



Australian Government
Defence

Department of Defence Annual Compliance Report 2025

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





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Document Version Control

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Declaration of Accuracy

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

Signed

| | |
|--|--|
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1 Description of Activities

The Cultana Expansion Area (CEA) project comprised the expansion of the Cultana Training Area (CUTA) in South Australia westwards from 50,250 hectares to approx 209,294 hectares, through the acquisition of pastoral leases in the early 2010s. In 2023/24, the CEA was reduced to approx 150,600 hectares as part of a Commonwealth land swap with South Australian government.

The original expansion project was assessed under the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act), as described in Part 7 of the Referral submitted to the Environment Department on 23 December 2009 (EPBC referral number 2010/5316).

A Public Environment Report (PER) process occurred for the project in accordance with Part 8 of the EPBC Act. The PER provided information about the likely impacts of the project on relevant controlling provisions under the EPBC Act including nationally listed threatened species and ecological communities (sections 18 & 18A) and protection of the environment from Commonwealth action (section 28).

The CEA project was approved subject to conditions under Part 9 of the Act by the (now) Department of Climate Change, the Environment and Water (DCCEEW) on 5 December 2013. Defence's use of the CEA is also subject to the environmental management requirements of the South Australian Government, made legally enforceable under a lease agreement made with Defence.

Condition 18 requires the preparation and submission of an annual compliance report within three months of every 12-month anniversary of the *commencement* of the action for the duration of the approval that remains in effect to 31 December 2114.

The action commenced on 9 October 2015 and the first annual compliance report was submitted on 9 January 2017. Annual reports for the CEA are due each year by 9 January and address compliance for the preceding year. This report is the ninth annual compliance report for the CEA project and provides information on activities undertaken in 2024 to address compliance with the conditions of approval.

Measures have been incorporated into the CEA Environmental Management System (EMS), Environmental Management Framework (EMF), Environmental Management Plan (EMP) and environmental management program for the site to address the EPBC Act approval conditions. These were formally endorsed by the South Australian Government in March 2016 and guide the use and environmental management of the site.

The referred project involved the expansion of the existing Cultana Training Area located near Whyalla, South Australia. The CEA's total area of CUTA increased from 50,250 hectares to approx 209,294 hectares through the acquisition of pastoral leases and the subsequent grant by the South Australian Government of a Miscellaneous Lease for Defence Purposes (MLDP).

The expansion of the CUTA fulfils the following objectives:

- employment of a wide range of Army and Royal Australian Air Force (RAAF) individual or vehicle mounted weapons systems and platforms;
- development of a combined arms training area of sufficient size to allow Army and RAAF to train together;
- development of an all-weather training area of sufficient size that is easily accessible by both Darwin and Adelaide Army units and can be used during northern Australia's wet season, during which Defence training areas in the Northern Territory are closed;
- development of a training area to support the Army's force generation cycle and foundation warfighting requirements;
- individual and collective training that underpins operational capability;
- development of a training area of sufficient size to allow training activities to be rotated, and areas of land rested to facilitate sustainable use of the training area; and
- development of a training area sufficiently close to a fully equipped hospital to allow personnel to be evacuated within one hour of a medical emergency occurring.

Since acquiring the land, Defence has developed a range of new facilities (fences, gates, internal roads, camps, range control, etc.) and military training has been conducted.

The CEA is a key training area for supporting the pre-deployment training of Australian Defence Force personnel. The expanded training area is expected to contribute to the Australian Defence Force's training needs for the next 75 to 100 years.

In 2023, the Acting Prime Minister and Minister for Defence, Richard Marles, and Premier of South Australia (SA), Peter Malinauskas, signed a Cooperation Agreement. As part of the Agreement, a land exchange as well as appropriate easement and access arrangements in relation to Defence owned and leased land at Cultana was undertaken on 25 June 2024. The Cultana Expansion Area land area has now been reduced to 150,600 ha, with the total Cultana Training Area now approx 200,555 ha. The nature and character of the action has not changed.

1.1 Summary of 2024 Incident Reporting

Ten (10) environmental incidents occurred and were reported in 2024. Of these, seven occurred during Exercise Rhinos Run and two were associated with project delivery by external contractors. All incidents have been investigated, reviewed and suitably remediated (where required) and closed. With the exception of the IRA incursion where Defence is awaiting a written response from Barngarla Determination Aboriginal Corporation (BDAC).

