

Annual Compliance Report 2025

EPBC Act Approval 2023/09649

Blamey Barracks Kapooka Redevelopment Project

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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

Full name:	Matthew Plunkett
Position (please print):	Ag/ Director, Environmental Planning, Assessment and Compliance
Organisation (please print including ABN/ACN if applicable):	Department of Defence ABN: 68 706 814 312
Date:	December 2025

1. Description of Activities

Background information

Department of Defence (Defence) referred Blamey Barracks Kapooka Redevelopment Project (BBK) for consideration under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). On 21 December 2023, a delegate of the Minister for the Environment and Water determined that the proposed action by Defence involving vegetation clearing and earthworks at BBK is a controlled action.

The action was determined a controlled action under section 130(1), 133(1), 134(1A) and sections 18A and 28 of the EPBC Act (protection of the environment from Commonwealth actions). An assessment was conducted, and the action was approved on 06 December 2024 subject to conditions attached to the approval, EPBC Approval 2023/09649.

Condition 33 of EPBC Act approval 2023/09649 requires an annual compliance report to be published on Defence's website within 12 months from 06 December each year. The annual report must address Defence compliance with the conditions of this approval over the previous 12 months. This includes the implementation of any management plans and strategies required in the conditions of the approval which is in effect until 31 December 2046. No action has been commenced in the "Action Area".

This is the first annual compliance report (ACR) submitted for BBK. The report will be published on the Defence environmental compliance reporting website at https://www.defence.gov.au/about/accessing-information/environmental-compliance-reports/blamey-barracks-kapooka-redevelopment-project as part of Condition 33.

Description of the Activities during the ACR period

- Site Inspections to determine offset area
- Offset Management Plan (OMP) submitted to DCCEEW
- PFAS Management Sub-Plan and PFAS Risk Assessment development

Schedule of plans in effect during the ACR period

BBK Environmental Management Plan

2. Conditions of Approval

	Condition	Is the project	Evidence / Comments
Condition Number		compliant with this condition? Compliant / Non- Compliant or Not applicable	
	Part A – Avoidance, Mitigation, and Compensation Conditions		
	CLEARING LIMITS		
1	The Approval Holder must not:	Not applicable	Action has not commenced
а	clear outside the Action area.	Not applicable	
b	construct outside the Action area.	Not applicable	
2	The Approval Holder must not clear more than 1.39 hectares (ha) of BGW. The Approval Holder must not clear any BGW outside the BGW direct impact area.	Not applicable	
3	If the Approval Holder detects the presence, where likely to be affected by the Action, of any protected matter or the habitat of any protected matter not previously reported to the department as part of the referral or assessment of this Action or in accordance with this condition, the Approval Holder must:	Not applicable	
а	notify the department in writing of the presence and likely extent of the protected matter or protected matter habitat within 10 business days of detecting its presence, and	Not applicable	
b	not clear any area where the protected matter or the habitat of the protected matter is located without approval by the department.	Not applicable	
	MANAGEMENT OF RETAINED BGW		
4	The Approval Holder must undertake all necessary mitigation and management measures to protect retained BGW within 30 metres of the Action Area from impacts during construction, including:	Not applicable	Action has not commenced
а	excluding these areas from worker access using fencing and signage,	Not applicable	
b	diverting construction runoff and sediment away from areas of retained BGW,	Not applicable	
С	suppressing dust generated during construction,	Not applicable	
d	implementing appropriate controls to limit weeds entering the Blamey Barracks Kapooka Military Area on vehicles and in imported materials, and	Not applicable	
е	implementing appropriate controls to prevent the introduction of the root-rot fungus <i>Phytophthora cinnamomi</i> onto the Blamey Barracks Kapooka Military Area during construction in accordance with the <i>Threat abatement plan for disease in natural ecosystems caused by Phytophthora cinnamomi</i> (Department of Environment and Energy, 2018).	Not applicable	
	BGW IN-PERPETUITY OFFSET AREA		
	OFFSET MANAGEMENT PLAN		
5	To compensate for the residual significant impacts of the Action on BGW, prior to commencement of the Action, the Approval Holder must submit to the department for approval by the Minister an Offset Management Plan (OMP) for an area of BGW in the Blamey Barracks Kapooka Military Area. The Approval Holder must not commence the Action unless the OMP has been approved in writing by the Minister. The Approval Holder must commence implementing the approved OMP no later than the commencement of the Action and continue to implement the approved OMP at least until the expiry date of this approval.	Not applicable	OMP is under development and will be submitted to the department prior to commencement of the action

