Enclosure 1
to BP5431867
dated 22 Oct 19

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RAAF BASE AMBERLEY INDEPENDENT COMPLIANCE AUDIT

EPBC Approval 2008/4410

FINAL

June 2019

RAAF BASE AMBERLEY INDEPENDENT COMPLIANCE AUDIT

EPBC Approval 2008/4410

FINAL

Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Department of Defence

Project Director:	John Merrell
Project Manager:	Daniel Sullivan
Report No.	4597/R01/FINAL
Date:	June 2019

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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 Defence to complete an audit of conditions 4 to 9 of EPBC Approval 2008/4410 and as required by Condition 5 Umwelt were approved to complete this audit by the Department of Environment and Energy (DoEE) (refer to **Appendix 1**). Conditions 4 to 9 primarily relate to air quality monitoring.

Conditions 1 to 3 relate to noise management and do not form part of the Umwelt scope of works. Umwelt understands that the audit of the Conditions of Approval relating to noise management was undertaken by the Aircraft Noise Ombudsman (ANO).

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 DoEE in correspondence dated 29 April 2014 (Ref:2012/07926). AECOM was 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 Figure2.1 below and discussed further in **Sections 2.1** to **2.12.**

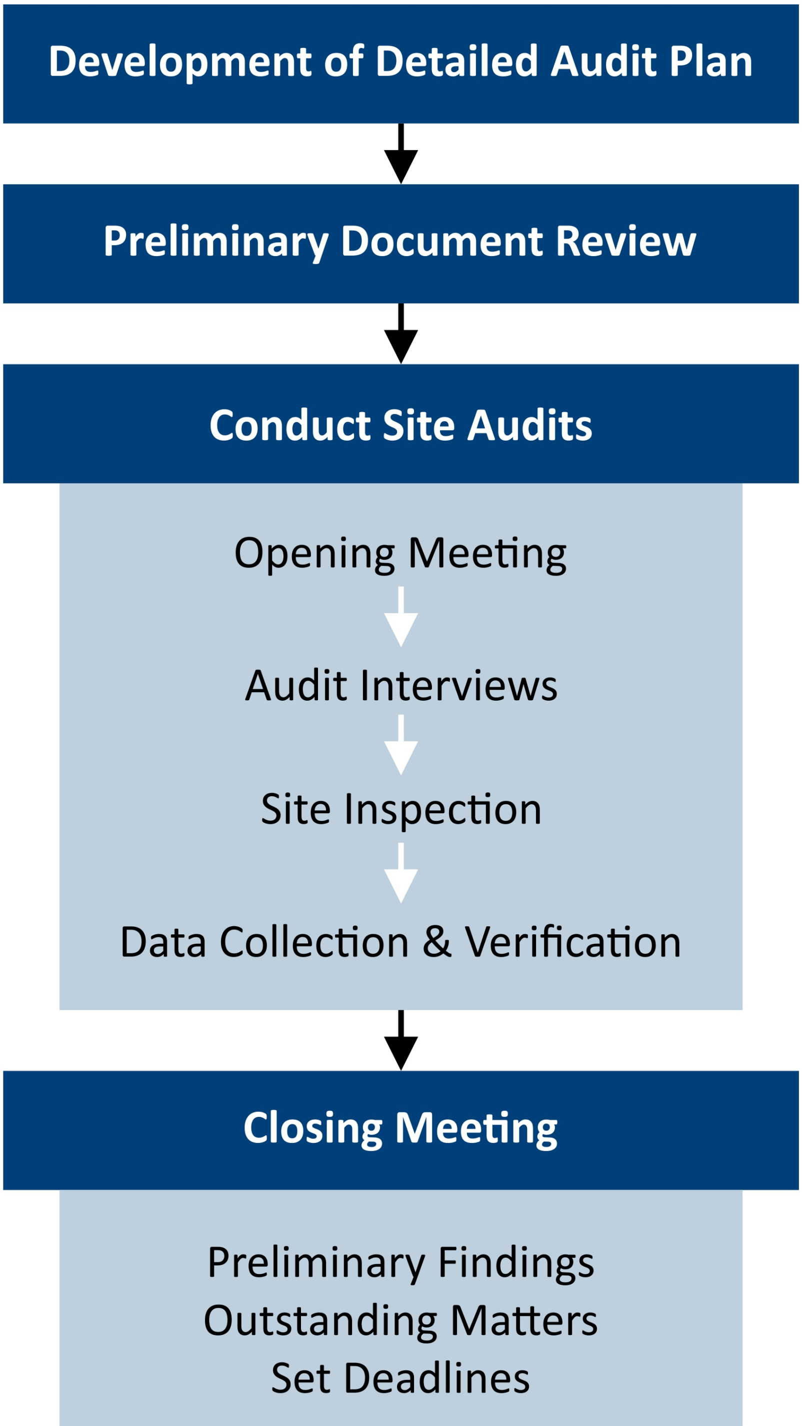

Figure 2.1

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. As required by the DoEE 2015 *Independent Audit and Audit Report Guidelines* (DoEE Audit Guidelines) as part of the development of the audit plan the proposed audit criteria and methodology was provided to DoEE for approval. The audit criteria and methodology was approved by DoEE on 23 May 2019 with a copy of the approval letter provided in **Appendix 1**.