1. Boundary exclusion incursion APX 7 – Army Exercise – May 2024. Submitted on the Defence Garrison and Estate Management System (GEMS) (Incident ID 1396)

2. Boundary exclusion incursion APX 9 – Army Exercise – May 2024. Submitted on GEMS (Incident ID 1397).

Summary for both Boundary Incursion reports:

- Vehicles driven on 1km boundary exclusion area. No dust complaints received.
- Lessons learned session conducted by E&S with exercise planners.

3. Excavation location deviation from ECC (1) – Army Exercise – May 2024. Submitted on GEMS (Incident ID 1400).

4. Excavation location deviation from ECC (2) – Army Exercise – May 2024. Submitted on GEMS (Incident ID 1401).

5. Excavation location deviation from ECC (3) – Army Exercise – May 2024. Submitted on GEMS (Incident ID 1402).

6. Excavation location deviation from ECC (4) – Army Exercise – May 2024. Submitted on GEMS (Incident ID 1403).

Summary for all four (4) unauthorised excavation sites:

- Excavations where made deviating from ECC approved locations.
- Lessons learned session conducted by E&S with exercise planners
- Areas remediated well with significant impact highly unlikely. Ongoing monitoring of remediated excavation sites to ensure suitable regeneration occurs.

7. Indigenous Restricted Area (IRA) incursion – Army Exercise – May 2024. Submitted on GEMS (Incident ID 1398).

- Vehicles entered site during night manoeuvres and upon realising immediately reversed in the same direction as they had entered.
- Incursion reported to BDAC.
- Verbal response received indicating no further action required by Defence. Awaiting written confirmation from BDAC.

8. Project related – Waste management issue – identified June 2024. Submitted on GEMS (Incident ID 1395).

- The management of vegetative waste for this project did not meet Defence policy and the projects CEMP requirements.
- Vegetative waste disposal mismanaged by contractor. Notice of non-complying activity issued to the contractor, which notifies that parts of the Contractor's Activities, were not delivered in accordance with the Contract.

9. Project related – Administrative non-compliance – Finalised June 2024. Submitted on GEMS (Incident ID 1372).

- ECC and CEMP were not updated to capture amended actions and therefore were non-compliant. No environmental issues identified.
- Notice of non-complying activity issued to the subcontractor.

10. Diesel spill - July 2024. Submitted on the Defence Garrison and Estate Management System (GEMS) (Incident ID 1426).

- Diesel tanker leaked during construction activities. Contained to the bitumen road at El Alamein. Absorbent material applied and then bagged and disposed appropriately offsite.

2 Conditions of Approval

Table 1 – Compliance Table

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
|------------------|--|---|--|
| 1 | <p>Prohibited activities</p> <p>No chemical, biological, radioactive or nuclear weapons may be taken onto or used within the boundaries of the CEA.</p> | Compliant | Chemical, biological, radioactive or nuclear weapons are not approved for use on Defence training areas. The Cultana Training Area Standing Orders (TASOs) include instructions addressing prohibited activities and what can be taken onto or used within the boundaries of the training area. |
| 2 | <p>Stakeholder engagement</p> <p>By 1 July 2024 the approval holder must publish a webpage to enable the community to make comment and raise issues regarding environmental matters associated with the CEA. This webpage may also cover the adjoining Cultana Training Area. The approval holder must maintain this webpage, and ensure it remains published on the website, until the expiry date of this approval.</p> <p>This webpage must:</p> <ul style="list-style-type: none"> a) be easily accessible and easily found by members of the public, and b) provide a direct means of communication between the public | Compliant | The website was published before 1 July 2024 and is found here: https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area . To date, no correspondence or notifications have been received and no issues have been raised. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
|------------------|---|---|---|
| | <p>and the approval holder.</p> <p>The approval holder must record details of all correspondence received, and contact details of the correspondent (where provided), and record all responses sent from the approval holder to the correspondent, including the date of the reply.</p> <p>The approval holder must provide a summary of all correspondence received as part of the annual compliance report required by condition 18 of this approval, in accordance with relevant privacy considerations. This summary should include environmental management actions that have been identified to address issues raised.</p> <p>The summary must provide evidence of active and timely engagement with the community to resolve open issues which remain under consideration.</p> | | |
| 3 | The approval holder must establish, maintain and advertise protocols for receiving, managing and resolving complaints in a timely and transparent manner. The protocols must be established prior to commencement of the action. | Compliant | <p>Activities at the CEA are promoted through Defence media releases, public notifications via local and State media, and Defence website Army 'Noise and Training Notices' https://www.army.gov.au/our-news/noise-and-training-notice. Noise and Training Notices are published monthly on the Army – News and Events.</p> <p>The Directorate of Operations and Training Area</p> |

