



Australian Government
Defence

Annual Compliance Report 2026

Cultana Expansion Area Project,
near Whyalla, South Australia

EPBC 2010/5316





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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* (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:	Berlinda Bowler
Position:	Director, Environmental Planning, Assessment and Compliance
Organisation:	Department of Defence ABN: 68 706 814 312

1 Description of Activities

The Cultana Expansion Area (CEA) project comprised the expansion of the Cultana Training Area (CUTA) in South Australia westwards through the acquisition of pastoral leases. The area of expansion was 50,250 hectares, bringing the total area of the CUTA to 209,294 hectares. The project was assessed under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act, EPBC number 2010/5316), and approved subject to conditions on 5 December 2013.

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. The approval 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 compliance reports for the CEA project are due each year by 9 January, and address compliance for the preceding year. This report is the tenth annual compliance report for the CEA project, and provides information on activities undertaken in 2025 to address compliance with the conditions of approval.

In 2024, the CEA was reduced to approximately 150,600 hectares as part of a Commonwealth land swap with the South Australian Government. This is reflected in a formal variation of conditions attached to approval issued by the Department of Climate Change, Energy, the Environment and Water (DCCEEW) on 12 June 2024.

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 with Defence known as the Miscellaneous Lease for Defence Purposes (MLDP).

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 MLDP requirements and EPBC Act approval conditions. The suite of environmental management documents was formally endorsed by the South Australian Government in March 2016.

2 Conditions of Approval

Table 1 – Compliance Table

Reference to DCCEEW herein also refers to former iterations of that Department's title.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
1	Prohibited activities No chemical, biological, radioactive or nuclear weapons may be taken onto or used within the boundaries of the CEA .	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	Stakeholder engagement 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. This webpage must: a) be easily accessible and easily found by members of the public, and	Compliant	The website was published before 1 July 2024 and is found here: 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
	b) provide a direct means of communication between the public and the approval holder. 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. 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. The summary must provide evidence of active and timely engagement with the community to resolve open issues which remain under consideration.		
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	Compliant	No complaints were reported in 2025. 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' www.army.gov.au/our-news/noise-and-training-notice.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	established prior to commencement of the action. 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.		Noise and Training Notices are published monthly on the Army – News and Events. The Directorate of Operations and Training Area Management (DOTAM) advertises in the local papers for Whyalla and Port Augusta, Whyalla News, and The Transcontinental respectively. 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 RAAF Base Edinburgh who will assist, or contact Defence via www1.defence.gov.au/about/contact-us. Defence maintains a centralised set of protocols and processes to record, process, and investigate complaints in the Defence Garrison Estate Management System (GEMS) which is an online SAP-based system that provides a single source of information for all estate management activities.
4	Environmental Management Framework The approval holder must establish and implement an environmental management system (EMS) for <i>the CEA</i>, consistent with <i>ISO 14001</i>. The EMS must include an overarching document that: a) describes the interaction between elements of the EMS including the	Compliant	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: www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area. The EMS was developed in close consultation with representatives of the South Australian Minister for Environment and was endorsed by the South Australian

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	Defence Environmental Management Framework, and specific plans relevant to the CEA as well as other elements of the CEA environmental management framework; b) identifies roles and responsibilities for implementation of the elements of the EMS; and c) describes arrangements for ongoing review (and revision as necessary) of elements of the EMS. 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.		Government on 29 March 2016. In addition to intergovernmental cooperation in developing the EMS, community consultation occurred through the Cultana Environmental Advisory Committee. The EMS and EMP documents were distributed to EAC members in March 2016, including local councils, Aboriginal groups and community representatives. The 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. 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). An updated and revised Cultana EMP was submitted to DCCEEW on 12 December 2023. DCCEEW provided feedback and Defence is currently overhauling its environmental management document series to respond to DCCEEW's feedback.
5	The approval holder must prepare and implement operational controls that	Compliant	A range of operational controls has been implemented at the CEA to reduce environmental impacts and maintain

