit to be completed in 2012, as well as 2014 and 2018. The Approval was subsequently varied on 23 April 2014, updating the condition to require an audit for the period from the date of the approval to 31 December 2014. There was no audit completed in 2012 and no documentation or evidence sighted prior to the variation on 23 April 2014, granting an extension to the audit timeframe. The audit completed in 2015 is the first independent compliance audit to be completed. While the variation approved on 23 April 2014 negated the need to complete the 2012 audit, as originally required of the Approval granted on 23 March 2010, this variation was approved well after the audit was due to be completed.

It is recommended that any variations being sought to compliance timeframes be obtained prior to the timeframes falling due, in order to adequately address compliance requirements.

Condition 5 (as varied 23 April 2014) - Observation

The person taking the action must ensure that an Independent Audit of Compliance with the Conditions of Approval, including implementation of the requirements of approved plans, is conducted for each of the following periods.

- a. Period 1: from the date of the approval to 31 December 2014;**
- b. Period 2: from 1 January 2015 to 31 December 2018.**

Each auditor's report must be submitted to the Minister within 6 months of the end of the period to which the report applies. Each auditor's report must be published on the web site of the person taking the action within 3 months of the report being submitted to the Minister.

The independent auditor must be approved prior to the commencement of each audit.

The audit to which this report applies is for the period from the date of the approval to 31 December 2014. The audit was commissioned 25 September 2015, with the site audit undertaken on 18 November 2015 and reporting undertaken in December 2015. Condition 5 requires the audit report to be provided to the Minister within 6 months of 31 December 2014, i.e. by 30 June 2015. No evidence was sighted of DoE granting an extension to the timeframe for this audit.

It is recommended that timeframes for the completion of future audits be met or approval obtained from DoE for extensions to timeframes.

Condition 8 (as varied 23 April 2014) - Observation

If the person taking the action wishes to carry out any activity other than in accordance with the management plans as specified in the conditions, the person taking the action must submit for the Minister's written approval a revised version of that management plan. The varied activity shall not commence until the Minister has approved the varied management plans in writing. The Minister will not approve a varied management plan unless the revised management plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised management plan, that management plan must be implemented in place of the management plan originally approved.

As detailed in response to Condition 4 above, the majority of the requirements of the Air Quality Monitoring Plan were being implemented, including rain water tank testing, and air quality monitoring and reporting. However there were a number of minor issues relating to website references that were no longer active, availability of monitoring reports on the web, tabling of monitoring reports at the Amberley Consultative Working Group (with the exception of water tank testing) and annual reviews of the Air Quality Monitoring Plan. Condition 8 requires the Minister to approve any variations to the implementation

of the management plans, including the Air Quality Monitoring Plan. No evidence was sighted of the Minister approving variations to the Air Quality Monitoring Plan.

It is recommended that all of the requirements specified in the Air Quality Monitoring Plan be implemented or the Plan be reviewed, updated and changes approved by the Minister. Given the Plan has not been reviewed and updated since October 2012, a review and update to the Plan is highly recommended.

3.2 Air Quality Monitoring Plan

A full compliance checklist against the requirements of the Air Quality Monitoring Plan was completed as part of the audit and is included as **Appendix 3**. This checklist identifies the evidence sighted to assess compliance and provides comments regarding compliance status. Observations, areas of non-compliance and areas of concern are outlined below.

In summary, the majority of the requirements of the Air Quality Monitoring Plan were being implemented, including rain water tank testing, and air quality monitoring and reporting. However as detailed below, there were a number of minor observations relating to website references that were no longer active, availability of monitoring reports on the web, tabling of monitoring reports at the Amberley Consultative Working Group (with the exception of water tank testing) and annual reviews of the Air Quality Monitoring Plan. None of the issues identified were considered to have potential to result in environmental harm.

Section 3 - Web site location to access a copy of the Public Environment Report - Observation

When the website link was checked, it was found to be an invalid link. This is a minor issue can be readily addressed and that would not result in environmental harm. It is recommended that the Air Quality Management Plan be updated to reflect the current location for accessing the Public Environment Report.

