Submarine Rotational Force - West Priority Infrastructure Works Annual Compliance Report 2025/26 (EPBC Act approval 2024/10031)

HMAS Stirling, Garden Island, Western Australia

Department of Defence

24 September 2026

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	james.dugdell Digitally signed by james.dugdell Date: 2026.09.22 12:17:51 +10'00'
Full name	**Lieutenant Colonel James Dugdell**
Position	Director Maritime Infrastructure Delivery – West
Organisation	Maritime Infrastructure and Integration Branch Infrastructure Division – Department of Defence
Date	22 September 2026

Change Register

Version	Date	Reason for revision
1	10/09/2026	New document – first ACR for reporting period covering 27 May 2025 to 27 July 2026.

Abbreviations

Abbreviation	Definition
ACR	Annual Compliance Report
ALA	Atlas of Living Australia
AUKUS	Australia, the United Kingdom and the United States
CIF	Controlled Industrial Facility
CMC	Controlled Modulus Column
dBA	A-weighted decibels
dB	Decibel
DBCA	Department of Biodiversity, Conservation and Attractions (WA)
DCCEEW	Department of Climate Change, Energy, the Environment and Water
Defence	Department of Defence
Department	Department of Climate Change, Energy, the Environment and Water (DCCEEW) (now National Environmental Protection Agency (National EPA) as of 1 July 2026) (referred to as 'the Department')
eDNA	Environmental DNA
EPBC Act	Environment Protection and Biodiversity Conservation Act 1999 (Cth)
FCMP	Fox and Cat Management Plan
GHD	GHD Pty Ltd
GPS	Global Positioning System
ha	Hectare
HMAS	His Majesty's Australian Ship
HMAS Stirling OSCM	HMAS Stirling Oil Spill Contingency Manual
MII	Maritime Infrastructure and Integration
MFO	Marine Fauna Observer
MNES	Matters of National Environmental Significance
OCW	Other Carnivores in Water
PFAS	Per- and poly-fluoroalkyl substances
PMCA	Project Management and Contract Administration
Project CEMP	Construction Environmental Management Plan
SEO	Site Environment Officer
SEL	Sound Exposure Levels
SMART	Specific, Measurable, Attainable, Relevant and Timebound
SRF-West	Submarine Rotational Force – West
SSN	Ship submersible, nuclear
TBT	Tributyltin
UK	United Kingdom
US	United States
VMS	Vessel monitoring system
WA	Western Australia
WAMSI	West Australian Marine Science Institution

Contents

Table index

1. Introduction

1.1. SRF-West Priority Infrastructure Works

Australia, the United Kingdom (UK) and the United States (US) have joined together through the Australia, the United Kingdom and the United States (AUKUS) partnership to support a stable, secure and prosperous Indo-Pacific region. The AUKUS partners have identified an Optimal Pathway that will:

- deliver Australia a conventionally armed, nuclear-powered submarine (SSN) capability
- elevate all 3 nations' industrial capacity to produce and sustain advanced and interoperable SSNs for decades to come
- expand the partner nations' individual and collective presence in the Indo-Pacific and contribute to global security and stability in the region.

The first major initiative of the Optimal Pathway is the increased rotational presence of US and UK SSNs in Australia (Figure 1). This initiative is known as the Submarine Rotational Force – West (SRF-West).

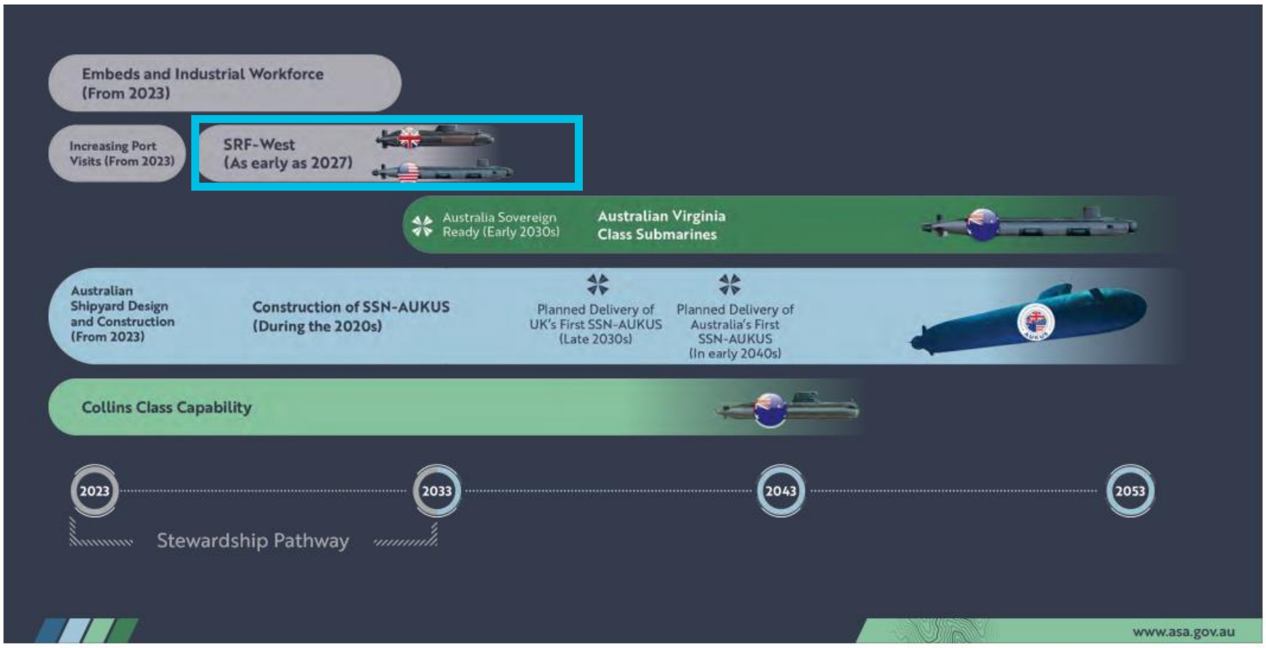

Figure 1 *The AUKUS Optimal Pathway to Australia's Nuclear-Powered Submarine Capability (Source: Australian Submarine Agency*

From as early as 2027, AUKUS partners will have a rotational presence at His Majesty's Australian Ship (HMAS) Stirling, which is located on Garden Island/*Meeandip*, south-west of Perth in Western Australia (WA). One UK Astute Class and up to 4 US Virginia Class SSNs are expected to rotate through HMAS Stirling. SRF-West will help Australia build the necessary operational capabilities and skills so that Australia can safely and securely own, operate, maintain and regulate a fleet of SSNs from the early 2030s.

The Department of Defence (Defence) is responsible for delivering the priority infrastructure upgrades and enhancements at HMAS Stirling to accommodate AUKUS SSNs ready for SRF-West by 2027.