Condition Number	Condition	Is the project compliant with this condition? Compliant / Non-Compliant or Not applicable	Evidence / Comments
6	The OMP must meet the requirements of the <i>Environmental Offsets Policy</i> and the <i>Environmental Management Plan Guidelines</i> to the satisfaction of the Minister. All commitments, including environmental outcomes, management measures, corrective actions, trigger values and performance indicators in the OMP must be SMART and based on referenced or included evidence of effectiveness. The OMP must be prepared by a suitably qualified ecologist and must include:	Not applicable	Subject to approval of OMP by DCCEEW
а	detailed information on the residual impacts to BGW that will be compensated for by the offset area (comprising both the securement of the offset area and the vegetation condition improvements to be achieved in the offset area), including:	Not applicable	Subject to approval of OMP by DCCEEW
	i) all areas of BGW impacted by the Action,	Not applicable	
	ii) a reference to the EPBC Act approval conditions to which the OMP refers,	Not applicable	
	iii) detailed information and a shapefile specifying the location, area and boundary of the offset area, and	Not applicable	
	 iv) detailed baseline information on the vegetation condition of BGW in the offset area, achievable offset area outcomes, relevant to the conservation of BGW and the timeframes in which they will be achieved, 	Not applicable	
b	a table summarising all commitments to achieve the conservation outcomes for BGW in the offset area and a reference to where each commitment is detailed in the OMP,	Not applicable	
С	reporting and review mechanisms to inform the department annually regarding compliance with the implementation of management measures and the attainment and maintenance of the offset area outcomes,	Not applicable	
d	an assessment of risks to achieving each offset area outcome and what risk management measures and/or strategies will be applied to address these,	Not applicable	
е	a monitoring program, which must specify measurable performance indicators and the timeframes for their achievement to gauge attainment of each offset area outcome for the protected matters,	Not applicable	
f	trigger action response plan including:	Not applicable	
	i) performance (outcomes) indicators,	Not applicable	
	ii) trigger values for corrective measures and explanation of their effectiveness for this purpose,	Not applicable	
	iii) monitoring plan, including methods, timing, effort to detect trigger values,	Not applicable	
	 iv) corrective measures to be implemented to ensure conservation outcomes for the BGW are achieved or maintained if trigger values are reached or performance indicators not achieved in the specified timeframes, and 	Not applicable	
	v) details of how progress towards attainment and maintenance of conservation outcomes for BGW will be demonstrated, and	Not applicable	
g	references to related plans and conditions of approval, and how the offset area will be protected, including securement, and all offset area outcomes maintained or improved, at least until the expiry of the approval.	Not applicable	
7	Within 5 business days of commencing implementation of the approved OMP, the Approval Holder must notify the department of the date on which implementation of the OMP commenced.	Not applicable	
	BGW OFFSET AREA SECUREMENT		
8	To compensate for the residual impacts of the Action on BGW, the Approval Holder must secure the offset area specified in the approved OMP within 6 months of approval of the OMP.	Not applicable	Action has not commenced