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	reduce environmental impacts and maintain public amenity and safety. The operational controls must address at least the following public amenity matters: a) firing of projectiles from, into or within the CEA over any public road or railway or any other area occupied by civilians; b) noise, noting that training activities may occur at night; c) transport of equipment and personnel to, from and within the CEA; d) dust and smoke; e) electro-magnetic frequency interference (including electronic warfare activities); and f) light spill (including laser technologies). 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.		public amenity and safety. There have been no changes to operational controls for 2025. The primary operational controls include the 2016 EMF, EMP, the Defence Environmental Clearance Certification process (compliance controls), Standard Operating Procedures, and dedicated Training Area Standing Orders. When and where relevant to particular matters, the following are also applied: safety templates and roads, perimeter fencing, firebreaks and warning signs, Emergency Services contacts, local media and Defence web pages, community engagement and information opportunities. In response to the specific requirements of this condition the following controls are in place: a) Training Area Standing Orders that cover firing procedures, permitted areas for firing and prohibited firing areas from, into, or within the CEA. 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. c) Vehicle road movements and crossings are undertaken at times with the least amount of public traffic on roads. The Training Area Standing Orders set restrictions on off-road movement and prescribe speed limits to help dust suppression. The Department of Planning Transport and Infrastructure and the South Australian Police traffic

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			management are engaged as required; signs are also put in place when necessary. 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 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. e) In accordance with the <i>Radiocommunications Act 1992</i>, specific radiofrequency bands are designated to be used for national defence. The Defence Electromagnetic Spectrum Manual governs Defence's use of the radiofrequency spectrum and includes consideration of public amenity and safety. This publication will replace the Defence Spectrum Manual (SPECMAN). The update is primarily structural and the content regarding the use of radiofrequency bands, public amenity and safety remains unchanged. 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.
6	Management plans	Compliant	A TSHMP addressing the requirements of this condition was included in the EMP (Chapter 3.4) and submitted to

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	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 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. 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. 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		DCCEEW 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>). In 2023, Southern Whiteface (<i>Aphelocephala leucopsis</i>) was assessed to be eligible for listing as Vulnerable under the EPBC Act. Records of the Red-lored Whistler (<i>Pachycephala rufoularis</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. 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. An updated and revised Cultana EMP was submitted to DCCEEW on 12 December 2023. DCCEEW provided feedback and Defence is currently reviewing its environmental management document series to respond to DCCEEW's feedback. An independent 5-yearly performance report completed by AECOM (managed by JLL) (Attachment A), reflects that:

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	TSHMP must not be implemented until it has been approved by the Minister. Note: This condition may be satisfied by a single document, or separate documents dealing with individual species or groups of species.		- 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. This independent 5-yearly performance report was provided to the South Australian Government in December 2023.
7	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: - Feral Cat (<i>Felis catus</i>) - Red Fox (<i>Vulpes vulpes</i>) - Feral Goat (<i>Capra hircus</i>) - Rabbit (<i>Oryctolagus cuniculus</i>)	Compliant	A BONSMP addressing the requirements of this condition was included in Chapter 4.2 of the EMP was submitted to DCCEEW on 7 October 2016. Weeds are mapped annually and ground-truthing occurs along the tracks to monitor effectiveness. No new Carrion flower populations were identified in 2025. Known carrion flower populations continue to be treated with herbicide. Wild goat management was conducted in 2025 with 1,295 goats removed from January to May 2025. This is a significant increase in goat numbers removed from the previous reporting period (of 518). Felixer technology was used in 2025 (Jan-Sept) to manage Feral Cat and Fox populations with 1 Cat and 13 Foxes successfully removed. Integrated management also includes 1080 baiting and den destruction. An updated and revised Cultana EMP was submitted to DCCEEW on 12 December 2023. DCCEEW provided

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	- Rodents (<i>non-native Mus and Rattus spp.</i>) - tramp ants - Buffel Grass (<i>Cenchrus ciliaris</i>) - Carrion Flower (<i>Orbea variegata</i>) The BONSMP must make reference to any relevant threat abatement plans approved under the EPBC Act. 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.		feedback and Defence is currently reviewing its environmental management document series to respond to DCCEEW's feedback. An independent 5-yearly performance report completed by AECOM (managed by JLL, Attachment A), reflects that: - 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. This independent 5-yearly performance report was provided to the SA Government in December 2023.
8	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: a) identification of, and management prescriptions for, existing contamination	Compliant	A PPCMP addressing the requirements of this condition was included in the EMP submitted to DCCEEW on 7 October 2016. 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.