Section 25 - Air Quality Monitoring Report tabled to the community through the Amberley Consultative Working Group (ACWG) which includes representatives from Federal, State and Local government, community leaders and interested members of the community. The report will be made available on the RAAF Base Amberley website - Observation

The web addressed referenced in the Plan to gain access to the monitoring report is no longer valid. The monitoring reports could not be found on the website. No evidence was provided of air quality monitoring reports being tabled at an ACWG meeting. These are considered minor issues that can be readily addressed and that would not result in environmental harm. It is recommended that the Air Quality Monitoring Reports be posted on the website and that the Plan be updated to reflect the website location. The monitoring report should also be tabled at the next ACWG meeting.

Section 29 - Rainwater tank testing results posted on website and the Ipswich library. Copies provided to the public if requested.

The web address referenced in the Plan to gain access to the report is no longer valid and the report was unable to be located on the website. No evidence was provided to verify that the report has been posted on the website or at the Ipswich library. It is recommended that the report be posted on the website and the Plan updated to reflect the website location. The report should also be provided to Ipswich library for the public to access.

Section 31 - Air Quality Monitoring Plan to be reviewed annually by Defence in the first quarter of each year in addition to the independent audits - Observation

The Air Quality Monitoring Plan is dated 9 October 2012 and is currently version 1.0. No evidence was provided that the Plan has been reviewed annually. It is recommended that the Plan be reviewed and updated, including taking into account the findings of this audit. The updated Plan will then need to be approved by the Minister.

Section 33 - Independent audit of compliance in accordance with Condition 5 of the Approval - Observation

As detailed in **Section 3.1**, the compliance audit has not been undertaken in accordance with all of the requirements of condition 5. The audit was due to be reported to the Minister by 30 June 2015, which has not occurred. No evidence was provided of the Minister approving an extension to the audit timeframe. It is recommended that all future audits be conducted within the required timeframes, or an extension obtained from DoE prior to the audit falling due.

4.0 Conclusion

As detailed throughout this report, RAAF Base Amberley is currently complying with the majority of the compliance requirements as contained in EPBC Approval 2008/4410 and the associated Air Quality Monitoring Plan. The observations noted in this report are generally minor in nature and relate to administrative matters that are not considered likely to result in environmental harm. These matters can be easily rectified through implementing the recommendations outlined in this report.



APPENDIX 1

Department of Environment Letter of
Approval



Australian Government
Department of the Environment

Our reference: 2008/4410

Contact Officer: Peter Blackwell
Telephone: (02) 6274 1470 Facsimile: (02) 6274 1878
Email: post.approvals@environment.gov.au

Mr Kitcher, OAM
Air Commodore
Director General Capability Planning – Air Force
R1-6-C072
PO Box 7902
CANBERRA BC ACT 2610

Dear Mr Kitcher

Australian Super Hornet Flying Operations (EPBC 2008/4410)
Appointment of Independent Auditors

Thank you for your letter dated 16 January 2015 regarding the independent audit of compliance with the conditions of approval under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) dated 23 March 2010 and subsequent variations dated 30 January 2012 and 23 April 2014.

In your letter you have sought, in accordance with condition 5 of EPBC Approval 2008/4410, for the Aircraft Noise Ombudsman and Umwelt Environmental Consultants to be appointed as Independent Auditors.