2.2 Preliminary Document Review

Available documentation such as the air quality monitoring program, monitoring reports and any other relevant documents were 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. An indicative audit itinerary 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 the following personnel:

- Richard Poli, Senior Environmental Manager, South Queensland, Defence
- Linda Oliver, Environment and Sustainability Manager, RAAF Base Amberley, Defence
- Sean Cummins, Environment and Energy Officer, Air Force
- Walter Manley, Environmental Technician, AECOM.

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 6 June 2019. Discussions were held with the following personnel:

- Richard Poli, Senior Environmental Manager, South Queensland, Defence
- Linda Oliver, Environment and Sustainability Manager, RAAF Base Amberley, Defence
- Sean Cummins, Environment and Energy Officer, Air Force
- Walter Manley, Environmental Technician, AECOM.

2.6 Site Audit

A site inspection was conducted during the site audit on 6 June 2019, 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 Defence. Walter Manley from AECOM was 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. As part of 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 this audit report was prepared.

2.8 Evaluation of Audit Findings

The audit findings have been evaluated against the audit criteria methodology as approved by DoEE (refer to **Appendix 2**). 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 Linda Oliver and Sean Cummins. 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 and letter of approval of the audit criteria and methodology from DoEE, **Appendix 2** containing the audit criteria and methodology for EPBC Approval 2008/4410, conditions 4 to 9, **Appendix 3** containing the audit checklist for the Air Quality Monitoring Plan and **Appendix 4** containing a list of the documentation that has been reviewed.

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 as provided in the DoEE Audit Guidelines:

- Compliance – A rating of 'compliance' is given when the auditee has complied with a condition or element of a condition

- Non-Compliance – A rating of 'non-compliance' is given when the auditee has not met a condition or an element of a condition

- Not Applicable – A rating of ‘not applicable’ at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered

- Observation – An ‘observation’ may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition

- Undetermined – A rating of ‘undetermined’ is given when the condition or element of a condition falls inside the scope of the audit but there is insufficient evidence to make a judgment on compliance or non-compliance

A summary is contained in **Section 3.0** of this report of any observations, non-compliance or areas of concern, including associated recommendations with the full detailed findings against the audit criteria and methodology provided in **Appendix 2**.

3.0 Summary of Audit Findings

A summary of the audit findings is 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 **Appendix 2** and **Appendix 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, with the exception of a period of monitoring that was not completed between June 2017 and June 2018. With the exception of the 12 months when monitoring was not undertaken the non-compliances identified were generally minor in nature or considered low risk. These matters can be easily rectified through implementing the recommendations outlined in this report.

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. Areas of non-compliance and observations are outlined below.

Condition 4 – Non-Compliance

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

As detailed in **Appendix 3**, while the majority of the requirements of the Air Quality Monitoring Plan were being implemented, there were a number of commitments or requirements that were not completed during the audit period in accordance with the approved plan. These included a gap in the required air quality monitoring program where no monitoring was completed between June 2017 and June 2018. It was communicated that this was determined to be a systemic fault where the monitoring contract was not renewed for this period.

It is noted following a review of all available air quality monitoring data before and after this period confirmed that there have been no exceedances of the reporting guidelines for any of the parameters that are required to be monitored.

There were also a number of more minor non-compliances relating to: website references that were no longer active; monitoring reports not being made available on the web; monitoring reports not being tabled at the Amberley Consultative Working Group; annual reviews of the Air Quality Monitoring Plan not being completed; and the current version of the plan not being revised since it was prepared in October 2012. In particular it was noted both in the previous audit report and during this audit that the Air Quality Monitoring Plan does not include a figure or any reference to the location of the monitoring location.

Besides the lack of monitoring the non-compliances with the Air Quality Monitoring Plan were generally minor in nature or considered low risk.

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 plan would benefit from a thorough revision to ensure all details within it are up to date and to reflect what is intended to be conducted in order to a maintain compliance with Condition 4. All reports required to be made available on the web should be uploaded and air quality monitoring reports should be tabled at the Amberley Consultative Working Group meetings.

Condition 5 – Non-Compliance

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.