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	by waste fuels and other hazardous and toxic substances. b) protocols for the safe storage, handling, use, transport and disposal of fuels and other anticipated hazardous and toxic substances; c) measures for monitoring contamination against known baselines, making reference to any applicable Australian standards; and d) contingency measures for reporting, containing and remediating spills and other accidental pollution events. 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. Material described in 8a) above must be provided to the Minister within twenty-four (24) months of commencement of the action.		

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
9	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: • Civil Aviation Safety Authority, in relation to airspace management; • 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. Note: The Department acknowledges that in some cases consultation may already have occurred.	Compliant	The PER provided information about consultation with relevant organisations. Liaison with the organisations now occurs as and when necessary.
10	Environmental planning framework Construction and training activities may only be undertaken in accordance with	Compliant	Defence applied the environmental assessment processes described in the PER to construction and continues to do so for training activities at the CEA.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	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: • a report of the environmental assessment in question including a copy of Defence's environmental assessment; • 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. 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.		Environmental assessments conducted on activities in 2025 did not identify any residual impacts on matters protected under the EPBC Act.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	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.		
11	Monitoring and reporting The approval holder must engage a suitably qualified expert to prepare an environmental baseline condition report (EBCR). The EBCR must describe the condition of the environment at the CEA at the commencement of the action at least in the following terms: a) comprehensive ground-truthed mapping of vegetation communities, using a relevant regional or statewide vegetation classification system; b) descriptions of all vegetation communities occurring within the CEA, including information on key species, conservation status, soil, geographic and climatic preferences, relevant threats and general condition;	Compliant	An Environmental Baseline Condition Report (EBCR) addressing the requirements of this condition was submitted to the DCCEEW in October 2016 and is available on the Defence Environmental Compliance Reporting website: www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area. A report by EcoLogical was completed in 2025 to undertake vegetation classification and habitat modelling to determine the extent of potential habitat for the Western Grasswren (<i>Amytornis testilis myall</i>) Habitat. GIS data was developed and provided to Defence.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	c) comprehensive ground-truthed mapping of environmentally sensitive features including claypans, contaminated sites and highly erodible or saline soils; d) comprehensive ground-truthed mapping of waterbodies and watercourses (including floodplains) within the CEA; e) comprehensive mapping (unless culturally inappropriate) of culturally significant sites and areas, based on local, state and Commonwealth heritage databases as well as consultation with relevant traditional owners; 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; g) an inventory of all species known to occur within the CEA; and h) descriptions, justifications and limitations (eg. due to climatic conditions) of survey methodology employed. The EBCR must be provided to the Minister within twenty-four (24) months		

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	of the complete acquisition of the CEA . No native vegetation may be cleared without having been surveyed.		
12	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: a) clearly defined thresholds and indicators including occurrence, extent, abundance and condition for the following parameters: i) soil; ii) water; iii) air; iv) noise; v) threatened species vi) animal pests, weeds and pathogens; and vii) indigenous and non-indigenous heritage;	Compliant	A SMRP addressing the requirements of this condition was included in the EMP submitted to DCCEEW on 7 October 2016. 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. Monitoring activities identified in the SMRP at Chapter 10 of the EMP include Jessup transects, which were repeated in 2025. The 30 monitoring points transect a range of vegetation types across CUTA, measuring vegetation density, cover and condition. Twenty-eight of the 30 sites surveyed were rated Good to Excellent condition, while two sites were rated Fair in condition. Dry conditions with below-average rainfall in the 12 months preceding the surveys may have contributed to declines in plant productivity and abundance. Jessup transects are scheduled to be conducted every 5 years, with the next transects due in 2030.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	b) establishment of a representative network of longitudinal reference sites; c) establishment of a periodic vegetation remapping regime (at least every ten (10) years); d) a clearly articulated "rest and rotation" policy for the protection of areas potentially damaged by overuse; e) descriptions and justifications of survey methodology to be employed; f) a recovery planning process linked to the thresholds and indicators defined in 12 a) above; and g) a requirement for the preparation of annual sustainability monitoring reports on implementation of the SMRP (including any management responses undertaken or intended). 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.		