1.2. Purpose of this report

The approved Action was referred under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) (now National Environmental Protection Agency (National EPA) as of 1 July 2026) (referred to herein as 'the Department') and assessed under the 'Preliminary Documentation' pathway. Defence was granted approval on

27 May 2025 (**EPBC Act approval 2024/10031**). A variation to the conditions of approval was granted on 27 May 2026 (refer to Section 3.1).

The purpose of this report is to assess that all approval conditions granted under **EPBC Act approval 2024/10031** have been considered and addressed, and to provide a summary of evidence to support the compliance designations including references to supporting documentation that may relate to that approval condition.

This Annual Compliance Report (ACR) has been prepared in accordance with Condition 42 of the approval and the Annual Compliance Report Guidelines, (Commonwealth of Australia, 2023) (referred to as Annual Compliance Report Guidelines) as summarised in Table 1.

This report is the first ACR and is required for the reporting period commencing 27 May 2025 to 27 July 2026.

Table 1 ACR Requirements

Requirement	Location in this ACR
A declaration of accuracy for this ACR signed by the approval holder	Page ii
A description of the activities, including a description of the approved action and details of the current activities completed during the ACR reporting period	Section 2
Demonstration that all approval conditions have been considered and addressed including an assessment of compliance against all conditions imposed by EPBC approval	Section 3
A schedule of plans in effect during the reporting period, including details of the commitments of these plans that support an approval condition	Section 4
Details of any incidents (as defined by the EPBC approval) that occurred during the reporting period including of corrective actions undertaken for any findings of potential non-compliance and a summary of corrective measures taken	Section 5
Details on new environmental risks encountered during the reporting period	Section 6

2. Description of activities

2.1. Description of Approved Action

EPBC number	2024/10031
Project name	Submarine Rotational Force – West, Priority Infrastructure Works (SRF-West Priority Works)
Approval holder	Department of Defence
Action	To: a) upgrade and install new maritime infrastructure including, pier and wharf improvements, mooring dolphin, new small vessel pontoons and berthing, and associated dredging works and piling, b) construct and operate a Controlled Industrial Facility (CIF) to store low-level radioactive waste. Associated infrastructure and works include hardstands, roads, buildings, water tanks, utility building, in-ground infrastructure and drainage, vegetation removal and lay down areas. Refer to EPBC Act referral 2024/10031
Location of Action	HMAS Stirling, Garden Island, Western Australia
Dates for the reporting period of the Annual Compliance Report	Period commencing 27 May 2025 to 27 July 2026
Date of preparation of the Annual Compliance Report	10 September 2026
Person accepting responsibility for the Annual Compliance Report	Maritime Infrastructure and Integration (MII) Branch – LTCOL James Dugdell

2.2. Activities undertaken during the reporting period

The reporting period relates to both landside and maritime construction work undertaken during the reporting period. Activities undertaken during the reporting period covered by this ACR are summarised in Table 2.

Table 2 Works undertaken during the reporting period

Work phase	Activities
Environmental assessment, management and reporting documentation preparation and approval	Preparation (and approval where required) of the following environmental assessment, management and reporting documentation: • SRF-West Construction Environmental Management Plan (CEMP) (Versions 1, 2, 2.1, 3 and 3.1) including annexures for specific environmental aspects • Little Penguin Baseline Population report prepared, submitted and approved by the Department • Little Penguin Monitoring report prepared and provided to the Department • HMAS Stirling Oil Spill Contingency Manual (HMAS Stirling OSCM) revised • Fox and Cat Management Plan • Syngnathid Management Plan • Construction Contractor CEMPs prepared and approved by the Project Manager Contract Administrator (PMCA) covering all construction activities undertaken during the reporting period
Site preparations/ mobilisation	Site preparation and mobilisation activities for landside activities undertaken during the reporting period including: • site survey and pegging (including identification of existing services) • installation of temporary perimeter fencing and cordon off avoidance areas • installation of temporary signage • installation of sound barrier • establishment of temporary site compound and laydown areas • mobilisation of heavy machinery and equipment to the site • importing site offices to laydown areas • management and storage of construction materials and waste at designated laydown areas within the Action area or elsewhere within HMAS Stirling as agreed by the Construction Contractor and HMAS Stirling Base management
Fauna monitoring and surveys	Terrestrial fauna monitoring and surveys prior to and during clearing, including: • pre-clearance surveys • Perth slider salvage surveys • Tammar wallaby flushing • fauna monitoring during clearing
Vegetation clearing	Vegetation clearing undertaken during reporting period included: • clearing and grubbing of native vegetation present within the disturbance footprint • mulching of cleared vegetation for re-use in landscaping
Earthworks	Earthworks undertaken during reporting period included: • soil cut and fill work • soil compaction • soil stockpile sampling • asphalt demolition • transportation of material offsite • test pit sampling • shell screening
Enabling works	Enabling works undertaken during reporting period include: • asbestos pipe and concrete section removal • geotechnical investigations • earthworks required to support installation of services infrastructure • soil excavation, compaction and access track development on site

	• fill to prepare for concrete slab installation • importing material to site
Clean-up/ de-mobilisation	No demobilisation has occurred during reporting period • Ongoing clean-up activities have occurred including: • removal of stockpiles and excess materials • off-site disposal of construction waste to an appropriately licensed facility
Maritime trial piling exercise	The maritime trial piling exercise was completed which included: • site mobilisation • maritime piling rig establishment (located on wharf) • Syngnathid surveys and establishment of Syngnathid translocation site • deployment of Marine Fauna Observers (MFOs) (vessel based) • deployment and retrieval of unattended acoustic loggers at monitoring locations • maritime impact piling with and without noise attenuating measures implemented • demobilisation
Vessel operations	Vessel operations comprising: • launching and retrieval activities • anchoring, mooring and berthing • vessel operation support for undertaking bathymetric surveys and dilapidation surveys required ahead of maritime piling activities • vessel operation support for undertaking maritime piling activities • vessel operations for Syngnathid translocation activities at Diamantina Pier
Maritime Piling	Maritime piling including: • preparatory activities including fender removal, ladder removal, core drilling and overall readiness for piling • set up for piling including pile frame set up, initial pitch and pile setting with vibratory piling, splice pile sections and paint • impact pile driving

2.3. Activities not undertaken during the reporting period

The following approved works were not conducted during the ACR reporting period and will be reported on in subsequent versions of the ACR:

- maritime activities associated with dredging
- maritime piling and construction activities at Moresby Harbour, Armament Wharf, and Southern Boat Harbour
- Syngnathid translocation activities for Moresby Harbour and Armament Wharf
- construction of the CIF including establishment of concrete foundations and hardstand, establishment of CIF formwork and structures, internal fit out and commissioning of the CIF building
- installation of CIF ancillary infrastructure including fire water tanks and pump, refuelling bays, spill detection and collection system, operational lighting and wharf side utility building at Diamantina Pier.

3. EPBC Act Approval Compliance Assessment

The assessment of EPBC Act approval compliance has been developed to address requirements set out in Section 3.6 of the ACR Guidelines (DCCEEW, 2023). Table 3 outlines how and where each of the conditions have been assessed against the compliance designations for the duration of the reporting period.