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|------------------|---|---|---|
| | The means to lodge a complaint in accordance with these protocols must appear on the webpage as required by condition 2 of this approval, and the means to lodge a complaint (or a link to the relevant part of the website) must appear on that webpage alongside the means to provide environmental management input. | | <p>Management advertises in the local papers for Whyalla and Port Augusta; Whyalla News and The Transcontinental respectively.</p> <p>If the public has any concerns, inquiries or complaints about the CEA, they can call the National Defence Switchboard (1300 333 362) and be connected to their nearest base (RAAF Base Edinburgh is closest to CEA) or contact Defence via https://www1.defence.gov.au/about/contact-us.</p> <p>Defence maintains a centralised set of protocols and processes to record, process and investigate complaints in the Defence GEMS, an online SAP-based system that provides a single source of information for all estate management activities.</p> <p>No complaints were reported in 2024.</p> |
| 4 | <p>Environmental Management Framework</p> <p>The approval holder must establish and implement an environmental management system (EMS) for the CEA, consistent with <i>ISO 14001</i>. The EMS must include an overarching document that:</p> <p>a) describes the interaction between elements of the EMS including the Defence Environmental Management Framework, and specific plans relevant</p> | Compliant | <p>As part of the EMF for the CEA, Defence operates an EMS consistent with ISO 14001. The EMS and accompanying EMP address the requirements of this condition and are available here: https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area.</p> <p>The EMS was developed in close consultation with representatives of the South Australian Minister for Environment and was endorsed by the SA Government on 29 March 2016. In addition to intergovernmental cooperation in developing the EMS, community</p> |

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| | <p>to the CEA as well as other elements of the CEA environmental management framework;</p> <p>b) identifies roles and responsibilities for implementation of the elements of the EMS; and</p> <p>c) describes arrangements for ongoing review (and revision as necessary) of elements of the EMS.</p> <p>Note: The Department understands that Defence may wish to amalgamate EMS documents relating to several individual sites. This condition would not preclude that approach, provided that commitments made in relation to the CEA are clearly identifiable, and that the conditions of approval are satisfied in full.</p> | | <p>consultation occurred through the Cultana EAC. The EMS and EMP documents were distributed to EAC members in March 2016, including local councils, Aboriginal groups and community representatives.</p> <p>The Defence GEMS supports the implementation of the EMS at CEA. GEMS provides a repository for environmental data and informs on-ground environmental management. It enables a single, integrated environmental management tool to fulfil the requirements of the lease with the South Australian Government and the EPBC Act conditions of approval. It combines overarching management actions with matter-specific actions and helps monitor impacts and variations associated with the change from pastoral to Defence use.</p> <p>Defence completed the required Bushfire Management Plan (BMP) update in accordance with the EMP. Chapter 5, 'Cultana Training Area (CUTA) BMP 2016-2018' was replaced by the BMP (2019).</p> <p>An updated and revised Cultana EMP was submitted to DCCEEW on 12 December 2023. Defence and DCCEEW are currently working to ensure that the revised EMP satisfies all approval conditions.</p> |
| 5 | The approval holder must prepare and implement operational controls that reduce environmental impacts and maintain public amenity and safety. The operational controls must address at | Compliant | <p>A range of operational controls has been implemented at the CEA to reduce environmental impacts and maintain public amenity and safety.</p> <p>The primary operational controls include the EMF, EMP, the Defence ECC process (compliance controls), Standard</p> |