Condition 5 requires each audit report to be provided to the Minister within 6 months of the end of the period to which the audit applies. A non-compliance was identified in this regard for the audit required to be completed covering Period 1. The previous audit report was due to be submitted on 30 June 2015 however was not finalised until January 2016. No evidence was sighted of DoEE granting an extension to the timeframe for this audit. Further no evidence available to confirm when the final audit report was submitted to the Department.

It is recommended that this current audit report as completed for Period 2 be submitted to the Minister as required by 30 June 2019.

Condition 5 – Non-Compliance

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 previous audit report for Period 1 has not been published on the Amberley website.

It is recommended that the previous audit report for Period 1 be published on the web and that once completed and submitted that this current audit report be published.

Condition 8 - 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, a number of minor issues relating to the implementation of the approved Air Quality Monitoring Plan were identified by this audit and the previous audit including website references that were no longer active, availability of monitoring reports on the web, tabling of monitoring reports at the Amberley Consultative Working Group 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. Areas of non-compliance are outlined below.

In summary, while the majority of the requirements of the Air Quality Monitoring Plan were being implemented, there were a number of commitments or requirements that were not completed during the audit period in accordance with the approved plan. These included a gap in the required air quality monitoring program where no monitoring was completed between June 2017 and June 2018. Further there were also a number of more minor non-compliances relating to website references that were no longer active, monitoring reports not being made available on the web, monitoring reports not being tabled at the Amberley Consultative Working Group and annual reviews of the Air Quality Monitoring Plan not being completed.

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. The Public Environment Report is available on the website at http://www.defence.gov.au/AirCraftNoise/Environment/PublicEnvironmentReport.asp

It is recommended that the Air Quality Management Plan be updated to reflect the current location for accessing the Public Environment Report.

Section 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 - Non-Compliance

AECOM has been engaged for most of the audit period to conduct air quality monitoring in accordance with the plan. However, it was identified that there was a period between June 2017 to June 2018 when monitoring was not completed as required.

For each of the annual air quality monitoring reports completed section 7.0 of each report contains a comparison against the PER predictions and air quality objectives.

Section 25 - Air Quality Monitoring Report tabled to the community through the Amberley Consultative Working Group 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 – Non-Compliance

The web address 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 future ACWG meeting.

Section 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 cannot be verified during this timeframe – Non-Compliance

Monitoring commenced in 2014. Monitoring was required to be completed for the duration of the audit period however as identified there was a period between June 2017 to June 2018 when monitoring was not completed as required

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

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 – Non-Compliance

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.

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. With the exception of the 12 months when monitoring was not undertaken the non-compliances identified were generally minor in nature or considered low risk. These matters can be easily rectified through implementing the recommendations outlined in this report.

APPENDIX 1

Department of Environment and Energy
Letter of Approval

Our reference: EPBC 2008/4410

Mr Mark Green
Air Commodore
Director General Air Capability Enablers
Air Force Headquarters
PO Box 7902
CANBERRA BC 2610

Dear Mr Green

Re: *DEPARTMENT OF DEFENCE, AUSTRALIAN SUPER HORNET FLYING OPEARTIONS, RAAF BASE AMBERLEY* (EPBC 2008/4221) – NOMINATION OF INDEPENDENT AUDITORS

Thank you for your correspondence dated 4 March 2019, regarding nomination of auditors to undertake the second compliance audit of the *Australian Super Hornet Flying Operations, RAAF Base Amberley Project*; approved 23 March 2010 under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) – EPBC 2008/4410.

In accordance with Condition 5 of the EPBC Act approval, you have sought approval for auditors from the Aircraft Noise Ombudsman and Umwelt (Australia) Pty Ltd to be appointed as the independent auditors to undertake the second compliance audit of the EPBC 2008/4410 project.

This request has been assessed and I am pleased to inform you, as delegate of the Minister for the Environment, that I approve the appointment of the auditors from the Aircraft Noise Ombudsman and Umwelt (Australia) Pty Ltd.

Please note that once the full composition of the audit team from the Aircraft Noise Ombudsman is determined, all additional team members undertaking the compliance audit will be required to complete an independence declaration.

If you would like to discuss this matter further please contact Mr Nicholas Scholar on (02) 6274 1284 or email audit@environment.gov.au.

Yours sincerely

Ms Monica Collins
Chief Compliance Officer
Office of Compliance
9 April 2019

Our reference: EPBC 2008/4410

Mr Mark Green
Air Commodore
Director General Air Capability Enablers
Air Force Headquarters
PO BOX 7902
CANBERRA BC 2610

Dear Mr Green

Re: Department of Defence, Australian Super Hornet Flying Operations, RAAF Base Amberley (EPBC 2008/4410) – *Approval of Audit Criteria*

I refer to correspondence of 6 May and 13 May 2019 in which the Aircraft Noise Ombudsman and Umwelt (Australia) Pty Ltd submitted the proposed audit criteria for the independent audit of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) approval EPBC 2008/4410.