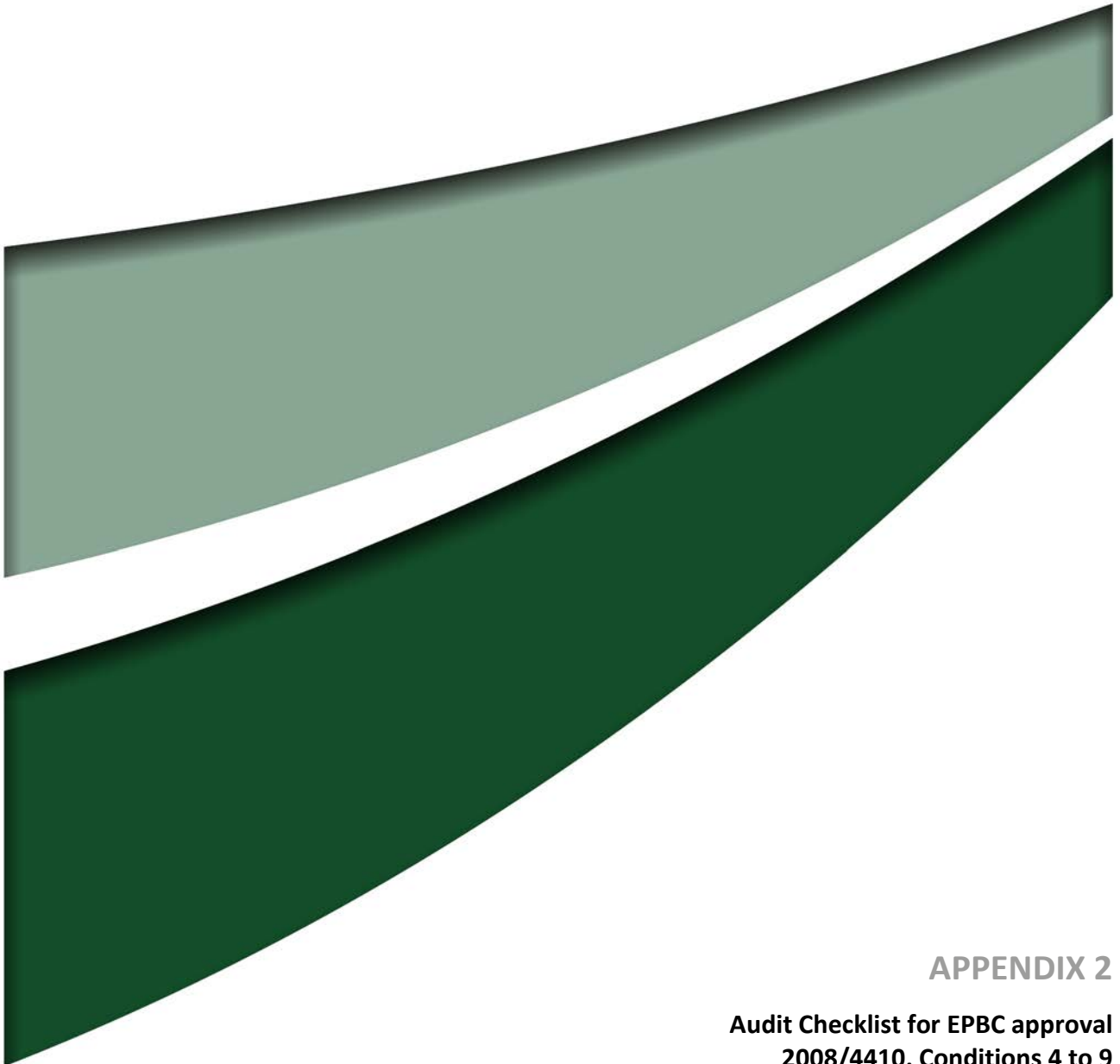
The request has been assessed and I am pleased to advise, as delegate of the Minister, that I approve the Aircraft Noise Ombudsman and Umwelt Environmental Consultants to be appointed as the Independent Auditors. I look forward to receiving a copy of the audit report.

If you would like to discuss this matter further please contact Mr Peter Blackwell on 02 6274 1470.

Yours sincerely

Shane Gaddes
Assistant Secretary
Compliance & Enforcement Branch
Environment Assessment and Compliance Division