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| | <p>least the following public amenity matters:</p> <p>a) firing of projectiles from, into or within the CEA over any public road or railway or any other area occupied by civilians;</p> <p>b) noise, noting that training activities may occur at night;</p> <p>c) transport of equipment and personnel to, from and within the CEA;</p> <p>d) dust and smoke;</p> <p>e) electro-magnetic frequency interference (including electronic warfare activities); and</p> <p>f) light spill (including laser technologies).</p> <p>Specific operational controls must be made available to the Department upon request. The approval holder must, upon request, demonstrate to the Minister that the operational controls provide for public safety from these matters.</p> | | <p>Operating Procedures and TASOs. When and where relevant to particular matters - safety templates and roads, perimeter fencing, firebreaks and warning signs, Emergency Services contacts, local media and Defence web pages, community engagement and information opportunities are also used.</p> <p>In response to the specific requirements of this condition the following controls are in place:</p> <p>a) TASOs cover firing procedures, permitted areas for firing and prohibited firing areas from, into or within the CEA.</p> <p>b) Noise is addressed in Chapter 6.2 of the EMP. Operational measures include establishing buffers between the noise source and sensitive receptors, such as residences. Buffers can be reduced or increased in accordance with equipment being used.</p> <p>c) Vehicle road movements and crossings are undertaken at times with the least amount of public traffic on roads. The TASOs set restrictions on off-road movement and prescribe speed limits to help dust suppression. Department of Planning Transport and Infrastructure and South Australian Police traffic management are engaged as required; signs are also put in place when necessary.</p> <p>d) The dust management procedures are included in Chapter 6.3 of the EMP. Dust is managed via a combination of a 1 km vehicle movement buffer along roadsides and boundaries. Time lapse cameras operate to monitor dust and wetting and binding applications are</p> |

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| | | | <p>used if required. Dust management is also adaptive according to climatic conditions. If strong winds are likely to send dust clouds towards a road then the buffer size is increased or training moved to another location.</p> <p>e) In accordance with the <i>Radiocommunications Act 1992</i>, specific radiofrequency (RF) bands are designated to be used for national defence. The draft Defence Electromagnetic Spectrum Manual governs Defence's use of the radiofrequency (RF) spectrum and includes consideration of public amenity and safety. This draft publication will replace the Defence Spectrum Manual (SPECMAN). The update is primarily structural and the content regarding the use of RF bands, public amenity and safety remains unchanged.</p> <p>f) Chapter 6.2.3 of the EMP details the management of light impacts at CUTA, including the use of lasers. The use of laser technologies at Defence training areas is further addressed in Annex 6B of the Defence Radiation Safety Manual.</p> |
| 6 | <p>Management plans</p> <p>The approval holder must, within twelve (12) months of the commencement of the action, provide the Minister with a threatened species habitat management plan (TSHMP), prepared by a suitably qualified expert. The TSHMP must identify specific areas of important habitat and / or known occurrence of threatened</p> | Compliant | <p>A TSHMP addressing the requirements of this condition was included in the EMP (Chapter 3.4) and submitted to Environment on 7 October 2016. The only known EPBC Act listed resident threatened species at CEA is Western Grasswren/Thick-billed Grasswren (Gawler Ranges subspecies) (<i>Amytornis textilis myall</i>). There is also one State listed threatened species, Sandalwood (<i>Santalum spicatum</i>).</p> <p>In 2023, Southern Whiteface (<i>Aphelocephala leucopsis</i>)</p> |

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| | <p>species within the CEA and describe how those areas will be managed for the protection of those species. The TSHMP must make reference to any relevant conservation advices or recovery plans approved under the EPBC Act.</p> <p>Once approved by the Minister, the TSHMP must be implemented. Any work undertaken prior to the Minister's approval of the TSHMP must be preceded by a pre-activity survey for all threatened species and, if any are detected, relevant work may not proceed until the TSHMP is approved.</p> <p>At least once every ten (10) years, the TSHMP must be reviewed and updated as required in consideration of all available sustainability monitoring reports (refer Condition 12), and provided to the Minister for approval. The revised TSHMP must not be implemented until it has been approved by the Minister.</p> <p>Note: This condition may be satisfied by a single document, or separate documents dealing with individual species or groups of species.</p> | | <p>was assessed to be eligible for listing as Vulnerable under the EPBC Act. Records of the Red-lored Whistler (<i>Pachycephala rufouularis</i>) and Blue-winged Parrot (<i>Neophema chrysostoma</i>) and the Southern Whiteface are available. Defence has recently completed (October 2024) a bird/habitat survey to have a better understanding of the presence of these species in the CEA. This monitoring will further assist to identify and manage habitat for the threatened species.</p> <p>The management of threatened species and their habitat is outlined in Chapter 3.4 of the EMP. Broader biodiversity management is also addressed in Chapters 2, 3 and 4 of the EMP.</p> <p>An updated and revised Cultana EMP was submitted to DCCEEW on 12 December 2023. Defence and DCCEEW are currently working to ensure that the revised EMP satisfies all approval conditions.</p> <p>An independent 5-yearly performance report completed by AECOM (managed by JLL) (Attachment A), reflects that:</p> <ul style="list-style-type: none"> • Defence has successfully undertaken required monitoring; • Managed ecosystem health effectively; • Ecosystem health has improved during the reporting period; and • Defence has met its environmental monitoring obligations specified in the MLDP. |