Officers of the Department of the Environment and Energy (the Department) have reviewed the audit criteria and consider that it provides sufficient scope for an assessment of compliance with the conditions attached to the approval.

As delegate of the Minister for the Environment, I am pleased to inform you that I approve the proposed audit criteria subject to a few minor edits. Officers from the Environmental Audit Section will contact you shortly to discuss these minor amendments.

I request that you please submit the audit report to the Department by 30 June 2019 as required by condition 5 of the EPBC Act approval. I look forward to receiving a copy of the audit report.

Finally, I take this opportunity to remind you of the Department's expectations in terms of audit reports being required to include details of measurements made, sample sizes and audit evidence obtained. In considering the audit evidence obtained:

- there must not be an over-reliance on representations made by the approval holder or their representatives (i.e. audit findings should be based on independently verifiable third party evidence);
- where sample records are referenced (e.g. pre-clearance surveys) a representative random sample of a minimum of 10 per cent of the records must be reviewed; and
- statements that support audit findings must not include terms that are open to interpretation and they must provide sufficient context to inform the basis for audit conclusions.

Should you require any further information please contact Mr Nicholas Scholar on 02 6274 1284 or email at audit@environment.gov.au.

Yours sincerely

Ms Monica Collins
Chief Compliance Officer
Office of Compliance
23 May 2019

APPENDIX 2

Audit Criteria and Methodology for EPBC Approval 2008/4410, Conditions 4 to 9

Audit Criteria and Methodology

Australian Super Hornet Flying Operations, RAAF Base Amberly Project

EPBC 2008/4410

Client: Department of Defence

Date of Report: June 2019

Report prepared by: Daniel Sullivan – Approved Lead Auditor (Umwelt Australia Pty Ltd)

Scope:

The EPBC Conditions of Approval for the Australian Super Hornet flying operations at RAAF Base Amberley (EPBC 2008/4410), as most recently varied in April 2014, require that an independent Audit of Compliance be undertaken. Condition 5 specifies that the independent auditor should audit compliance with the Conditions of Approval, including implementation of the requirements of approved plans, for Period 2: from 1 January 2015 to 31 December 2018 (the audit period)

To fulfil the requirements of this audit Defence have been approved by DoEE to use the services of two different auditors because of the specialised expertise each organisation possesses. The Aircraft Noise Ombudsman will audit compliance with the noise related aspects required in Conditions of Approval 1-3 and 6-9. Umwelt will audit compliance with all the other key environmental values required in Conditions of Approval 4-9.

Accordingly, the audit criteria and methodology presented in **Table 1** relates to Umwelt's defined audit scope (Conditions of Approval 4-9). This audit criteria and methodology was approved by the Department of Environment and Energy in correspondence dated 23 May 2019 (refer to Appendix 1 of main audit report).

Table 1 Audit Criteria and Methodology for Umwelt Scope

<table>
<tr><td>EPBC Approval Condition Number 4</td><td colspan="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 June 2012.
The person taking the action must implement the approved Air Quality Monitoring Plan.</td></tr>
<tr><td>Criterion 1.1</td><td colspan="4">The person taking the action must provide for approval by the Minister an Air Quality Monitoring Plan prior to 1 June 2012</td></tr>
<tr><td>Indicator</td><td>Independent Auditor Comments</td><td>Measurements Made</td><td>Verification Method</td><td>Compliance Finding</td></tr>
<tr><td>1.1.1
The person taking the action must provide for approval by the Minister an Air Quality Monitoring Plan prior to 1 June 2012</td><td>It is noted that this was completed in the previous audit period (Period 1)</td><td>Initial submission letter dated 29 May 2012. Viewed Departments approval letter dated 29 April 2014.</td><td>View evidence of submission and subsequent approval</td><td>Compliance</td></tr>
<tr><td>Criterion 1.2</td><td colspan="4">The plan must include measures to:
(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;</td></tr>
</table>

	(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.

Indicator	**Independent Auditor Comments**	**Measurements made**	**Verification Method**	**Compliance Finding**
1.2.1 The plan must include measures to (a) Monitoring air quality near a sensitive receiver in close proximity to or on RAAF Base Amberley;	Air Quality Monitoring Plan V1.0 sighted. Plan dated 9 October 2012. It is noted that the plan has not been revised or updated since it was developed and approved.	Section 21 of the plan identified that Defence will establish an air monitoring station. Section 22 of the plan describes how a consultant will be engaged to determine monitoring station siting. The plan however does not include a figure showing the location of the monitoring site selected and used. This is provided in the Air Quality Monitoring Station Site Selection (AECOM, May 2014).	Review the plan to verify that it includes measure	Compliance
1.2.2 The plan must include measures to (b) A process for validation of the accuracy of Super Hornet air quality impacts modelled in the Public Environment Report of the action;		Section 24 of the plan includes a process for the validation of modelled air quality impacts.	Review the plan to verify that it includes measure	Compliance
1.2.3 The plan must include measures to (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;	It is noted that during this audit period and the previous audit period there have been no exceedances of reporting guidelines.	Section 27 of the plan includes a commitment to work with relevant authorities if air quality levels exceed objectives.	Review the plan to verify that it includes measure	Compliance