4/2/2015



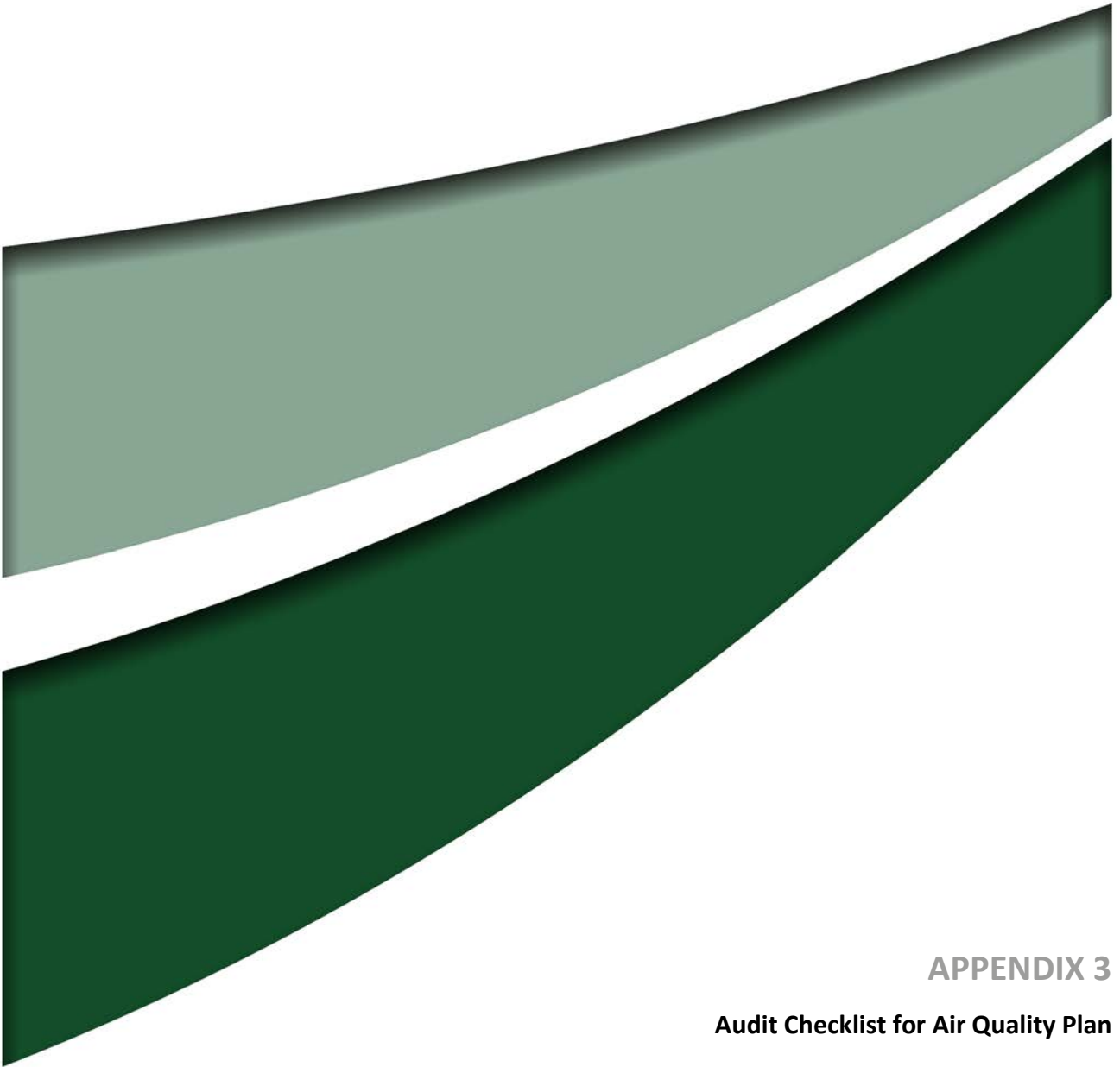
APPENDIX 2

**Audit Checklist for EPBC approval
2008/4410, Conditions 4 to 9**

EPBC 2008/4410 Conditions of Approval

Condition Number	Requirement - approval dated 23 March 2010	Requirement - Variation dated 30 January 2012	Requirement - Variation dated 23 April 2014	Compliance C/NC/OBS/NT/ V/AOC/NA	Evidence	Recommendations	Comments
4	4. The person taking the action must provide for approval by the Minister an Air Quality Monitoring Plan that includes: a. Monitoring air quality near a sensitive receiver in close proximity to or on RAAF Base Amberley; b. A process for validation of the accuracy of Super Hornet air quality impacts modelled in the Public Environment Report of the action; c. Should the measured air quality values exceed relevant air quality objectives, a commitment to working with the relevant State authorities to determine sources of pollutants and potential mitigation measures; d. An undertaking to post the results of rain tank water quality testing conducted in accordance with the Public Environment Report on an appropriate website for public information; and e. In the event that rainwater contamination is found to occur as a result of the proposal, identification and implementation of appropriate measures to mitigate the contamination. The Air Quality Monitoring Plan must be submitted for approval by 1 July 2010. The approved plan must be implemented.			C	Air Quality Monitoring Plan V 1.0 sighted. Plan dated 9 October 2012. Letter sighted, dated 5/12/11 requesting extension to the submission of the Plan from 1 July 2010 to June 2012. The extension was approved by way of variation to the approval on 30/1/12. a) Section 21 of the Plan identified that Defence will establish air monitoring stations and Section 22 describes how a consultant will be engaged to determine monitoring station siting. The Plan however does not include a plan showing the location of monitoring sites. This is provided in the Air Quality Monitoring Station Site Selection (AECOM, May 2014). b)Section 24 of the Plan includes a process for the validation of modelled air quality impacts. c) Section 27 of the Plan includes a commitment to work with relevant authorities if air quality levels exceed objectives. d) Section 29 of the Plan includes a commitment to post rain water testing results on the RAAF Base Amberley website. e) Section 30 of the Plan outlines a process to mitigate contamination if it is found. Refer to Appendix 3 for a discussion of compliance in relation to the implementation of the Plan.	Update Air Quality Monitoring Plan to include the location and details of the air quality monitoring program.	
4		4.The person taking the action must provide for approval by the Minister an Air Quality Monitoring Plan that includes: a. Monitoring air quality near a sensitive receiver in close proximity to or on RAAF Base Amberley; b. A process for validation of the accuracy of Super Hornet air quality impacts modelled in the Public Environment Report of the action; c. Should the measured air quality values exceed relevant air quality objectives, a commitment to working with the relevant State authorities to determine sources of pollutants and potential mitigation measures; d. An undertaking to post the results of rain tank water quality testing conducted in accordance with the Public Environment Report on an appropriate website for public information; and e. In the event that rainwater contamination is found to occur as a result of the proposal, identification and implementation of appropriate measures to mitigate the contamination. The Air Quality Monitoring Plan must be submitted for approval by 1June 2012. The approved plan must be implemented. approved plan must be implemented.		C	Air Quality Monitoring Plan V 1.0 sighted. Plan dated 9 October 2012. Letter sighted, dated 5/12/11 requesting extension to the submission of the Plan from 1 July 2010 to June 2012. The extension was approved by way of variation to the approval on 30/1/12. A minute from GN Davies dated June 2012. notes that the draft Plan was submitted and DSEWPac provided comments on 30 May 2012. The minute dated June 2012, also notes that the updated Plan (following DSEWPac review) was provided to DSG for endorsement on 4 June 2012. While the final submission of the Plan to DSEWPac was after 1 June 2012, following an update to the Plan to address DSEWPac comments, it is considered