3.1. Conditions of Approval

The conditions are provided in the below table.

Table 3 Compliance assessment

Condition number	Conditions	Compliance	Evidence and supporting documentation
Clearing Limits			
1) a)-c) Original dated 27 May 2025.	*The approval holder must not:* *a) Clear outside of the Action area.*	Compliant	Vegetation clearing occurred between 5 September 2025 and 12 September 2025. No clearing occurred outside the Action area as detailed and reported in the weekly inspection checklists and provided in the Project CEMP Implementation Reports (GHD, 2026f; GHD, 2026h).
	b) Construct outside of the Action area.		Prior to the commencement of construction, fencing and signage was erected to identify avoidance areas and no-go zones with ongoing visual inspection of fencing and signage in all avoidance areas and no-go zones (as marked on site maps in the Project CEMP). No construction occurred outside the Action area as reported in the weekly inspection checklists (refer to the Project CEMP Implementation Reports, (GHD, 2026f; GHD, 2026h).
	c) Harm protected matters within the avoidance areas.		During the ACR reporting period no incidents have occurred involving harm to protected matters within the avoidance areas (GHD, 2026f).
2) a) Original dated 27 May 2025.	*The approval holder must not clear more than:* – *a) 1.78 hectares (ha) of Perth slider habitat.*	Compliant	A total of 1.73 ha of vegetation clearance occurred for the CIF footprint between 5 September 2025 and 12 September 2025. The actual extent of vegetation clearing undertaken is provided in the Project CEMP Implementation Report (GHD, 2026f) and as a shapefile on the **Project website**.

Condition number	Conditions	Compliance	Evidence and supporting documentation
2) b) Original dated 27 May 2025.	– *b) 1.00 ha of seagrass within the seagrass disturbance area.*	Not applicable	No maritime activities requiring seagrass clearing were undertaken during the ACR reporting period.
3) a)-d) Original dated 27 May 2025.	*The approval holder must ensure that, from the commencement of the Action until completion of the Action:* – *a) no dredging occurs outside the dredge areas,* – *b) at the Diamantina Pier dredge area, the total volume of material dredged (dredge volume) does not exceed 6,500 cubic metres (m3) and the maximum depth of dredging (dredge depth) does not exceed 12.8 m below the Low Water Mark Fremantle, and* – *c) at the Moresby Harbour dredge area, the total dredge volume does not exceed 2,100 m3 and the dredge depth does not exceed 3.3 m below the Lowest Astronomical Tide,* – *d) at the Armament Wharf dredge area, the total dredging volume does not exceed 13,000 m3 and the dredge depth does not exceed 12.8 m below the Low Water Mark Fremantle.*	Not applicable	No maritime activities associated with dredging were undertaken during the ACR reporting period.
Injury avoidance and veterinary care			
4) Original dated 27 May 2025.	*From the commencement of the Action until the completion of the Action, the approval holder must arrange for veterinary care or assistance from an experienced wildlife carer for any native terrestrial or marine animal found injured within the Action area.*	Compliant	During the ACR reporting period the arrangement for veterinary care and assistance is provided in accordance fauna injury and relocation procedures for terrestrial or marine animals found injured within the Action area as outlined in the Project CEMP (GHD, 2026a). The fauna tracking register appended to the CEMP Implementation Reports (GHD, 2026f; GHD, 2026h) provides details of all fauna relocation activities (including the provision of veterinary care) undertaken for all alive, injured or deceased native terrestrial or marine fauna discovered during the ACR reporting period.

Condition number	Conditions	Compliance	Evidence and supporting documentation
5) Original dated 27 May 2025.	*The approval holder must ensure that, from the commencement of the Action until completion of construction, if any little penguin, Perth slider or marine mammal is found injured or killed within the Action area, the approval holder must immediately initiate a stop works procedure.*	Compliant	One incident involving the discovery of injured or dead Perth sliders occurred during the ACR reporting period. On discovery of the deceased Perth sliders, a stop works procedure was immediately initiated and notification to the Department was provided. Full details of this incident are provided in Section 5.
Construction Environmental Management Plan (CEMP)			
6) Original dated 27 May 2025. Superseded	*To avoid and mitigate harm on protected matters, the approval holder must prepare and implement a Construction Environment Management Plan (CEMP) that complies with Conditions 7 and 8a-bb and must not be inconsistent with the conditions of this approval. The approval holder must ensure the CEMP is prepared by a suitably qualified professional before the commencement of the Action. The approval holder must commence implementation of the CEMP no later than the commencement of the Action. The approval holder must continue to implement the CEMP until the completion of construction.*	Compliant	Project CEMP Versions 1 - 3.0 were prepared by suitably qualified professionals to comply with Condition 7 and 8a-bb and to be consistent with all relevant approval conditions (GHD, 2026a). A condition of approval reference table is included in each Project CEMP version.
6) As varied on 27 May 2026. Supersedes 6) above	*To avoid and mitigate harm on protected matters, the approval holder must prepare, publish and implement a Construction Environment Management Plan (CEMP) that is consistent with the conditions of this approval. The approval holder must commence implementation of the CEMP no later than the commencement of the Action. The approval holder must continue to implement the CEMP until the completion of construction.*	Compliant	Project CEMP Version 3.1 was prepared and has been published on the [Project website](). A condition of approval reference table is included in Appendix B of each Project CEMP version which identifies how the conditions have been addressed. Implementation of the Project CEMP commenced on 27 August 2025. Implementation is reported in six-monthly CEMP Implementation Reports with the first accounting for the period of Project CEMP implementation between 27 August 2025 and 31 January 2026 (GHD, 2026f). The second six-monthly CEMP Implementation Report accounted for the period of Project CEMP implementation between 1 February 2026 and 31 July 2027 (GHD, 2026h).
	The approval holder may prepare the CEMP as iterative versions to address the staged implementation of the Action. In doing so, the following must be undertaken: – *a) For each version of the CEMP, the approval holder must:*		Each version of the Project CEMP, including the current Project CEMP Version 3.1 (GHD, 2026a), has been published on the [Project website]() which clearly identifies the version currently being implemented.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	• *i. publish the version on its website and notify the department, within 15 business days prior to implementation, and* • *ii. clearly identify on the website the version currently being implemented*		The Department has been notified of the publication of each Project CEMP version, within 15 business days prior to implementation of the Project CEMP.
	– *b) For all parts of the Action, the approval holder must:* • *i. implement the version of the CEMP relevant to the part(s) of the Action being undertaken.* • *ii. not undertake any part of the Action unless it is addressed by the current version of the CEMP.* – *c) Each version of the CEMP must:* • *i. be prepared by suitably qualified professionals,* • *ii. specify the parts of the Action covered,* • *iii. identify key changes from the previous version (if any),* • *iv. address all relevant requirements of condition 8, and* *v. justify why any requirements of condition 8 (if any) are not relevant and therefore not addressed*		During the reporting period, Project CEMP Versions 1-3.1 were implemented. All activities undertaken during the reporting period were addressed by the Project CEMP current at the time. Implementation of each version of the Project CEMP is reported in six-monthly CEMP Implementation Reports which detail the activities undertaken (GHD, 2026f) (GHD, 2026h). Each version of the Project CEMP has been prepared by suitably qualified professionals and specifies the parts of the Action. Version 3.1 of the Project CEMP contains a version history which identifies key changes for each iterative Project CEMP version (GHD, 2026a).
7) a)-b) Original dated 27 May 2025	*The approval holder must engage a suitably qualified professional who is responsible for managing and reporting on the implementation of the CEMP to comply with condition 6 from the commencement of the Action until completion of construction. The approval holder must submit a CEMP implementation report to the department every 6 months following commencement of the Action, until completion of construction. Each CEMP implementation report must:* – *a) be prepared by a suitably qualified professional, and*	Compliant	Defence has engaged suitably qualified professionals to manage and report on the implementation of the Project CEMP. During the ACR reporting period two CEMP Implementation Reports were prepared and submitted to the Department: – accounting for the period 27 August 2025 to 31 January 2026 and submitted on 27 February 2026 (GHD, 2026f) – accounting for the period 1 February 2026 to 31 July 2026 and submitted on 27 August 2026 (GHD, 2026h).
	– *b) include an assessment, and supporting evidence, of CEMP implementation made and collected by a suitably qualified professional.*		Each CEMP Implementation Report prepared during the ACR reporting period (GHD, 2026f) includes an assessment of implementation and supporting evidence.