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| | | | This independent 5-yearly performance report was provided to the SA Government in December 2023. |
| 7 | <p>The approval holder must, within twelve (12) months of the commencement (of the action, provide the Minister with a biosecurity and overabundant native species management plan (BONSMP), prepared by a suitably qualified expert. The BONSMP must describe measures to monitor and control animal pests, weeds and pathogens, including but not limited to the following species, within the CEA:</p> <ul style="list-style-type: none"> • Feral Cat (<i>Felis catus</i>) • Red Fox (<i>Vulpes vulpes</i>) • Feral Goat (<i>Capra hircus</i>) • Rabbit (<i>Oryctolagus cuniculus</i>) • Rodents (<i>non-native Mus and Rattus spp.</i>) • tramp ants • Buffel Grass (<i>Cenchrus ciliaris</i>) • Carrion Flower (<i>Orbea variegata</i>) <p>The BONSMP must make reference to any relevant threat abatement plans</p> | Compliant | <p>A BONSMP addressing the requirements of this condition was included in Chapter 4.2 of the EMP was submitted to the Environment Department on 7 October 2016.</p> <p>Weeds are mapped annually and ground-truthing occurs along the tracks to monitor effectiveness. New Carrion flower populations were identified in 2024. However, three populations have now been eradicated.</p> <p>Wild goat management was conducted in 2024 with 518 goats removed from January to November 2024. This accounts for a significant increase in numbers removed from the previous reporting period.</p> <p>Felixer technology has been in use in 2024 (Jan-Oct) to manage Feral Cat and Fox populations with 5 Cats and 17 Foxes targeted. Integrated management also includes 1080 baiting and den destruction.</p> <p>The Cultana EMP was updated and submitted to DCCEEW on 12 December 2023.</p> <p>An independent 5-yearly performance report completed by AECOM (managed by JLL) found at Attachment A, reflects that:</p> <ul style="list-style-type: none"> • Defence has successfully undertaken required monitoring; • Managed ecosystem health effectively; • Ecosystem health has improved during the |

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| | <p>approved under the EPBC Act.</p> <p>Once approved, by the Minister, the BONSMP must be implemented. Any work undertaken prior to the Minister's approval of the BONSMP, must have clear and effective protocols in place to monitor and control animal pests, weeds and pathogens. These protocols must be provided to the Minister upon request.</p> | | <p>reporting period; and</p> <ul style="list-style-type: none"> Defence has met its environmental monitoring obligations specified in the MLDP. <p>This independent 5-yearly performance report was provided to the SA Government in December 2023.</p> |
| 8 | <p>The approval holder must, within twelve (12) months of the commencement of the action, provide the Minister with a pollution prevention and contamination management plan (PPCMP), prepared by a suitably qualified expert. The PPCMP must address at least the following matters in relation to the CEA:</p> <p>a) identification of, and management prescriptions for, existing contamination by waste fuels and other hazardous and toxic substances.</p> <p>b) protocols for the safe storage, handling, use, transport and disposal of fuels and other anticipated hazardous and toxic substances;</p> <p>c) measures for monitoring contamination against known baselines, making reference to any applicable Australian</p> | Compliant | <p>A PPCMP addressing the requirements of this condition was included in the EMP submitted to the Environment Department on 7 October 2016.</p> <p>Established protocols are in place to address specific requirements for items a) and d) to prevent pollution, and monitor and manage existing minor contamination previously identified at CUTA (refer to Chapter 6). Defence conducted primary and detailed site investigations in accordance with Chapter 6 of the PPCMP in 2019.</p> |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
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| | <p>standards; and</p> <p>d) contingency measures for reporting, containing and remediating spills and other accidental pollution events.</p> <p>Once approved by the Minister, the PPCMP must be implemented. Any work undertaken Prior to the Minister's approval of the PPCMP, must have clear and effective protocols in place to prevent pollution and manage contamination consistent with the requirements of 8a) to 8d) above. These protocols must be provided to the Minister upon request.</p> <p>Material described in 8a) above must be provided to the Minister within twenty-four (24) months of commencement of the action.</p> | | |
| 9 | <p>Within six (6) months of commencement of the action, the approval holder must provide evidence to the Department that the following organisations have been consulted in relation to transport management, and that any concerns raised have been addressed, through the CEA environmental management framework:</p> <ul style="list-style-type: none"> Civil Aviation Safety Authority, in | Compliant | The PER provided information about consultation with relevant organisations. Liaison with the organisations now occurs as and when necessary. |