that this condition has been satisfied as the Plan was submitted to DSEWPac prior to 1 June 2012. Approval was granted from DoE on 24 April 2014 (letter sighted). a) Section 21 of the Plan identified that Defence will establish air monitoring stations and Section 22 describes how a consultant will be engaged to determine monitoring station siting. The Plan however does not include a plan showing the location of monitoring sites. This is provided in the Air Quality Monitoring Station Site Selection (AECOM, May 2014). b)Section 24 of the Plan includes a process for the validation of modelled air quality impacts. c) Section 27 of the Plan includes a commitment to work with relevant authorities if air quality levels exceed objectives. d) Section 29 of the Plan includes a commitment to post rain water testing results on the RAAF Base Amberley website. e) Section 30 of the Plan outlines a process to mitigate contamination if it is found. Refer to Appendix 3 for a discussion of compliance in relation to the implementation of the Plan.	Update Air Quality Monitoring Plan to include the location and details of the air quality monitoring program.	
4			4. The person taking the action must implement the approved Air Quality Monitoring Plan.	OBS	Refer to Appendix 3 of the audit report for a full assessment of compliance with the requirements of the Air Quality Monitoring Plan. As detailed in Appendix 3, full compliance with the requirements of the Plan could not be demonstrated.		
5	5. The person taking the action must ensure that independent audits of compliance with the conditions of approval are conducted in 2012, 2014 and 2018, and the audit reports submitted to the Minister within 3 months of completion. Each auditor's report must include an audit of the proposal against the approval conditions and any requirements of a plan, program or strategy required by the approval conditions. The independent auditor must be approved by the Minister prior to the commencement of the audit.			OBS	Independent Audit not completed within the required timeframe. No audit was completed in 2012 and no evidence was sighted of DoE granting an extension to the timeframe for this audit. The 23 April 2014 variation to the Approval negated the need to complete the 2012 audit, as originally required of the Approval granted on 23 March 2010, however this variation was approved after the audit was due to be completed.	Ensure all audits are completed within the required timeframe or that an extension to the timeframe or variation t the approval is requested and granted prior to the audit due date.	
5			5. The person taking the action must ensure that an Independent Audit of Compliance with the Conditions of Approval, including implementation of the requirements of approved plans, is conducted for each of the following periods. a. Period 1: from the date of the approval to 31 December 2014; b. Period 2: from 1 January 2015 to 31 December 2018. Each auditor's report must be submitted to the Minister within 6 months of the end of the period to which the report applies. Each auditor's report must be published on the web site of the person taking the action within 3 months of the report being submitted to the Minister. The independent auditor must be approved prior to the commencement of each audit.	OBS	Independent Audit not completed within the required timeframe. For the current audit (November 2015), the audit report was due to be submitted within 6 months of 31 December 2014, i.e. by 30 June 2015. No evidence was sighted of DoE granting an extension to the timeframe for this audit. Evidence was sighted of Umwelt being approved by DoE as the auditor (letter dated 4 February 2015).	Ensure all audits are completed within the required timeframe or that an extension to the timeframe or variation to the approval is requested and granted prior to the audit due date.	
6	6. The person taking the action must ensure all reports, plans, strategies and programs required by the approval conditions are publicly available on the proponent's website within three months of finalisation of the report, plan, strategy or program.		6. The person taking the action must publish on their web site all plans and strategies within 3 months of each plan or strategy being approved.	V	Air Quality monitoring Plan is posted on the RAAF Base Amberley website. Unable to verify if this was done within the required timeframe.	Maintain records of compliance.	