Condition number	Conditions	Compliance	Evidence and supporting documentation
8) Original dated 27 May 2025	*All commitments in the CEMP, including environmental outcomes, management measures, non-compliances, incident procedure, stop work procedure, corrective measures, thresholds and performance indicators, must be SMART.* *The CEMP must be consistent with the Environmental Management Plan Guidelines and the approval holder must ensure the following:*	Compliant	Commitments, performance criteria, and management controls in all versions of the Project CEMP and associated annexures have been developed to be SMART (Specific, Measurable, Attainable, Relevant and Time-bound) and consistent with the DCCEEW EMP Guidelines. Appendix D to Version 1 – 3.1 of Project CEMP demonstrates consistency with DCCEEW EMP Guidelines (GHD, 2026a).
Governance			
8) a) Original dated 27 May 2025	*The CEMP must specify a responsible party to co-ordinate all construction associated with the Action to ensure the conditions of this approval are met.*	Compliant	The Site Environment Officer (SEO) appointed by the PMCA coordinates day-to-day construction activities in accordance with the Project CEMP and associated annexures (GHD, 2026a).
8) b) Original dated 27 May 2025	*The CEMP must identify all construction risks, define all controls required to avoid and minimise risks to protected matters from construction, and specification of governance and responsibilities, monitoring and reporting, and incident reporting and management requirements.*	Compliant	The Project CEMP identifies all construction risks applicable to project activities and includes environmental management annexures, which details controls required to avoid and minimise risks to protected matters (GHD, 2026a). The Project CEMP summarises environmental management roles, responsibilities and reporting requirements.
Dredging, turbidity and contaminants			
8) c) Original dated 27 May 2025	*The CEMP must include a water quality monitoring program that is sufficient to detect daily changes in water quality parameters and any exceedance of water quality threshold levels attributable to construction from the commencement of the Action until completion of construction. The water quality monitoring program must:* – *i) Include the monitoring of comparable control sites to determine the value of water quality parameters not subject to construction.* – *ii) During construction, require comparison on a daily basis, of both the Action area monitoring site water quality parameter results and the control site water quality parameter results against the water quality threshold levels.*	Compliant	The Project CEMP identifies water quality monitoring required for the early works activities, enabling works, construction of landside facilities including the CIF**,** the maritime trial piling exercise, and landside aspects of maritime piling activities (GHD, 2026a). No dredging works were undertaken during the ACR reporting period.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *iii) Specify values for the water quality threshold levels based on the normal range of values recorded at the control sites.* – *iv) Trigger a stop works procedure if water quality threshold levels are exceeded.*		
8) d) Original dated 27 May 2025	*The CEMP must include measures and procedures to ensure the following:* – *i) The dredging rate does not exceed 500 m3 /hour, consistent with a medium size Cutter Suction Dredger.* – *ii) A silt curtain is installed for the duration of all dredging works carried out at Armament Wharf Action area, unless otherwise advised by a suitably qualified seabird conservation ecologist.* – *iii) No dredging and spoil disposal is carried out in the Careening Bay Action area during the little penguin breeding period or little penguin moulting period or as otherwise advised by a suitably qualified seabird conservation ecologist.* – *iv) The dredge plume extent does not exceed the worst-case scenario modelling presented in the Dredge Plume Modelling Report.* – *v) The dredge spoil pipelines are placed to avoid harm to seagrass and little penguins.*	Not applicable	No dredging works were undertaken during the ACR reporting period.
8) e) Original dated 27 May 2025	*The CEMP must include measures to ensure that any instantaneous increase in Suspended Sediment Concentration (SCC) of 2 mg/L or more does not occur for more than 14 cumulative days during maritime works, including dredging and dredge spoil disposal, associated with the Action.*	Not applicable	No dredging works were undertaken during the ACR reporting period.
8) f) Original dated 27 May 2025	*The CEMP must include a risk assessment, including modelled analysis of the existing containment cap and environmental impacts of potential Tributyltin (TBT) release. This risk assessment must include a TBT monitoring*	Not applicable	No dredging works were undertaken during the ACR reporting period.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	program that can detect, within 24 hours, if TBT is being released into marine ecosystems.		
8) g) Original dated 27 May 2025	*The CEMP must include a commitment that any TBT release is remediated to ensure it causes no harm to protected matters.*	Not applicable	No dredging works were undertaken during the ACR reporting period.
Vibration and terrestrial noise			
8) h) Original dated 27 May 2025	*The CEMP must include measures to undertake a pre-construction survey of the structural condition of all little penguin nesting sites prior to the commencement of construction, to determine any structural reinforcement measures that need to be implemented to prevent collapse or damage arising from construction.*	Compliant	A (pre-construction) structural condition assessment of little penguin nesting sites was completed prior to the commencement of construction. (GHD, 2026a) (GHD, 2026g). A revised structural condition assessment was completed prior to the commencement of piling activities to assess potential structural reinforcement measures that would be required for maritime piling activities (GHD, 2026g). The outcomes of the structural condition assessment have been used to inform of any structural reinforcement measures required for little penguin nests (GHD, 2026a).
8) i) Original dated 27 May 2025	*The CEMP must include a noise and vibration monitoring program, prepared by a suitably qualified acoustic expert in consultation with a suitably qualified seabird conservation ecologist. The noise and vibration monitoring program must:* – *i) Specify terrestrial noise threshold levels (dB) and vibration threshold levels (mm/s) that will not be exceeded at any little penguin nesting sites during construction to avoid harm to little penguins and little penguin nesting sites, including the methodology relied on to establish these acoustic parameters. Vibration threshold levels and noise threshold levels must be specified for each of the following periods to reflect their different sensitivities (i) little penguin arrival period, (ii) little penguin departure period, (iii) little penguin day-time period and (iv) little penguin night-time period.* – *ii) Specify how noise and vibration levels generated by the Action during construction will be continuously monitored in order to detect any exceedance of the acoustic parameters that may harm little penguins.*	Compliant	The noise and vibration monitoring program has been developed by a suitably qualified acoustic expert in consultation with a suitably qualified seabird conservation ecologist. The program is included in the noise and vibration management annexure of the Project CEMP (GHD, 2026a) and addresses all the requirements of this Condition.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *iii) Be capable of detecting any exceedance of the terrestrial noise threshold level or vibration threshold level at the little penguin nesting sites.* – *iv) Trigger implementation of a stop works procedure if a noise threshold level or vibration threshold level is exceeded.*		
8) j) Original dated 27 May 2025	*The CEMP must specify that impact piling will not be used for construction within the Controlled Industrial Facility (CIF).*	Compliant	Section 3 of the Project CEMP specifies that piling will not be used for construction within the CIF (GHD, 2026a).
8) k) Original dated 27 May 2025	*The CEMP must specify that maritime works in the Careening Bay Action Area only occur during the period commencing 30 minutes after sunrise and ending 30 minutes before sunset, to avoid harm to the little penguins during their arrival, departure and rafting periods.*	Compliant	Section 3.4.2 of the Project CEMP sets the working hours of 30 minutes after sunrise and ending 30 minutes before sunset, for maritime construction activities in the Careening Bay and Armament Wharf Action area to avoid harm to the little penguins during their arrival, departure and rafting periods.
8) l) Original dated 27 May 2025	*The CEMP must specify that terrestrial construction in the Careening Bay Action Area within the period commencing at sunset and ending at sunrise, will:* – *i) only occur under exceptional circumstances and be minimised,* – *ii) be particularly avoided or minimised during the little penguin arrival period and little penguin departure period,* – *iii) not exceed the relevant noise threshold levels and vibration threshold levels specified in condition 8i, and* – *iv) only involve the use of the quietest available equipment that is capable of doing the task.*	Compliant	Section 3.4.2 of the Project CEMP sets construction working hours for terrestrial construction in the Careening Bay Action area. The Project CEMP also requires work times to be specified in the Construction Contractor's CEMP, and construction activities will be avoided or minimised between sunset and sunrise. If noise-generating works are required within the period commencing at sunset and ending at sunrise due to exceptional circumstances, the Project CEMP requires an out-of-hours work permit application. Section 11.1.1.5 of the Project CEMP includes the requirements for the permit.
Little penguin behaviour monitoring			
8) m) Original dated 27 May 2025	*The CEMP must include a little penguin monitoring program to detect changes in little penguin behaviour and nest stability during construction to inform adaptive management. The little penguin monitoring program must:* – *i) detail the methodology and frequency of monitoring efforts that will be carried out to obtain accurate and reliable behavioural data, and*	Compliant	The little penguin monitoring program is described within the Little Penguin Monitoring and Management Plan (RPS, 2026) (Annexure A5) to the Project CEMP (GHD, 2026a). It details the methodology and frequency of monitoring efforts and the responsibilities of the seabird ecologist to coordinate and oversee these monitoring efforts.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *ii) give overarching responsibility to a suitably qualified seabird conservation ecologist to coordinate and oversee monitoring efforts.*		
8) n) Original dated 27 May 2025	*The CEMP must specify the implementation of adaptive management measures in response to the detection of changes of behaviour in little penguins.*	Compliant	The Little Penguin Monitoring and Management Plan (RPS, 2026) (Annexure A5) to the Project CEMP (GHD, 2026a) specifies the triggers and implementation for adaptive management in response to detection of change of little penguin behaviours. This includes potential movements in and out of burrows, and changes in nesting behaviour and nesting success.
Underwater noise			
8) o) Original dated 27 May 2025. **Superseded**	*The CEMP must require that noise producing maritime works must not exceed:* – *i) The little penguin Temporary Temporal Shift value of 188 (re 1µPa2s) Sound Exposure Level (SEL) weighted for Other Carnivores in Water (OCW) and 226 peak dB (re 1 µPa) at a distance greater than 20 m from the source of sound.* – *ii) 160 dB re 1µPa² s (SEL) and 190 dB re 1 µPa (peak) for single pile strikes, at 750 m from the source or as otherwise advised by a suitably qualified acoustic specialist, to avoid behavioural disturbance to Indian Ocean bottlenose dolphins located in Cockburn Sound.*	Compliant	The maritime trial piling exercise as required by Condition 8) r) was included in the Project CEMP Versions 2 and 2.1 The results of the trial piling exercise were provided in the Armament Wharf Trial Pile Underwater Noise Monitoring Report (GHD, 2026d). The Armament Wharf Trial Pile Underwater Noise Monitoring Report (GHD, 2026d) was used to develop mitigation measures and set appropriate safety zones, including an observation zone in accordance with Condition 8) p), such that noise producing works did not exceed the values specified in Condition 8) o).
8) o) As varied on 27 May 2026. Supersedes 8) o) above	*The CEMP must commit that any noise produced by works related to piling:* *i. Are managed by implementing a 300 m safety zone, consistent with the recommendations of the Underwater Noise Modelling Assessment Report (27 April 2026) (UNMAR), that includes establishing an observation zone comprising all waters up to 250 m from the edge of the shut-down zone, where Marine Fauna Observers monitor any little penguin or other carnivores in water (OCW) approaching the shut-down zone.*	Compliant	The Underwater Noise Modelling Assessment (GHD, 2026e) informed the establishment of safety and observation zones in the Maritime Piling Management Annexure (Annexure A8) of the Project CEMP (GHD, 2026a). The Maritime Piling Management Annexure (Annexure A8) also contains measures for MFOs to monitor any little penguin or Other Carnivores in Water (OCW) approaching the shut-down zone.
	ii. Include a shut-down zone comprising all waters up to 50 m from the source of the sound, where piling must cease if any		The Maritime Piling Management Annexure (Annexure A8) of the Project CEMP (GHD, 2026a) contains a stop-work procedure for marine fauna