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
13	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.	Compliant	The SMRP for the CEA was provided to DCCEEW on 7 October 2016, as part of the EMP (Chapter 10). An updated and revised Cultana EMP was submitted to DCCEEW on 12 December 2023. DCCEEW provided feedback and Defence is currently overhauling its environmental management document reviewing to respond to DCCEEW's feedback. An independent 5-yearly performance report completed by AECOM (managed by JLL, Attachment A), reflects that: • 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. This independent 5-yearly performance report was provided to the SA Government in December 2023.
14	Miscellaneous environmental management Prior to any commencement of the action, the approval holder must provide the Department with a copy of the CEA lease agreement	Compliant	A copy of the signed MLDP was provided to DCCEEW on 30 July 2014, prior to commencement of the action on 9 October 2015.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	Note: The conditions of approval have been prepared in consideration of a draft of the agreement described above. Substantial deviations from this draft may result in variations to the conditions of approval under Section 143 of <i>the EPBC Act</i>.		
15	The following environmental themes must be managed in accordance with <i>the CEA lease Agreement</i>: • flora and fauna (except for <i>threatened species</i> as defined for the purposes of these conditions); • bushfire; • water conservation; • noise and vibration; • air and water pollution; and • decommissioning and closure. Any documents required in accordance with <i>the CEA lease agreement</i> must be provided to the Department upon request.	Compliant	The site is being managed in accordance with the MLDP issued by the South Australian Government. The South Australian Government endorsed Defence environmental management documentation for the CEA to in March 2016. 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). All CEA Bushfire Management Plan requirements were completed prior to 1 November 2020. Firebreaks comply with the requirements of the CEA MLDP.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
16	Administrative conditions 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 '.	Compliant	Actions involving the demolition of redundant structures commenced on 9 October 2015. DCCEEW was notified on 3 November 2015.
17	The approval holder must maintain accurate records substantiating all activities associated with or relevant to the conditions of approval, including measures taken to implement all management documents 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.	Compliant	The GEMS is used as a centralised system to maintain accurate records. 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: www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area
18	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	Compliant	Defence submitted the first Annual Environmental Compliance Report for the Cultana Expansion Area project to DCCEEW in January 2017 (which reported on activities undertaken 2016).

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	conditions of approval, including implementation of any management documents as specified in the conditions of approval. Documentary evidence providing proof of the date of publication and non-compliance with any of the conditions of approval must be provided to the Department at the same time as the compliance report is published. Note: To facilitate administration, this requirement may be addressed concurrently with the annual sustainability monitoring reporting process described in Conditions 12 and 13.		Annual compliance reports have been provided every 12 months since, with this being the tenth (10th) report. Annual Compliance Reports on Defence's website at: www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area
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	The Minister has not directed Defence to provide an independent audit of compliance.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
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 management document , that management document must be implemented in place of the management document originally approved.	Not applicable	Activities otherwise than in accordance with a management document have not been planned to date at CEA.
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 management documents specified in the conditions of approval and submit the	Not applicable	The Minister has not requested that Defence make specified revisions to management documents.

Condition Number	Condition	Is the project compliant with this condition?	Evidence Comments
	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 management document , then the approval holder must continue to implement the management document originally approved, as specified in the conditions of approval.		
22	If, at any time after five (5) years from the date of this approval, the approval holder has not substantially commenced the action, then the approval holder must not substantially commence the action without the written agreement of the Minister .	Complete	The action commenced on 9 October 2015.
23	Unless otherwise agreed to in writing by the Minister , the approval holder must publish all management documents referred to in the conditions of approval on their website. Each management document 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 website at: www.defence.gov.au/about/accessing-information/environmental-compliance-reports/expansion-cultana-training-area

3 Correcting Non-Compliances

No non-compliances have been identified by Defence.

4 New Environmental Risks

No new environmental risks were observed for the approved action.