EPBC 2008/4410 Conditions of Approval							
Condition Number	Requirement - approval dated 23 March 2010	Requirement - Variation dated 30 January 2012	Requirement - Variation dated 23 April 2014	Compliance C/NC/OBS/NT/ V/AOC/NA	Evidence	Recommendations	Comments
6			6. The person taking the action must publish on their web site all plans and strategies within 3 months of each plan or strategy being approved.	V	Air Quality monitoring Plan is posted on the RAAF Base Amberley website. Unable to verify if this was done within the required timeframe.	Maintain records of compliance.	
7	7. If the Minister believes that it is necessary or desirable for the better protection of the environment the Minister may request that the person taking the action make specified revisions to the plans, programs or strategies approved pursuant to paragraphs 1, 2, 3 and 4 and submit the revised plan, program or strategy for the Minister's approval. The person taking the action must comply with any such request. If the Minister approves a revised plan, program or strategy pursuant to this condition, the revised approved plan, program or strategy must be implemented in place of the plan, program or strategy originally approved.		7. If the Minister believes that it is necessary or convenient for the better protection of listed threatened species and communities (s18& s18A) to do so, the Minister may request that the person taking the action make specified revisions to the management plans specified in the conditions and submit the revised management plans for the Minister's written approval. The person taking the action must comply with any such request. The revised approved management plans must be implemented . Unless the Minister has approved the revised management plans, then the person taking the action must continue to implement the management plans originally approved, as specified in the conditions.	N/T	No directions have been issued by the Minister (pers comms A. Trivedi, Spotless Environmental Advisor)		
8	8. If the person taking the action wishes to carry out any activity other than in accordance with a plan, program or strategy approved pursuant to paragraphs 1, 2, 3 and 4 the person taking the action must submit for the Minister's approval a revised version of any such plan, program or strategy. If the Minister approves the revised plan, program or strategy so submitted, the person taking the action must implement that plan, program or strategy instead of the plan, program or strategy as originally approved .		8. If the person taking the action wishes to carry out any activity other than in accordance with the management plans as specified in the conditions, the person taking the action must submit for the Minister's written approval a revised version of that management plan. The varied activity shall not commence until the Minister has approved the varied management plans in writing. The Minister will not approve a varied management plan unless the revised management plan would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised management plan, that management plan must be implemented in place of the management plan originally approved.	OBS	No revisions to the Air Quality Monitoring Plan requested. Refer to Appendix 3 for a detailed assessment of compliance against the requirements of the Plan. As detailed in Appendix 3, some requirements of the Plan have not been implemented. As required of Condition 8, any deviations from the Plan should have prior written approval from the Minister.	Comply with all requirements of the Plan or seek prior written approval from the Minister. Where appropriate, revise and update the Plan and obtain approval from the Minister for the revised Plan.	
9	9. The person taking the action must maintain accurate recordsubstantiating all activities associated with or relevant to the above conditions of approval, including measures taken to implement the plans, programs and strategies required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Departments website. The results of audits may also be publicised through the general media.		9. The person taking the action must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement the management plans required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the Department or an independent auditor in accordance with section 458 of the EPBC Act, or used to verify compliance with the conditions of approval. Summaries of audits will be posted on the Department's website. The results of audits may also be publicised through the general media.	C	Records of compliance considered adequate. While evidence of compliance could not be provided for all conditions and management plan commitments, generally the records of compliance were adequate. No audits completed to date therefore the requirement for posting audit results on the website is yet to be triggered.		
10	10. If, at any time after five years from the date of this approval, there has not been substantial commencement of the proposal, the proposal must not thereafter be commenced.			N/A	Approval commenced. Super hornets arrived 2012 (pers comm A. Trivedi). Super Hornets verified to be operating on site during the site inspection.		
	Compliant			3			
	Non-Compliant (NC)			0			
	Non-Compliant (OBS)			4			
	Area of Concern			0			
	Verification			2			
	Not Triggered			1			
	Not Applicable			1			