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| | <p>relation to airspace management;</p> <ul style="list-style-type: none"> • South Australian Department of Planning, Transport and Infrastructure; • Port Augusta City Council, in relation to local road traffic; • Whyalla City Council, in relation to local road traffic; and • Royal Flying Doctor Service, in relation to their operational needs. <p>Note: The Department acknowledges that in some cases consultation may already have occurred.</p> | | |
| 10 | <p>Environmental planning framework</p> <p>Construction and training activities may only be undertaken in accordance with the Defence environmental assessment process as described in the PER and with reference to the CEA environmental management framework. If an environmental assessment identifies any residual impacts on matters protected under the EPBC Act, the approval holder must provide to the Minister for approval:</p> <ul style="list-style-type: none"> • a report of the environmental | Compliant | <p>Defence applied the environmental assessment processes described in the PER to construction and continues to do so for training activities at the CEA.</p> <p>In 2024, 38 military training activities were conducted. Incidents relating to training are described on pages 2 and 3 of this report. No residual impacts on matters protected under the EPBC Act were identified.</p> |

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| | <p>assessment in question including a copy of Defence's environmental assessment;</p> <ul style="list-style-type: none"> the corresponding construction environmental management plan (CEMP) if one has been prepared; and an evaluation, with reference to the EPBC Act offset policy, of whether any offset (compensation) is required. <p>Where an offset is required, the approval holder must prepare an environmental offset strategy (EOS) in accordance with the EPBC Act offsets policy and in consultation with the relevant agencies within the South Australian Government.</p> <p>The construction or training activity must not commence until the Minister has approved it on the basis of any environmental assessment, CEMP or EOS provided, and imposed any additional environmental protection measures that are deemed necessary. Such plans and measures must be implemented as approved.</p> | | |
| 11 | <p>Monitoring and reporting</p> <p>The approval holder must engage a</p> | Compliant | An Environmental Baseline Condition Report (EBCR) addressing the requirements of this condition was |

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| | <p><i>suitably qualified expert</i> to prepare an environmental baseline condition report (EBCR). The EBCR must describe the condition of the environment at <i>the CEA</i> at the <i>commencement</i> of the action at least in the following terms:</p> <p>a) comprehensive ground-truthed mapping of vegetation communities, using a relevant regional or statewide vegetation classification system;</p> <p>b) descriptions of all vegetation communities occurring within <i>the CEA</i>, including information on key species, conservation status, soil, geographic and climatic preferences, relevant threats and general condition;</p> <p>c) comprehensive ground-truthed mapping of environmentally sensitive features including claypans, contaminated sites and highly erodible or saline soils;</p> <p>d) comprehensive ground-truthed mapping of waterbodies and watercourses (including floodplains) within <i>the CEA</i>;</p> <p>e) comprehensive mapping (unless culturally inappropriate) of culturally significant sites and areas, based on</p> | | <p>submitted to the Environment Department in October 2016 and is available on the Defence Environmental Compliance Reporting website: https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area.</p> <p>Surveying was undertaken in 2019 to assess land degradation (bare earth). A combination of ground-truthing and remote sensing was used to identify any areas within the CEA requiring rehabilitation or restoration.</p> <p>The report was finalised and signed in 2020. Only minor impacts from training activities, comprising some new vehicle tracks, were detected.</p> <p>No surveying for land degradation was required in 2024.</p> <p>The Cultural Heritage Signage Project was completed within the CEA. The new signage indicates no go areas in order to protect the culturally significant sites.</p> |