Condition Number	Condition	Is the project compliant with this condition? Compliant / Non-Compliant or Not applicable	Evidence / Comments
9	The Approval Holder must notify and provide evidence to the department in writing within 5 business days of the offset area site being secured.	Not applicable	
	ACHIEVEMENT OF OFFSET AREA OUTCOMES		
10	The Approval Holder must achieve all conservation outcomes for the offset area specified in the approved OMP by the time specified in the OMP. Once achieved, the Approval Holder must maintain or exceed the conservation outcomes at least until the expiry date of this approval.	Not applicable	Action has not commenced
11	The Approval Holder must, within 40 business days of the 20th anniversary of the commencement of the Action:	Not applicable	
а	have the offset area assessed by a suitably qualified ecologist to determine if the conservation outcomes have been achieved, and	Not applicable	
b	notify the department in writing of any conservation outcome that has not been achieved and the likely reasons that this/these conservation outcomes have not been met.	Not applicable	
	HERITAGE MANAGEMENT		
12	To mitigate impacts on the built heritage value of the Blamey Barracks Kapooka Military Area, the Approval Holder must complete the implementation of the measures set out in Attachment B, at least three years before the end of the period for which approval is granted.	Not applicable	
	MANAGEMENT OF PFAS CONTAMINANTS		
13	Prior to the commencement of the Action, the Approval Holder must prepare and submit to the department any relevant PFAS Management Plans that set out how harm to protected matters from PFAS contaminants during construction will be avoided and mitigated. In preparing PFAS Management Plans, the Approval Holder must be consistent with the following documents:	Not applicable	PFAS Management Plan under development and will be submitted to the department prior to commencement of the action
а	the National Environment Protection (Assessment of Site Contamination) Measure 1999 (Cth),	Not applicable	
b	the PFAS National Environmental Management Plan (PFAS NEMP), and	Not applicable	
С	the National Water Quality Management Strategy.	Not applicable	
14	Where there are multiple PFAS management plans managing the risk from PFAS contaminants during construction, the Approval Holder must articulate in a cover note and/or the PFAS management plans how the plans work together to provide a complete and integrated response to the management of PFAS contaminants during construction.	Not applicable	
15	When providing the department with the PFAS management plans or any revised versions, the Approval Holder must provide for each plan a letter of endorsement from a suitably qualified and experienced environmental practitioner of their assessment of the adequacy of the PFAS management plan to protect the environment from an action on Commonwealth land.	Not applicable	
16	The Approval Holder must implement the PFAS management plans.	Not applicable	
17	By implementing the PFAS management plans, the Approval Holder must prevent any avoidable harm to protected matters and mitigate unavoidable and accidental harm to protected matters.	Not applicable	
18	All commitments, including environmental outcomes, management measures, corrective measures, trigger values and performance indicators in the PFAS management plans must be SMART and based on referenced or included evidence of effectiveness. The PFAS management plans must be consistent with the Environmental Management Plan Guidelines and must include:	Not applicable	
а	details of the relevant protected matters and a reference to EPBC Act approval conditions to which the plan refers,	Not applicable	

Condition Number	Condition	Is the project compliant with this condition? Compliant / Non-Compliant or Not applicable	Evidence / Comments
b	a table of commitments made in the plan to achieve the environmental outcomes, and a reference to where these commitments are detailed in the plan,	Not applicable	
С	details of:	Not applicable	
	 i) contamination screening and work element specific risk assessments that will be performed to characterise cut material and site water for beneficial reuse in the Action Area or offsite disposal, 	Not applicable	
	 ii) a protocol for beneficial reuse of cut material and site water within or between work elements of the Action to minimise the risks of PFAS mobilisation and dispersion, in accordance with 'Section 12: Re-use of PFAS-contaminated materials including soils and water' of the PFAS NEMP, 	Not applicable	
	 iii) materials and stockpile management and dust control in accordance with 'Section 10: On- site stockpiling, storage and containment' of the PFAS NEMP, 	Not applicable	
	iv) off-site disposal of soil and/or construction water, in accordance with 'Section 11: Transport of PFAS-contaminated material' and 'Section 14: PFAS disposal to landfill',	Not applicable	
	 v) dewatering, surface water, and/or construction water management, including how the freshwater 95% species protection criteria for PFOS, PFOA and/or PFHxS, as specified in the PFAS NEMP, will be implemented to ensure that water discharged from the Action Area does not impact downstream receptors, and 	Not applicable	
	vi) how the HIL C (public open space) values will be used for assessing human health risks,	Not applicable	
d	reporting and review mechanisms to demonstrate compliance with the commitments made in the plan,	Not applicable	
е	an assessment of risks relating to achieving the environmental outcomes and risk management strategies that will be applied to address identified risks,	Not applicable	
f	details of the qualifications and experience of the environmental consultants involved in preparing the PFAS management plans and the reviewers and approvers of the plans.	Not applicable	
19	The Approval Holder must ensure that following the completion of the Action, there is a PFAS management plan in place for the Blamey Barracks Kapooka Military Area that provides for the ongoing management of any residual contamination in the Action area, including risk assessment, contingency planning, remediation actions and monitoring.	Not applicable	
20	Within 20 business days after the completion of the Action, the Approval Holder must provide details of the PFAS management plan required under condition 19.	Not applicable	
	Part B – Administrative conditions		
	REVISION OF ACTION MANAGEMENT PLANS		
21	The Approval Holder may, at any time, apply to the Minister for a variation to an action management plan approved by the Minister by submitting an application in accordance with the requirements of section 143A of the EPBC Act. If the Minister approves a revised action management plan (RAMP) then, from the date specified, the Approval Holder must implement the RAMP in place of any previous version of the action management plan.	Not applicable	
	SUBMISSION AND PUBLICATION OF PLANS		
22	Wherever these conditions require the Approval Holder to submit any plan to the department, all such plans must be submitted to the department electronically.	Not applicable	