APPENDIX 3

Audit Checklist for Air Quality Plan

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)					
Section	Summary of the requirement	Compliance C/NC/OBS/N T/V/AOC/NA	Evidence	Recommendations	Comments
1	Background - no action required	NA			
2	Plan to be submitted for approval by DSEWPaC (now DoE)	C	Letter dated 24 April 2014 from Shane Gaddes, Department of Environment approving the Plan sighted.		
3	A copy of the PER can be found at http://www.airforce.gov.au/Aircraft/FlyingOperations.aspx	OBS	This site/page could not be found when entered into an internet search engine	Update Plan with current web location.	
4	Purpose - no action required	NA			
5	Scope - no action required	NA			
6	Overview of other plans required o the Approval - no action required	NA			
7	Summary of likely impacts - no action required	NA			
8	Summary of likely impacts - no action required	NA			
9	Summary of likely impacts - no action required	NA			
10	Summary of likely impacts - no action required	NA			
11	Summary of likely impacts - no action required	NA			
12	PER consultation summary - no action required	NA			
13	PER consultation summary - no action required	NA			
14	PER consultation summary - no action required	NA			
15	PER consultation summary - no action required	NA			
16	PER consultation summary - no action required	NA			
17	PER consultation summary - no action required	NA			
18	Repeat rainwater tank testing in 2012 or 2013, after the arrival of all 24 Super Hornets	C	Rainwater Tank Testing - Post Introduction Testing report (AECOM, 4 July 2014) sighted. Sampling completed in November 2013 and Jan / Feb 2014 (resampling due to laboratory non-compliance with testing method. All superhornets arrived on 21st October 2011 (pers comm A Trivedi)		