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| | <p>local, state and Commonwealth heritage databases as well as consultation with relevant traditional owners;</p> <p>f) identification of all weeds and pests identified on the site, and mapping of the distribution of prescribed / listed and major pest and weed populations;</p> <p>g) an inventory of all species known to occur within the CEA; and</p> <p>h) descriptions, justifications and limitations (eg. due to climatic conditions) of survey methodology employed.</p> <p>The EBCR must be provided to the Minister within twenty-four (24) months of the complete acquisition of the CEA. No native vegetation may be cleared without having been surveyed.</p> | | |
| 12 | <p>The approval holder must, within twelve (12) months of the commencement of the action, provide the Minister with a sustainability monitoring and reporting plan (SMRP) for the CEA. The SMRP must be prepared with reference to the EBCR (see Condition 11) and must include:</p> <p>a) clearly defined thresholds and</p> | Compliant | <p>A SMRP addressing the requirements of this condition was included in the EMP submitted to the Environment Department on 7 October 2016.</p> <p>Specifically, Chapter 10 of the EMP outlines the SMRP and combines monitoring and reporting of all key sustainability measures into a snapshot of performance against standards and thresholds established in the EMP.</p> <p>Monitoring activities identified in the SMRP at Chapter 10</p> |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
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| | <p>indicators including occurrence, extent, abundance and condition for the following parameters:</p> <ul style="list-style-type: none"> i) soil; ii) water; iii) air; iv) noise; v) threatened species vi) animal pests, weeds and pathogens; and vii) indigenous and non-indigenous heritage; <p>b) establishment of a representative network of longitudinal reference sites;</p> <p>c) establishment of a periodic vegetation remapping regime (at least every ten (10) years);</p> <p>d) a clearly articulated 'rest and rotation' policy for the protection of areas potentially damaged by overuse;</p> <p>e) descriptions and justifications of survey methodology to be employed;</p> <p>f) a recovery planning process linked to the thresholds and indicators defined</p> | | <p>of the EMP include Jessup transects, which were undertaken in 2021. These transects measure vegetation density, cover and condition. Increases in density thresholds were observed for Bluebush, Saltbush and Perennial shrubs on the site. The density of vegetation on the site is now greater than noted in the EMP. Jessup transects are scheduled to be conducted every 5 years and planning is in place for the transects to be conducted in 2025.</p> |

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| | <p>in 12 a) above; and</p> <p>g) a requirement for the preparation of annual sustainability monitoring reports on implementation of the SMRP (including any management responses undertaken or intended).</p> <p>Once approved by the Minister, the SMRP must be implemented. Any work undertaken prior to the Minister's approval of the SMRP must have clear and effective protocols in place to monitor the parameters in 12a) above and this information must be included in any reporting on the SMRP.</p> | | |
| 13 | <p>Sustainability monitoring reports must be provided to the Minister annually within ten (10) business days of their finalisation, and must be permanently published at a suitable location on the internet within one (1) month of their finalisation.</p> | Compliant | <p>The SMRP for the CEA was provided to the Environment Department on 7 October 2016, as part of the EMP (Chapter 10).</p> <p>An updated and revised Cultana EMP was submitted to DCCEEW on 12 December 2023. Defence and DCCEEW are currently working to ensure that the revised EMP satisfies all approval conditions.</p> <p>An independent 5-yearly performance report completed by AECOM (managed by JLL) found at Attachment A, reflects that:</p> <ul style="list-style-type: none"> Defence has successfully undertaken required monitoring; |

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| | | | <ul style="list-style-type: none"> Managed ecosystem health effectively; Ecosystem health has improved during the reporting period; and Defence has met its environmental monitoring obligations specified in the MLDP. <p>This independent 5-yearly performance report was provided to the SA Government in December 2023.</p> |
| 14 | <p>Miscellaneous environmental management</p> <p>Prior to any commencement of the action, the approval holder must provide the Department with a copy of the CEA lease agreement</p> <p>Note: The conditions of approval have been prepared in consideration of a draft of the agreement described above.</p> <p>Substantial deviations from this draft may result in variations to the conditions of approval under Section 143 of the EPBC Act.</p> | Compliant | A copy of the signed MLDP was provided to the Environment Department on 30 July 2014 prior to commencement of the action on 9 October 2015. |
| 15 | <p>The following environmental themes must be managed in accordance with the CEA lease Agreement:</p> <ul style="list-style-type: none"> flora and fauna (except for threatened species as defined for | Compliant | <p>The site is being managed in accordance with the MLDP issued by the South Australian Government.</p> <p>Defence submitted environmental management documentation for the CEA to the South Australian Government, which was endorsed in March 2016.</p> |