1.2.4 The plan must include measures to (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;		Section 29 of the plan includes a commitment to post rainwater testing results on the RAAF Base Amberley website.	Review the plan to verify that it includes measure	Compliance
1.2.5 The plan must include measures to (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.		Section 30 of the plan outlines a process to mitigate contamination if it is found.	Review the plan to verify that it includes measure	Compliance
Criterion 1.3	The person taking the action must implement the approved Air Quality Monitoring Plan.			
Indicator	**Independent Auditor Comments**	**Measurements made**	**Verification Method**	**Compliance Finding**
1.3.1 The person taking the action must implement the approved Air Quality Monitoring Plan.	A review against each of the commitments made in the approved plan identified a few commitments that were not completed or implemented during the audit period. Refer to Appendix 3 for a discussion of compliance in relation to the implementation of the Plan	Reviewed monitoring reports completed during the audit period. It was identified that there was a period between June 2017 to June 2018 when monitoring was not completed. Section 25 of the plan requires that the air quality monitoring reports are tabled at the Amberley Consultative Working Group (ACWG) meetings. No evidence in minutes reviewed that the air quality monitoring reports are tabled at these meetings. Section 29 of the plan requires that rainwater tank testing results are posted on	Review monitoring reports and results for the audit period to confirm the plan is being implemented. View website to confirm relevant results are provided for public information	**Non-compliance**

		the website and provided at the Ipswich Library. This has not occurred. Section 31 of the plan states that the plan will be reviewed annually in the first quarter of each year. This has not occurred, and it is noted that the plan has not be revised since it was prepared in October 2012.		
EPBC Approval Condition Number 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.			
Criterion 2.1	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.			

Indicator	Independent Auditor Comments	Measurements Made	Verification Method	Compliance Finding
2.1.1 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.	Period 1 audit report completed in 2015 with the report finalized in January 2016	Viewed audit report completed for Period 1 by Umwelt dated January 2016. This current audit is being completed to address the requirements for auditing in Period 2.	Period 1: Review previous audit report to confirm report was completed covering the required period Period 2: The Current Audit proposed to be completed as per this methodology and criteria	Compliance
Criterion 2.2	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.			
Indicator	**Independent Auditor Comments**	**Measurements made**	**Verification Method**	**Compliance Finding**
2.2.1 Each auditor's report must be submitted to the Minister within 6 months of the end of the period to which the report applies	The Period 1 audit report was not finalised until January 2016. This was not within 6 months of the end of the period to which the report applied as required.	No evidence of extension being granted by the Department for finalization and submission of audit report outside the required timeframe. No evidence available to confirm when the final audit report was submitted to the Department.	View submission letter and correspondence to confirm that the audit for Period 1 has been submitted to the Minister within required time Evidence for Period 2 Report not applicable as submission of audit report is outside audit period	**Non-compliance**
2.2.2 Each auditor's report must be published on the website of the person taking the action within 3 months of the report being submitted to the Minister.		The previous audit report for Period 1 is not published on the Amberley website	View Period 1 audit report on website and evidence of when it was uploaded Evidence for Period 2 Report not applicable as submission of audit report is outside audit period	**Non-compliance**

Criterion 2.3	The independent auditor must be approved prior to the commencement of each audit.			
Indicator	**Independent Auditor Comments**	**Measurements Made**	**Verification Method**	**Compliance Finding**
2.3.1 The independent auditor must be approved prior to the commencement of each audit.		Umwelt were approved prior to the commencement of the Period 1 audit (viewed approval letter dated 4 February 2015). Umwelt were approved prior to the commencement of the Period 2 audit (viewed approval letter dated 9 April 2019) For the Period 2 audit the Department also approved Umwelt's proposed audit criteria and methodology in correspondence dated 23 May 2019.	View approval letters for each audit	Compliance
EPBC Approval Condition Number 6	The person taking the action must publish on their website all plans and strategies within 3 months of each plan or strategy being approved.			
Criterion 3.1	The person taking the action must publish on their website all plans and strategies within 3 months of each plan or strategy being approved.			
Indicator	**Independent Auditor Comments**	**Measurements Made**	**Verification Method**	**Compliance Finding**
3.1.1 The person taking the action must publish on their website all plans and strategies within 3 months of each plan or strategy being approved.		Viewed Air Quality Monitoring Plan on website at:http://www.defence.gov.au/AirCraftNoise/_Master/Docs/Environment/Air%20Quality%20Monitoring%20Plan.pdf	View on website and evidence of when it was uploaded	Compliance