Condition Number	Condition	Is the project compliant with this condition? Compliant / Non-	Evidence / Comments
realings.		Compliant or Not applicable	
23	Unless otherwise agreed to in writing by the Minister, the Approval Holder must publish each plan on the website within 15 business days of the date the plan is approved by the Minister in writing, if the plan requires the approval of the Minister.	Not applicable	
24	The Approval Holder must keep all plans published on the website, in a format that is easily accessible and downloadable, from the first date which that plan must be published and until the expiry date of this approval. This requirement applies to all current and superseded versions of plans.	Not applicable	
25	The Approval Holder is required to exclude or redact sensitive biodiversity data from any version of a plan before that plan is published on the website or otherwise provided to a member of the public. If sensitive biodiversity data is excluded or redacted from a plan, the Approval Holder must notify the department in writing what exclusions and redactions have been made in the version published on the website.	Not applicable	
	COMMENCEMENT OF THE ACTION		
26	The Approval Holder must notify the department electronically of the date of commencement of the Action, within 5 business days following commencement of the Action.	Not applicable	Action has not commenced
27	The Approval Holder must not commence the Action later than 5 years after the date of this approval decision.	Not applicable	
	COMPLIANCE RECORDS		
28	The Approval Holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.	Not applicable	Action has not commenced
29	If the department makes a request in writing, the Approval Holder must provide electronic copies of compliance records to the department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the department, or by an independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the department's website or through the general media.	Not applicable	
30	The Approval Holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guidelines for biological survey and mapped data, Commonwealth of Australia 2018, or as otherwise specified by the Minister in writing.	Not applicable	
31	The Approval Holder must ensure that any monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.	Not applicable	
32	The Approval Holder must submit all monitoring data, surveys, maps, other spatial and metadata and all species occurrence record data (sightings and evidence of presence) electronically to the department within 20 business days of the next anniversary of the date of this approval decision except where otherwise specified in a plan.	Not applicable	
	ANNUAL COMPLIANCE REPORTING		
33	The Approval Holder must prepare a compliance report for each Annual Compliance Report period (ACR period).	Compliant	This Annual Compliance Report
34	The Approval Holder must ensure each Compliance Report includes:	Compliant	This Annual Compliance Report
а	accurate and complete details of compliance and any non-compliance with:	Compliant	
	i) each condition attached to this approval decision, and	Compliant	
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Condition Number	Condition	Is the project compliant with this condition? Compliant / Non-Compliant or Not applicable	Evidence / Comments
	ii) all commitments made in each plan,	Compliant	
b	a schedule of all plans in effect in relation to these conditions during the ACR period,	Compliant	
С	accurate and complete details of how each plan was implemented during the ACR period, and	Compliant	
d	if any incident occurred, accurate and complete details of each incident. Note: after completion of the Action, the compliance report in relation to management of PFAS contaminants in the Action Area need only state that PFAS is being managed in accordance with the PFAS management plan required by condition 19.	Not applicable	No incidents during reporting period
35	The Approval Holder must ensure each compliance report is completed to the satisfaction of the Minister and is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.	Compliant	This Annual Compliance Report has been completed in accordance with Annual Compliance Report Guidelines, Commonwealth of Australia 2023 for review by DCCEEW
36	The Approval Holder must, within 20 business days following the end of each ACR period, in a format that is easily accessible and downloadable, publish on the website:	Not applicable	
а	each compliance report, and	Not applicable	
b	a shapefile showing all clearing of BGW undertaken within the ACR period.	Not applicable	
37	The Approval Holder must:	Not applicable	
а	Exclude or redact sensitive biodiversity data from each compliance report and shapefile published on the website or otherwise provided to a member of the public.	Not applicable	
b	If sensitive biodiversity data is excluded or redacted from a version of a compliance report published or otherwise provided to a member of the public, submit the full compliance report to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not applicable	
С	If sensitive biodiversity data is excluded or redacted from a version of a shapefile published or otherwise provided to a member of the public, submit the full shapefile to the department within 5 business days of its publication on the website and notify the department in writing what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.	Not applicable	
38	The Approval Holder must notify the department electronically, within 5 business days of each date of publication that the compliance report has been published on the website. In this notification, the Approval Holder must provide the department with the web address for where the compliance report and related shapefile are published on the website.	Not applicable	
39	The Approval Holder must keep each compliance report and related shapefile published on the website from the first date which that compliance report must be published and until the expiry date of this approval. Note: Compliance reports may be published on the department's website.	Not applicable	
	REPORTING NON-COMPLIANCE		
40	The Approval Holder must notify the department electronically, within 2 business days of becoming aware of any incident. The Approval Holder must specify in each notification:	Not applicable	
а	any condition or commitment made in a plan which has not been, or may have not been, complied with,	Not applicable	
b	a short description of the incident, and	Not applicable	