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| | <p>the purposes of these conditions);</p> <ul style="list-style-type: none"> • bushfire; • water conservation; • noise and vibration; • air and water pollution; and • decommissioning and closure. <p>Any documents required in accordance with the CEA lease agreement must be provided to the Department upon request.</p> | | <p>All CEA environmental management activities are required to comply with the requirements of the CEA MLDP.</p> <p>Defence completed the required Bushfire Management Plan (BMP) update in accordance with the EMP. Chapter 5, 'Cultana Training Area (CUTA) BMP 2016-2018' was updated and replaced by the BMP (2019).</p> <p>All CEA Bushfire Management Plan requirements were completed prior to 1 November 2020. Fire breaks comply with the requirements of the CEA MLDP.</p> |
| 16 | <p>Administrative conditions</p> <p>Within fourteen (14) days after the commencement of the action, the approval holder must advise the Department in writing of the actual date of commencement'.</p> | Compliant | <p>Actions involving the demolition of redundant structures commenced on 9 October 2015. The Environment Department was notified on 3 November 2015.</p> |
| 17 | <p>The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement all management documents required by this approval, and make them available upon request to the Department. Such records may be subject to audit by the</p> | Compliant | <p>The Defence GEMS is used as a centralised set of protocols and processes to record, process and investigate complaints (refer to condition 3).</p> <p>All Defence reports and management documents relevant to the implementation of conditional approvals that are required to be made available for public access are published on the Defence environmental compliance website at: https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-</p> |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
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| | 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. | | cultana-training-area |
| 18 | <p>Within three months of every 12 month anniversary of the commencement of the action, the approval holder must publish a report on their website addressing compliance with each of the conditions of approval, including implementation of any management documents as specified in the conditions of approval.</p> <p>Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of approval must be provided to the Department at the same time as the compliance report is published.</p> <p>Note: To facilitate administration, this requirement may be addressed concurrently with the annual sustainability monitoring reporting process described in</p> | Compliant | <p>Department of Defence submitted the first Annual Environmental Compliance Report for the Cultana Expansion Area to Environment Department in January 2017 (which reported on activities undertaken 2016).</p> <p>This Annual Compliance Report is the ninth report, submitted by the due date of 9 January 2025. Annual Compliance Reports are published on Defence's Environmental Compliance Reporting website at: https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area</p> |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
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| | Conditions 12 and 13. | | |
| 19 | Upon the direction of the Minister , the approval holder must ensure that an independent audit of compliance with the conditions of approval is conducted and a report submitted to the Minister . The independent auditor must be approved by the Minister prior to the commencement of the audit. Audit criteria must be agreed to by the Minister and the audit report must address the criteria to the satisfaction of the Minister . | Not applicable | Not triggered. |
| 20 | If the approval holder wishes to carry out any activity otherwise than in accordance with a management document specified in the conditions of approval, the approval holder must submit to the Department for the Minister's written approval a revised version of that management document . The varied activity shall not commence until the Minister has approved the varied management document in writing. The Minister will not approve a varied management document unless the revised management document would result in an equivalent or improved environmental outcome over time. If the Minister approves the revised | Not applicable | Not required. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
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| | <i>management document</i> , that <i>management document</i> must be implemented in place of the <i>management document</i> originally approved. | | |
| 21 | If the Minister believes that it is necessary or convenient for the better protection of the environment to do so, the Minister may request that the approval holder make specified revisions to <i>management documents</i> specified in the conditions of approval and submit the revised management documents for the Minister's written approval. The approval holder must comply with any such request. The revised approved management documents must be implemented. Unless the Minister has approved the revised <i>management document</i> , then the approval holder must continue to implement the <i>management document</i> originally approved, as specified in the conditions of approval. | Not applicable | Not required. |
| 22 | If, at any time after five (5) years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not substantially commence the action | Not applicable | The action commenced on 9 October 2015. |

| Condition Number | Condition | Is the project compliant with this condition? | Evidence Comments |
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| | without the written agreement of <i>the Minister.</i> | | |
| 23 | Unless otherwise agreed to in writing by <i>the Minister</i> , the approval holder must publish all <i>management documents</i> referred to in the conditions of approval on their website. Each <i>management document</i> must be published on the website within one (1) month of being approved. | Compliant | Management Plans and other documents are made publicly available on Defence's Environmental Compliance Reporting website at: https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area |

3 Correcting Non-Compliances

No non-compliances identified by the project.

4 New Environmental Risks

No new environmental risks were observed for the approved action.