Condition number	Conditions	Compliance	Evidence and supporting documentation
	little penguin or OCW are observed, and where any piling is only resumed once they have been observed to have left the zone.		observed in the shut-down zone prescribed for each species. The stop work procedure requires that works may only recommence after safety zones have been visually inspected for the presence of marine fauna by trained MFOs who have confirmed that no marine fauna have been observed in the safety zones.
	iii. Ensure that, if the anticipated number of strikes per day is greater than 500, the shutdown zones must be increased in area using the corresponding distances in Appendix C of the UNMAR.		The Maritime Piling Management Annexure (Annexure A8) of the Project CEMP (GHD, 2026a) requires that if strikes per day is greater than 500, the shutdown zones must be increased in area using the corresponding distances detailed in Appendix C to the Underwater Noise Modelling Assessment (GHD, 2026e).
8) p) Original dated 27 May 2025**.** **Superseded**	*The CEMP must specify safety zones that are calculated by a suitably qualified acoustic expert and based on the modelled and verified noise levels produced by construction, to avoid harm to protected matters. The safety zones must be based on the behavioural and physiological (Temporary Temporal Shift and Permanent Temporal Shift) underwater noise threshold levels for little penguins, Indian Ocean bottlenose dolphins and other relevant marine fauna, as per Table 4.9 of Underwater Noise Impact Assessment Report (Appendix B).*	Compliant	The Underwater Noise Modelling Assessment (GHD, 2026e) addressed the requirements of this condition by validating the modelled predictions for noise levels produced by construction as per the Underwater Noise Impact Assessment Report. Safety zones were developed for little penguins, Indian Ocean bottlenose dolphins and other relevant marine fauna based on the outcomes of the Underwater Noise Modelling Assessment and were included in the Maritime Piling Management Annexure (Annexure A8) the Project CEMP (GHD, 2026a).
8) p) As varied on 27 May 2026. Supersedes 8) p) above	*To avoid harm to protected matters, the CEMP must specify the safety zones defined in Table 6.1 of the Underwater Noise Modelling Assessment Report (27 April 2026) (UNMAR) including shut down zones for cetaceans, turtles, elasmobranchs and other carnivores in water. If the anticipated number of strikes per day is greater than 500, the shutdown zones must be increased in area using the corresponding distances in Appendix C of the UNMAR.*	Compliant	Safety zones were developed for little penguins, Indian Ocean bottlenose dolphins and other relevant marine fauna based on the outcomes of the Underwater Noise Modelling Assessment Report and were included in Appendix F to the Maritime Piling Management Annexure (Annexure A8) to the Project CEMP (GHD, 2026a). The Maritime Piling Management Annexure (Annexure A8) of the Project CEMP (GHD, 2026a) requires that if strikes per day is greater than 500, the shutdown zones must be increased in area using the corresponding distances in Appendix C to the Underwater Noise Modelling Assessment (GHD, 2026e).
8) q) Original dated 27 May 2025. **Superseded**	*The CEMP must include details of underwater noise monitoring to be implemented for the duration of the maritime works at the Armament Wharf Action area.*	Not applicable	Not applicable. Condition was revoked as part of the variation on 27 May 2026, prior to maritime works at the Armament Wharf Action area commencing.