Condition Number	Condition	Is the project compliant with this condition? Compliant / Non-Compliant or Not applicable	Evidence / Comments
С	the location (if applicable, including co-ordinates), date and time of the incident.	Not applicable	
41	The Approval Holder must provide to the department in writing, within 12 business days of becoming aware of an incident, the details of that incident. The Approval Holder must specify:	Not applicable	
а	all corrective measures and investigations which the Approval Holder has already taken in respect of the incident,	Not applicable	
b	the potential impacts of the incident,	Not applicable	
С	the method and timing of any corrective measures that the Approval Holder proposes to undertake to address the incident, and	Not applicable	
d	any variation of these conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.	Not applicable	
	INDEPENDENT AUDIT		
42	The Approval Holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period (5 years).	Not applicable	
43	The Approval Holder must submit details of the proposed independent auditor and their qualifications to the department within 10 business days following the end of each audit period.	Not applicable	
44	The Approval Holder must ensure the scope of each independent audit is sufficient to determine the compliance status for each condition of approval, and each commitment made in each plan.	Not applicable	
45	The Approval Holder must ensure the criteria for each independent audit and the undertaking of each independent audit are consistent with the Independent Audit and Audit Report Guidelines to the extent that the Guidelines are consistent with these conditions.	Not applicable	
46	The Approval Holder must submit an audit report to the department for written agreement from the department within 3 months following the end of each audit period, or as otherwise directed by the Minister in writing.	Not applicable	
47	The Approval Holder must ensure each audit report is completed to the satisfaction of the Minister and is consistent with the Independent Audit and Audit Report Guidelines.	Not applicable	
48	The Approval Holder must publish each audit report on the website, in a format that is easily accessible and downloadable, within 10 business days of the date the department agrees to that audit report in writing.	Not applicable	
49	The Approval Holder must notify the department within 5 business days of the date the audit report is published on the website. In this notification, the Approval Holder must provide the department with the web address for where the audit report is published on the website.	Not applicable	
50	The Approval Holder must keep each audit report published on the website from the first date which that audit report must be published and until the expiry date of this approval.	Not applicable	
	COMPLETION OF THE ACTION		
51	Within 20 business days after the completion of the Action, and, in any event, at least 20 business days before this approval expires (expiry date 31 December 2046), the Approval Holder must notify the department electronically of the date of completion of the Action and provide completion data. The Approval Holder must submit any spatial data that comprises completion data as a shapefile.	Not applicable	
52	The Approval Holder must notify the department electronically 60 business days prior to the expiry date of this approval (expiry date 31 December 2046), that the approval is due to expire. Note: Section 145C of the EPBC Act entitles the Approval Holder to request an extension to the period of effect of this approval.	Not applicable	

Condition Number	Condition	Is the project compliant with this condition? Compliant / Non-Compliant or Not applicable	Evidence / Comments
	Attachment B – Mitigation measures for impacts to built heritage values		
B1	Preparation of a professional, archival recording of the current site with a focus on those buildings to be demolished considering their internal and external layout and function.	Not applicable	
B2	Preparation of an Oral History Report that:	Not applicable	
а	collects audio and/or video testimonies of graduates and staff, where the participants have been chosen from the various decades of use – from the 1960s through to the present	Not applicable	
b	includes photographs associated with the occupation of the living in accommodation (LIA) (an overlap with the archival recording)	Not applicable	
С	includes a report that summarises the main themes from the participant's memories	Not applicable	
d	is recorded in a format that can be publicly accessible (if appropriate under Defence security requirements), either onsite or through an online archive.	Not applicable	
B3	Preparation of an Interpretation Plan, which is to include consideration of:	Not applicable	
а	the existing content in the Interpretation Strategy (Appendix J of the <i>Heritage Management Plan</i> (HMP; Umwelt, 2022), in particular, consultation with the Army History Unit on the implementation of any heritage interpretation	Not applicable	
b	integration of interpretive material regarding the 1960s Blamey Barracks era into the:	Not applicable	
	i) Kapooka Heritage Trail, a pathway between the visitor carpark to the proposed Multi-Function Centre and Parade Ground	Not applicable	
	ii) proposed recruit LIA precinct	Not applicable	
	iii) proposed multi-function centre	Not applicable	
	iv) main Parade Ground	Not applicable	
	v) former Post Office	Not applicable	
С	making content from the archival recording and oral history available online and onsite	Not applicable	
d	the reuse of materials, particularly the red bricks in landscaping	Not applicable	
е	measures to ensure the architectural style and materiality can be understood as an interpretive measure.	Not applicable	
B4	The design of new buildings is to comply with Policies 48 to 52 of the HMP to the extent possible, in order to consider how the architectural style and materiality of new buildings can be understood as an interpretative measure of the former buildings, such as:	Not applicable	
а	large-scale buildings, arranged in a symmetrical 'disciplined' layout	Not applicable	
b	rectilinear forms, preferably rectangular footprints, rather than winged	Not applicable	
С	limited roof overhangs, placing the visual emphasis on the tall, smooth vertical faces of the buildings	Not applicable	
d	buildings are visible in the round and set in grassed areas	Not applicable	
е	warm, rich tones akin to red brick	Not applicable	
f	vertical architectural expressions of the window fenestration with no dominant horizontal expression, resulting in a solid, anchored building	Not applicable	