EPBC Approval Condition Number 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.			
Criterion 4.1	The person taking the action must comply with any request from the Minister to make specified revisions to the management plans specified in the conditions and submit the revised management plans for the Minister's written approval.			
Indicator	**Independent Auditor Comments**	**Measurements Made**	**Verification Method**	**Compliance Finding**
4.1.1 The person taking the action must comply with any request from the Minister to make specified revisions to the management plans specified in the conditions and submit the revised management plans for the Minister's written approval	It was confirmed during the site audit by Mr Richard Poli (Regional Environment Manager) that there have been no requests in this regard.	Site audit interview with Mr Richard Poli (Regional Environment Manager)	Confirm if any requests have been made and if they have been made view correspondence and confirm they have been complied with by reviewing revised plans	Compliance
EPBC Approval Condition Number 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.			
Criterion 5.1	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.			

Indicator	Independent Auditor Comments	Measurements Made	Verification Method	Compliance Finding
5.1.1 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.	It was confirmed during the site audit by Mr Richard Poli (Regional Environment Manager) that there have been no activities required to be undertaken outside of what is within the Air Quality Monitoring Plan. As an observation in response to Condition 4 above, a few minor issues relating to the implementation of the approved Air Quality Monitoring Plan were identified by this audit. It is recommended that all the requirements specified in the Plan be implemented or the Plan be reviewed, updated and changes approved by the Minister.	Site audit interview with Mr Richard Poli (Regional Environment Manager)	Verify if the person taking the action has requested to carry out any activity other than in accordance with the management plans as specified in the conditions and if so, view correspondence	Not Applicable
Criterion 5.2	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.			

Indicator	Independent Auditor Comments	Measurements Made	Verification Method	Compliance Finding
5.2.1 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 per above not applicable		If the activity has been varied verify confirm that the management plans has been varied and approved and that this was completed before the varied activity commenced	Not Applicable
EPBC Approval Condition Number 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.			
Criterion 6.1	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.			
Indicator	**Independent Auditor Comments**	**Measurements Made**	**Verification Method**	**Compliance Finding**
6.1.1 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.		Reviewed all monitoring reports completed during the audit period. Each report confirmed that appropriate calibration and maintenance of monitoring equipment is undertaken in accordance with relevant	Confirm that during the audit period accurate records substantiating all activities associated with or relevant to the conditions of approval have been maintained and that these include measures taken to implement the	Compliance

		standards. Also viewed site maintenance and calibration logbook which is kept in the air quality monitoring station. Interview with Walter Manley (AECOM Technician) confirmed he has a thorough understanding of the requirements to ensure monitoring records are accurately recorded and maintained.	management plans Review monitoring records and reports prepared during the audit period	
Indicator	**Independent Auditor Comments**	**Measurements Made**	Verification Method	**Compliance Finding**
6.1.2 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.		All available records made available for this audit.	Records will be reviewed as part of this audit	Compliance

APPENDIX 3

Audit Checklist for Air Quality Monitoring Plan

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)				
Paragraph / Section	Summary of Commitments in AQMP	Compliance	Audit Evidence	Audit Recommendations
		Y = Compliance **N = Non-compliance** **NA = not applicable at time of audit** **U = Undertermined** **O = Observation**		
2	Plan to be submitted for approval by the Minister	Y	AQMP initially submitted 29 May 2012. Approval Letter dated 29 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	Y	This site/page could not be found when entered into an internet search engine. It was noited that this was also an issue picked up in Period 1 audit. The PER was available on the website at: http://www.defence.gov.au/AirCraftNoise/Environment/PublicEnvironmentR	Update Plan with current web location.
18	Repeat rainwater tank testing in 2012 or 2013, after the arrival of all 24 Super Hornets	NA	As per the approved plan rainwater tank testing was not proposed or required to be completed during the Period 2 audit period.	
19	Water sampling to be completed within a one week period preferably during dry conditions and analysed for the constituents detailed in the Plan	NA	As per the approved plan rainwater tank testing was not proposed or required to be completed during the Period 2 audit period.	
20	Results assessed against the guidelines detailed in the Plan	Y	For previous audit period (Period 1) Rainwater Tank Testing - Post Introduction Testing report (AECOM, 4 July 2014) sighted. Results assessed against the guidelines. As per the approved plan rainwater tank testing was not proposed or required to be completed during the Period 2 audit period.	
21	Establish air monitoring station/s near a sensitive receiver in close proximity to or on RAAF Base Amberley	Y	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. Monitoring station inspected during the audit site inspection.	The plan should be updated to include a figure that shows this location
22	Consultant engaged to determine monitoring station siting.	Y	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	Y	All available Air Quality Monitoring Reports reviewed for the audit period. Objectives listed in these reports 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	N	AECOM have been engaged for most of the audit period to conduct air quality monitoring in accordance with the plan. However it was identified that there was a period between June 2017 to June 2018 when monitoring was not completed as required. For the annual monitoring reports completed 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.	N	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.	N	Monitoring commenced in 2014. Monitoring was required to be completed for the duration of the audit period however as identified there was a period between June 2017 to June 2018 when monitoring was not completed as required.	