Condition number	Conditions	Compliance	Evidence and supporting documentation
8) q) As varied on 27 May 2026. Revoked	*[Revoked]*	Not applicable	Not applicable.
8) r) Original dated 27 May 2025.	*The CEMP must specify that piling, as part of the maritime works, will only commence following completion of a trial piling exercise to achieve the following outcomes:* – *i) Validate the modelled predictions for noise levels,* – *ii) Quantify the rate of sound attenuation with distance from the piling site to validate modelled predictions,* – *iii) Evaluate the efficacy of adopted noise mitigation measures to be implemented during the piling construction period at Armament Wharf Action area, and*	Compliant	The maritime trial piling exercise was completed in March 2026. The outcomes of this exercise were included in the Armament Wharf Trial Pile Underwater Noise Monitoring Report (GHD, 2026d). Outcomes required under this condition have been integrated into the Maritime Piling Management Annexure (Annexure A8) to the Project CEMP (GHD, 2026a).
	– *iv) Based on the monitoring results, re-evaluate the dimensions of the safety zones that will prevent harm from noise to marine fauna.*		Underwater Noise Modelling Assessment (GHD, 2026e) was prepared to re-evaluate the safety zones for marine fauna initially developed in Armament Wharf Trial Pile Underwater Noise Monitoring Report (GHD, 2026d). Safety zones were developed for little penguins, Indian Ocean bottlenose dolphins and other relevant marine fauna based on the outcomes of the Underwater Noise Modelling Assessment report and were included in Appendix F to the Maritime Piling Management Annexure (Annexure A8) to the Project CEMP (GHD, 2026a).
8) s) Original dated 27 May 2025. **Superseded**	*The CEMP must specify that for the duration of maritime works within the Careening Bay Action Area, the most protective combination of mitigation measures that achieves at least a 15 dB reduction in underwater noise, will be implemented. The 15 dB reduction must be based on the Armament Wharf Action area underwater noise monitoring results specified in condition 8r.*	Not applicable	This condition was varied on 27 May 2026, prior to maritime works commencing within Careening Bay Action Area, and is addressed below.
8) s) As varied on 27 May 2026.	*The CEMP must specify that for the duration of maritime works within Careening Bay Action area, the piling works must be consistent with the pile driving methodology and the pile drive energy range used to model the scenarios in the Armament Wharf Trial Pile Underwater Noise Monitoring*	Compliant	The maritime trial piling exercise, as required by Condition 8) r), has been undertaken to determine adequate management measures for noise generating maritime activities. The results and recommendations