	Condition	Is the project compliant with	Evidence / Comments
Condition		this condition?	
Number		Compliant / Non- Compliant or Not	
		applicable	
g	consideration as to whether the fibre cement sheeting proposed for the LIA development can be textured, or the size of the sheeting reduced to minimise the visual impact of large flat sheeting	Not applicable	
h	LIA signage should be built in red brick as per concept design.	Not applicable	
B5	Retain and seek to adaptively re-use the remaining Blamey Barracks (1960s) era rectangular buildings as representations of this era at Kapooka. Buildings to be retained include the Officers' and Sergeants' Messes, where their function/use will remain extant and Buildings 11 and 13 (existing accommodation buildings). The Base management will continue to work on identifying adaptive re-use options, and these are likely to be retained as existing visitor or overflow accommodation. In relation to the proposed adaptive reuse of the Edmondson Soldier's Club:	Not applicable	
B6	In relation to the proposed adaptive reuse of the Edmondson Soldier's Club:	Not applicable	
а	replacement of original/early doors which will be impacted are to be further detailed in consultation with the heritage consultant	Not applicable	
b	the original early walls proposed for removal are to be interpreted in the building fabric through the retention of nubs in the wall and accompanied by onsite interpretation	Not applicable	
С	the principles in the Defence Technical Guide: Adaptive Reuse (Department of Defence, 2022) should be considered and integrated into the detailed design.	Not applicable	
С	Comments from National Indigenous Australians Agency		
	First Nations Cultural Heritage Management		
	The National Indigenous Australians Agency (NIAA) noted that it was not clear from the Preliminary Documentation whether First Nations cultural heritage management measures have been finalised and agreed with the relevant Elders consulted about the project. The NIAA:	Not applicable	
	considers that it will be advantageous for both Defence and First Nations parties if the heritage management measures and mechanisms are clearly agreed and set out in one accessible document.	Not applicable	NIAA Reporting in place
	encourages Defence to develop a First Nations Cultural Heritage Management Plan for the project, as recommended in its referral-stage comments on the project.	Not applicable	Defence Cultural Heritage Management Plan is in place.
D	First Nations Engagement		
	The NIAA understands that Defence has consulted about the redevelopment project with several Elders groups and individuals and the Wagga Wagga Local Aboriginal Land Council. This NIAA:	Not applicable	
	encourages Defence to continue this engagement throughout the redevelopment project, and	Compliant	Ongoing attendance at local community forums.
	if it has not already done so, recommends Defence engage with First Nations stakeholders about any project-related concerns they may have in addition to cultural heritage management.	Compliant	Ongoing attendance to local community forums.
E	First Nations Employment, Training and Business Opportunities		
	The Preliminary Documentation indicates that Defence may be considering First Nations procurement opportunities for the redevelopment project. The NIAA suggest that Defence consider employment, training and business opportunities for local First Nations people in discussion with local First Nations stakeholder groups and employment and training providers. As indicated in NIAA referral comments, development of a First Nations employment, training and procurement plan could assist in developing and implementing such opportunities	Compliant	NIAA Reporting and RRJV Indigenous Participation Plan.

3. Correcting Non-Compliances

No non-compliances have been recorded for this reporting period.

4. New Environmental Risks

No new environmental risks were observed for the approved action.