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)				
Paragraph / Section	**Summary of Commitments in AQMP**	**Compliance**	**Audit Evidence**	**Audit Recommendations**
27	If air quality values exceed objectives, Defence to work with relevant authorities to determine sources of pollution and reasonable mitigation measures.	NA	Air Quality Monitoring Reports available for the audit period report no exceedences of reporting guidelines or objectives.	
28	Second round of rainwater Tank testing planned for 2012 or 2013	NA	As per the approved plan rainwater tank testing was not proposed or required to be completed during the Period 2 audit period.	
29	Rainwater tank testing results posted on website and the Ipswich library. Copies provided to the public if requested	N	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	NA	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	N	Plan dated 9 October 2012 and is currently version 1.0. No evidence sighted that the Plan has been reviewed annually. This was also identifed by the previous audit (Period 1).	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.	NA	The Plan has not been revised.	
33	Independent audit of compliance in accordance with Condition 5 of the Approval	Y	Refer to main audit report for the details	
34	Environment Minister may request revisions to the Plan at any time in accordance with condition 7 of the Approval	NA	No revisions to the Plan requested (pers comms R Poli)	
35	Maintain accurate records associated with implementing the Plan and make them available to DSEWPaC (now DoE) or an independent auditor	Y	Records considered to be adequate.	

APPENDIX 4

Documentation Reviewed

RAAF BASE AMBERLEY INDEPENDENT COMPLIANCE AUDIT 2019

Table 1 - Documentation Received and Reviewed

Ref	Document
1	EPBC 2008/4410 as varied in April 2014
2	Previous independent audit report for Period 1 prepared by Umwelt dated January 2016
3	Public Environment Report – Supplementary Report (Nov 2009)
4	ASH Air Quality Monitoring Plan V.1.0 dated October 2012
5	ASH Air Quality Monitoring Plan letter of approval from DoE dated 29 April 2014
6	Correspondence regarding submission of AQMP for review and approval as required by Condition 4 of EPBC 2008/4410 as varied in April 2014
7	AECOM, May 2014 – Air Quality Monitoring Station Site Selection, Australian Super Hornets Flying Operations
8	Correspondence from Mr Lloyd Woodford at DEPA dated 9 March 2018 confirming that the Air Quality Monitoring Program is required to continue at RAAF Amberly through until 31 December 2018.
9	AECOM, March 2015 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – December 2014 to February 2015
10	AECOM, June 2015 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – March 2015 to May 2015
11	AECOM, September 2015 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – June 2015 to August 2015
12	AECOM, December 2015 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – September 2015 to November 2015
13	AECOM, March 2016 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – December 2015 to February 2016
14	AECOM, July 2016 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – March 2016 to May 2016
15	AECOM, September 2017 – Air Quality Monitoring Annual Report 3 for the Australian Super Hornet Flying Operations – June 2016 to May 2017
16	AECOM, February 2019 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – July 2018 to September 2018
17	AECOM, June 2019 – Air Quality Monitoring Quarterly Report for the Australian Super Hornet Flying Operations – October 2018 to December 2018
18	Amberley Consultative Working Group Minutes for audit period

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2019 Audit of ASH Conditions of Approval

Enclosure 2
to BP5431867
dated 22 Oct 19

Auditor's Findings

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. With the exception of the 12 months when monitoring was not undertaken the noncompliances identified were generally minor in nature or considered low risk. These matters can be easily rectified through implementing the recommendations outlined in this report.

Action Plan

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)

Paragraph / Section	Summary of Commitments in AQMP	Compliance	Audit Evidence	Audit Recommendations	Defence Remediation Action
		Y = Compliance **N = Non-compliance** **NA = not applicable at time of audit** **U = Undertermined** **O = Observation**			.
3	A copy of the PER can be found at http://www.airforce.gov.au/Aircraft/FlyingOperations.aspx	Y	This site/page could not be found when entered into an internet search engine. It was noited that this was also an issue picked up in Period 1 audit. The PER was available on the website at: http://www.defence.gov.au/AirCraftNoise/Environment/PublicEnvironmentReport.asp	Update Plan with current web location.	Spotless, on behalf of Defence, to request AECOM update the plan with current web location.
21	Establish air monitoring station/s near a sensitive receiver in close proximity to or on RAAF Base Amberley	Y	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. Monitoring station inspected during the audit site inspection.	The plan should be updated to include a figure that shows this location	Spotless, on behalf of Defence, to request AECOM update the plan with a figure that shows actual location of monitoring station.
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	N	AECOM have been engaged for most of the audit period to conduct air quality monitoring in accordance with the plan. However it was identified that there was a period between June 2017 to June 2018 when monitoring was not completed as required. For the annual monitoring reports completed section 7.0 contains a comparison against the PER predictions and air quality objectives.		DEPAC and AFHQ to negotiate a remedial course of action with DoEE. Defence will argue the monitoring to date is sufficient to verify the accuracy of PER predictions. An additional year of monitoring may otherwise be required in lieu of the period when monitoring was not completed.