Condition number	Conditions	Compliance	Evidence and supporting documentation
Supersedes 8) s) above	*Report (15 April 2026) (AWTPUNMR), and will implement the most protective combination of mitigation measures recommended in the AWTPUNMR to achieve a minimum underwater noise reduction of 7 dB SEL.*		of the trial piling exercise are provided in the Armament Wharf Trial Pile Underwater Noise Monitoring report (GHD, 2026d). The piling methodology and the recommendations of Armament Wharf Trial Pile Underwater Noise Monitoring report (GHD, 2026d) were integrated into the Maritime Piling Management Annexure (Annexure A8) to the Project CEMP to achieve a minimum underwater noise reduction of 7dB SEL (GHD, 2026a).
8) t) Original dated 27 May 2025.	*The CEMP must specify that, after any stoppage of 30 minutes or longer duration, maritime works will only commence:* – *i) after the safety zones have been visually inspected for the presence of little penguins, Indian Ocean bottlenose dolphins and other marine fauna by a suitably qualified marine fauna observer, who has confirmed that no marine fauna have been observed in the safety zones, and*	Compliant	Appendix B of the Maritime Piling Management Annexure (Annexure A8) to the Project CEMP (GHD, 2026a) includes the pre-start procedure whereby works can only commence after an MFO has confirmed that no marine fauna has been observed in the safety zone after any stoppage longer than 30 minutes.
	– *ii) if undertaking an impulsive noise generating activity, such as impact piling, a soft-start procedure will be used in which the piling impact energy or noise level is gradually increased from nil to full power over at least 10 minutes, allowing time for fauna to move away from the noise source and reduce the potential for injury.*		Appendix B of the Maritime Piling Management Annexure (Annexure A8) to the Project CEMP (GHD, 2026a) includes the soft-start procedures for piling activities to allow time for fauna to move away from the noise source and reduce the potential for injury to meet the requirements listed in this condition.
8) u) Original dated 27 May 2025.	*The CEMP must specify that during all maritime works, a suitably qualified marine fauna observer will monitor the safety zones, and that all maritime works will shut down immediately if any marine fauna is observed within the shutdown zone or is about to enter the shutdown zone from the low power zone or observation zone.*	Compliant	The Maritime Piling Management Annexure (Annexure A8) to the Project CEMP (GHD, 2026a) includes the requirement for marine fauna observation during the maritime piling activities and includes stop works requirements if marine fauna is observed within or are about to enter the shutdown zone.
Leaks and spills			
8) v) Original dated 27 May 2025.	*The CEMP must include:* – *i) measures to prevent leaks and spills during construction, including but not limited to hydrocarbons, and*	Compliant	The Soil and Water Quality Management Annexure (Annexure A3) to the Project CEMP (GHD, 2026a) contains management controls and measures to prevent marine and terrestrial leaks and spills during construction as well as response measures to minimise the impacts of leaks and spills to protected matters.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *ii) appropriate measures to respond to leaks and spills in a timely and effective manner to prevent and minimise impacts to protected matters.*		
Perth slider			
8) w) Original dated 27 May 2025.	*The CEMP must specify that:* – *i) within 2 weeks prior to clearing in the CIF area, a suitably qualified field ecologist will undertake an initial Perth slider salvage survey using the methods specified in the Survey guidelines for Australia's threatened reptiles* – *ii) immediately prior to undertaking clearing in the CIF area, a suitably qualified field ecologist will undertake a secondary Perth slider salvage survey, including by raking or causing similar surface disturbance to detect and relocate any Perth slider present, and* – *iii) a suitably qualified field ecologist will oversee all clearing in the CIF area to minimise harm to the Perth slider.*	Compliant	A suitably qualified field ecologist undertook initial Perth slider salvage surveys 2 weeks prior and immediately prior to clearing activities occurring and supervised all clearing activities in the CIF area. This requirement is specified in the Flora and Fauna Annexure (Annexure A1) to the Project CEMP (GHD, 2026a). The Project CEMP contains an additional requirement for surveys to occur within 48 hours of undertaking clearing.
Heritage			
8) x) Original dated 27 May 2025.	*The CEMP must include outcomes and detailed measures to avoid impacts to heritage values of Garden Island and address the recommendations of the Heritage Impact Assessment Report.*	Compliant	The Heritage Management Annexure (Annexure A2) to the Project CEMP (GHD, 2026a) has been developed to avoid impacts to heritage values and is informed by recommendations of the Heritage Impact Assessment report. This includes site induction requirements, temporary fencing of historic heritage sites, and protocols for chance finds of historic heritage and human remains.
Biosecurity			
8) y) Original dated 27 May 2025.	*The CEMP must specify biosecurity measures that will be implemented during construction to ensure the Action is undertaken in a manner that prevents:* – *i) the introduction of new pathogens, environmental weeds, or exotic marine and terrestrial species to Garden Island or Cockburn Sound that could harm the environment, and*	Compliant	The Flora and Fauna Management Annexure (Annexure A1) to the Project CEMP contains management measures to avoid the introduction of new pathogens, environmental weeds, or exotic terrestrial species to Garden Island during terrestrial activities. The Maritime Trial Piling Exercise Management Annexure (Annexure A6), Vessel Operations Management Annexure (Annexure A7), Maritime

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *ii) the spread of pathogens, environmental weeds, and exotic marine and terrestrial species to areas where they were not previously present.*		Piling Management Annexure (Annexure A8) to the Project CEMP (GHD, 2026a) includes marine biosecurity management measures
8) z) Original dated 27 May 2025.	*The CEMP must specify biosecurity measures that will be implemented during construction for the following: Phytophthora species, polyphagous shot-hole borer, carpet sea squirt, Asian green mussel, white colonial sea squirt, and black rat.*	Compliant	Biosecurity measures specific to Phytophthora species, polyphagous shot-hole borer, carpet sea squirt, Asian green mussel, white colonial sea squirt, and black rat have been specified in each version of the Project CEMP (GHD, 2026a) and are in accordance with Defence and HMAS Stirling procedures already in place.
Cumulative impacts			
8) aa) Original dated 27 May 2025.	*The CEMP must include a commitment that the schedule and timing of construction activities will be planned in consultation with a suitably qualified seabird conservation ecologist to avoid and minimise harm to little penguins, including but not limited to cumulative impacts.*	Compliant	The Project CEMP contains a commitment that the schedule and timing of construction activities will be planned in consultation with a suitably qualified seabird conservation (GHD, 2026a). Controls are detailed in the Little Penguin Monitoring and Management Plan (RPS, 2026) (Annexure A5) to the Project CEMP. This includes a schedule to inform the timing of construction activities outside sensitive periods of the annual little penguin breeding cycle.
8) bb) Original dated 27 May 2025.	*The CEMP must include a construction lighting management plan that:* – *i) is consistent with the Light Pollution Guidelines for Wildlife* – *ii) ensures all lighting from construction is directed away from little penguin nesting sites and little penguin arrival areas, and* – *iii) specifies mitigation measures to minimise the impacts of spill-over light from construction lighting on little penguins and little penguin nesting sites.*	Compliant	Section 11.1.1.3 of the Project CEMP requires the Contractor's CEMP to contain a construction lighting management plan that will be prepared by the Construction Contractor, for review and approval by the PMCA, SEO, and Base management (GHD, 2026a) to meet the requirements of the Condition.
Little penguin - population monitoring			
9) Original dated 27 May 2025.	*Prior to commencement of the Action, the approval holder must submit to the department for approval, a report prepared by a suitably qualified seabird conservation ecologist that establishes the baseline population of little penguins detailing how it was derived from relevant historical*	Compliant	The Little Penguin Baseline Population Assessment (RPS, 2025) has been prepared by a suitably qualified seabird conservation ecologist and approved by the Department prior to the commencement of Action. The assessment is published on the **Project website**.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	population data and why it is suitable for comparison to data collected after commencement of the Action.		
10) Original dated 27 May 2025.	*From the commencement of the Action, until 6 years following completion of construction, the approval holder must ensure that the little penguin population is not reduced below its baseline population size as a result of the Action.*	Compliant	The little penguin monitoring program outlined in the Little Penguin Monitoring and Management Plan (RPS, 2026) (Annexure A5) of the Project CEMP continues from the baseline monitoring period until 6 years following the completion of construction. The methodology for population monitoring includes: – routine fortnightly surveys by a suitably qualified seabird ecologist – remote camera monitoring and tracking of foraging behaviour – ongoing nesting habitat condition assessments – comparing annual breeding population estimates against baseline population levels – monitor breeding activity, breeding success, nest occupancy, moult activity, body condition and population trends – implement adaptive management where monitoring identifies nest damage, nest abandonment, chick weight loss or reduced breeding activity above baseline levels. The results of monitoring activities undertaken during the ACR reporting period are reported in CEMP Implementation Reports dated February 2026 (GHD, 2026f) and September 2026 (GHD, 2026h) which include appended little penguin monitoring field reports, quarterly reports, habitat degradation reports. The first annual little penguin monitoring report concluded that no measurable decline in little penguin population size was attributable to the SRF-West Project landside and maritime construction works during the ACR period (RPS, 2026).
11) a)-c) Original dated 27 May 2025.	*The approval holder must implement from the commencement of the Action until 6 years following completion of construction, a monitoring program designed by a suitably qualified seabird conservation ecologist that:* – *a) effectively tracks the little penguin population,* – *b) identifies the location of all little penguin nesting sites in use within the Action area, and*	Compliant	The Little Penguin Monitoring and Management Plan (RPS, 2026) (Annexure A5) to the Project CEMP describes the little penguin monitoring program designed by the suitably qualified seabird conservation ecologists. Implementation of the program is reported through the following reports which are provided to the PMCA and to the Department: – field reports – quarterly monitoring reports