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)					
Section	Summary of the requirement	Compliance C/NC/OBS/N T/V/AOC/NA	Evidence	Recommendations	Comments
19	Water sampling to be completed within a one week period preferably during dry conditions and analysed for the constituents detailed in the Plan	C	Rainwater Tank Testing - Post Introduction Testing report (AECOM, 4 July 2014) sighted. Sampling completed as per the requirements outlined in the Plan.		
20	Results assessed against the guidelines detailed in the Plan	C	Rainwater Tank Testing - Post Introduction Testing report (AECOM, 4 July 2014) sighted. Results assessed against the guidelines.		
21	Establish air monitoring station/s near a sensitive receiver in close proximity to or on RAAF Base Amberley	C	Air Quality Monitoring Plan V 1.0 (October 2012) sighted. Air Quality Monitoring Station Site Selection (AECOM, May 2014) report sighted. Site established on the base. Annual and quarterly monitoring reports for 2014/15 sighted. Monitoring station inspected during the audit site inspection.		
22	Consultant engaged to determine monitoring station siting.	C	Air Quality Monitoring Station Site Selection (AECOM, May 2014) report sighted. Site established on the base, as verified during the audit site inspection.		
23	Air quality objective goals taken from PER and are consistent with government policy and NEPM	C	Air Quality Monitoring Annual Report June 2014 - May 2015 (AECOM, Aug 2015) sighted. Objectives listed in Table 4 are consistent with requirements of the Plan.		
24	Consultant engaged to undertake monitoring. Results reported annually. Report evaluates accuracy of the predictions as modelled in the PER and compares results against the air quality objectives	C	Air Quality Monitoring Annual Report June 2014 - May 2015 (AECOM, Aug 2015) sighted. Section 7.0 contains a comparison against the PER predictions and air quality objectives.		
25	Air Quality Monitoring Report tabled to the community through the Amberley Consultative Working Group (ACWG) which includes representatives from Federal, State and Local government, community leaders and interested members of the community. The report will be made available on the RAAF Base Amberley website.	OBS	The web addressed referenced in the Plan to gain access to the monitoring report is no longer valid. Unable to locate monitoring reports on website. No evidence sighted of monitoring report being tabled at an ACWG meeting.	Ensure monitoring reports are tabled at ACWG meetings and maintain records of the meeting. Include monitoring report on the website, and update the Plan to include current web location.	
26	Air quality monitoring and reporting to continue for 3 years to verify accuracy of PER predictions. Monitoring and reporting to be extended if prediction can not be verified during this timeframe.	NT	Monitoring commenced in 2014. Monitoring to continue for 3 years before deciding if monitoring should continue for a further period.		
27	If air quality values exceed objectives, Defence to work with relevant authorities to determine sources of pollution and reasonable mitigation measures.	NT	Air Quality Monitoring Annual Report June 2014 - May 2015 (AECOM, Aug 2015) and Quarterly Monitoring Report June - August 2015 (AECOM, September 2015) sighted and both report no exceedences of objectives.		
28	Second round of rainwater Tank testing planned for 2012 or 2013	C	Rainwater Tank Testing - Post Introduction Testing report (AECOM, 4 July 2014) sighted. Sampling completed in November 2013 and Jan / Feb 2014 (resampling due to laboratory non-compliance with testing method.		

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)					
Section	Summary of the requirement	Compliance C/NC/OBS/N T/V/AOC/NA	Evidence	Recommendations	Comments
29	Rainwater tank testing results posted on website and the Ipswich library. Copies provided to the public if requested	OBS	The web address referenced in the Plan to gain access to the report is no longer valid. Unable to locate report on the website. No evidence provided to verify that the report has been posted on the website or at the Ipswich library.	Update Plan with current web location. Ensure tank testing results are posted on the website, provided to Ipswich library and provided to the public if requested.	
30	If rainwater contamination is found, notify the relevant authorities, as detailed in the Plan and work with authorities to identify and implement mitigation measures	NT	Rainwater Tank Testing - Post Introduction Testing report (AECOM, 4 July 2014) sighted. Results assessed against the guidelines and no exceedences reported.		
31	Air Quality Monitoring Plan to be reviewed annually by Defence in the first quarter of each year in addition to the independent audits	OBS	Plan dated 9 October 2012 and is currently version 1.0. No evidence sighted that the Plan has been reviewed annually.	Complete the annual review of the Plan in the first quarter of the year and update the Plan accordingly. Any updates to the Plan will also require the Ministers approval.	
32	If the Plan is modified, the revised Plan to be submitted to the Environment Minister for approval. Air quality monitoring to adhere to the most recently approved Plan until the modified Plan is approved.	NT	The Plan has not be revised.		
33	Independent audit of compliance in accordance with Condition 5 of the Approval	OBS	Refer to Appendix 2 for the details		
34	Environment Minister may request revisions to the Plan at any time in accordance with condition 7 of the Approval	NT	No revisions to the Plan requested (pers comms A Trivedi)		
35	Maintain accurate records associated with implementing the Plan and make them available to DSEWPaC (now DoE) or an independent auditor	C	Records considered to be adequate.		
	Compliant	10			
	Non-Compliant	0			
	Observation	5			
	Area of Concern	0			
	Verification	0			
	Not Triggered	5			
	Not Applicable	15			



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