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)

Paragraph / Section	Summary of Commitments in AQMP	Compliance	Audit Evidence	Audit Recommendations	Defence Remediation Action
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.	N	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.	Spotless, on behalf of Defence, to request AECOM update the Plan with current web location of monitoring reports. AFHQ to upload existing reports to website and table them at ACWG meeting. AFHQ to establish process for ensuring future reports are uploaded to website and tabled at future ACWG meetings.
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.	N	Monitoring commenced in 2014. Monitoring was required to be completed for the duration of the audit period however as identified there was a period between June 2017 to June 2018 when monitoring was not completed as required.		See item 24
29	Rainwater tank testing results posted on website and the Ipswich library. Copies provided to the public if requested	N	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.	Spotless, on behalf of Defence, to request AECOM update the Plan with current web location of tank testing results. AFHQ to post results to website and provide to Ipswich library.
31	Air Quality Monitoring Plan to be reviewed annually by Defence in the first quarter of each year in addition to the independent audits	N	Plan dated 9 October 2012 and is currently version 1.0. No evidence sighted that the Plan has been reviewed annually. This was also identifed by the previous audit (Period 1).	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.	AFHQ to initiate annual reviews in the first quarter of each calendar year.
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.	O	The Plan has not been revised.	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.	Actions to correct non-compliances require minor updates to the Plan. DEPAC to inform DoEE of changes and determine if Defence needs to submit updated Plan for Ministerial approval.
33	Independent audit of compliance in accordance with Condition 5 of the Approval	N	Refer to main audit report for the details		AFHQ to publish Period 1 and Period 2 audit reports on website and retain evidence of the publish dates.

Conditions of Approval 2008/4410 (23 April 2014)

Condition/ Indicator	Summary of Commitment	Compliance	Audit Evidence	Audit Recommendations	Defence Remediation Action

Air Quality Monitoring Plan V 1.0 (9 Oct 2012)

Paragraph / Section	Summary of Commitments in AQMP	Compliance	Audit Evidence	Audit Recommendations	Defence Remediation Action
		Y = Compliance **N = Non-compliance** **NA = not applicable at time of audit** **U = Undertermined** **O = Observation**			
4/1.3.1	The person taking the action must implement the approved Air Quality Monitoring Plan.	N	Reviewed monitoring reports completed during the audit period. It was identified that there was a period between June 2017 to June 2018 when monitoring was not completed. Section 25 of the plan requires that the air quality monitoring reports are tabled at the Amberley Consultative Working Group (ACWG) meetings. No evidence in minutes reviewed that the air quality monitoring reports are tabled at these meetings. Section 29 of the plan requires that rainwater tank testing results are posted on the website and provided at the Ipswich Library. This has not occurred. Section 31 of the plan states that the plan will be reviewed annually in the first quarter of each year. This has not occurred, and it is noted that the plan has not be revised since it was prepared in October 2012.	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 plan would benefit from a thorough revision to ensure all details within it are up to date and to reflect what is intended to be conducted in order to a maintain compliance with Condition 4. All reports required to be made available on the web should be uploaded and air quality monitoring reports should be tabled at the Amberley Consultative Working Group meetings.	Addressed by actions against non-compliances listed above in table *Air Quality Monitoring Plan V 1.0 (9 Oct 2012)*
5/2.2.1	Each auditor's report must be submitted to the Minister within 6 months of the end of the period to which the report applies	N	The Period 1 audit report was not finalised until January 2016. This was not within 6 months of the end of the period to which the report applied as required.	It is recommended that this current audit report as completed for Period 2 be submitted to the Minister as required by 30 June 2019.	AFHQ to provide DEPAC with current audit in time to submit to DoEE by the due date.
5/2.2.2	Each auditor's report must be published on the website of the person taking the action within 3 months of the report being submitted to the Minister.	N	The previous audit report for Period 1 is not published on the Amberley website	It is recommended that the previous audit report for Period 1 be published on the web and that once completed and submitted that this current audit report be published.	AFHQ to update website with links to previous audit report. The current audit report will also be uploaded.