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *c) is undertaken at regular intervals as advised by a suitably qualified seabird conservation ecologist.*		– habitat degradation reports – baseline behaviour characterisation report. The results of monitoring activities undertaken during the ACR reporting period are reported in CEMP Implementation Reports, dated February 2026 (GHD, 2026f) and September 2026 (GHD, 2026h).
12) Original dated 27 May 2025.	*Annually, from commencement of the Action until 6 years following completion of construction, the approval holder must provide to the department a little penguin monitoring report prepared by a suitably qualified seabird conservation ecologist that compiles the little penguin monitoring data for the previous breeding period and compare the results to the baseline population. If the little penguin population has declined below the baseline population, the report must include an assessment of the underlying cause for the decline and provide recommended management measures to mitigate the little penguin population decline.*	Compliant	During the ACR reporting period the first annual Little Penguin Monitoring Report has been prepared by a suitably qualified seabird conservation ecologist to be provided to the Department and published on the **Project website** (RPS, 2026). The first annual Little Penguin Monitoring Report concluded that no measurable decline in little penguin population size was attributable to the SRF-West Project landside and maritime construction works during the ACR period (RPS, 2026).
13) a)-d) Original dated 27 May 2025.	*Prior to the commencement of any dredging, the approval holder must provide the department with an updated Per- and polyfluoroalkyl substances (PFAS) Risk Assessment Report which has been informed by a PFAS monitoring and sampling program that includes:* – *a) assessment of the bioaccumulation pathways in Cockburn Sound,* – *b) assessment of impacts to sensitive receptors including little penguins and Indian Ocean bottlenose dolphins,* – *c) biota sampling that provides evidence to support the findings of 13a and 13b, such as sampling of little penguin prey species, non-invasive sampling of little penguins, or sampling of other higher trophic level species, and* – *d) details of any mitigation measures needed to maintain the current risk level as specified in Section 10 and 11 of the PFAS Risk Assessment Report.*	Not applicable.	No dredging activities were undertaken during the ACR reporting period.

Condition number	Conditions	Compliance	Evidence and supporting documentation
Little penguin – direct disturbance and obstruction			
14) Original dated 27 May 2025.	*The approval holder must ensure that, prior to commencement of clearing and construction, all little penguin nesting sites located within 50 m of the Action area are identified, clearly signed and demarcated and that signage is maintained until the completion of the Action.*	Compliant	Prior to the commencement of construction, little penguin nesting sites located within 50 m of the Action area were demarcated as no-go zones as required by the Project CEMP (GHD, 2026a). The SEOs undertake regular visual inspections of fencing and signage in all avoidance areas and no-go zones to check that they are intact and functional, with no signs of damage or encroachment. Inspections are captured in monthly environmental compliance reports (including site inspection records) as provided in the CEMP Implementation Reports, dated February and September 2026 (GHD, 2026f; GHD, 2026h)
15) Original dated 27 May 2025.	*The approval holder must not, as a result of taking the Action, directly disturb little penguin nesting sites.*	Compliant	The Project CEMP includes controls and mitigation measures to prevent the direct disturbance of little penguin nesting sites. This includes, but is not limited to, demarcation of nest sites as no-go zones, implementation of a noise and vibration monitoring program, minimising survey frequency (GHD, 2026a). A suitably qualified seabird ecologist undertakes fortnightly monitoring of the Careening Bay penguin colony to monitor any degrading of the burrows or changes to the rock wall from the baseline state including the potential cause of degradation. During the ACR reporting period no habitat degradation or incident involving the disturbance of little penguin nesting sites from project-related activities was reported. Little penguin habitat degradation reports are appended to the CEMP Implementation Reports (GHD, 2026f; GHD, 2026h).
16) a)-c) Original dated 27 May 2025.	*The approval holder must ensure that construction vessels and equipment do not moor in the following areas:* – *a) Rafting avoidance area* – *b) Little penguin arrival areas* – *c) Seagrass avoidance areas.*	Compliant	The Project CEMP requires that all avoidance areas and little penguin arrival areas are clearly demarcated with Global Positioning System (GPS) and provided to all vessel operators (GHD, 2026a). All construction vessels attend environmental inductions to understand environmental obligations regarding restrictions of mooring vessels and equipment in avoidance areas. Training, awareness and competency records are maintained by the Construction Contractor and provided to the SEOs as reported in the CEMP Implementation Report (GHD, 2026h).

Condition number	Conditions	Compliance	Evidence and supporting documentation
			Ongoing vessel monitoring activities are undertaken by the SEOs including verification that GPS-defined avoidance areas (including seagrass and little penguin areas) have been provided to vessel operators and uploaded to the Vessel Monitoring System (VMS). Relevant records are provided in the vessel register found in the CEMP Implementation Report (GHD, 2026h). During the ACR reporting period no incidents have occurred associated with the mooring of construction vessels in avoidance areas as detailed in the CEMP Implementation Report (GHD, 2026f).
Little penguin and Indian ocean bottle nose dolphin – leaks and spills			
17) Original dated 27 May 2025.	*The approval holder must ensure that no little penguins are harmed as a result of leaks and spills, including but not limited to hydrocarbons, caused by the taking of the Action.*	Compliant	Fuel, oil and chemical leaks and spills management controls are detailed in Soil and Water Management Annexure (Annexure A3) to the Project CEMP (GHD, 2026a). Site inspections are undertaken by the SEOs to monitor the correct implementation of measures to prevent leaks and spills of fuel, oil or chemicals to the environment and are provided in Monthly Environmental Compliance reports as appended to CEMP Implementation Reports (GHD, 2026f; GHD, 2026h) During the ACR reporting period no incidents involving harm to little penguins because of leaks and spills was caused by project-related activities (GHD, 2026h; GHD, 2026f).
18) a)-e) Original dated 27 May 2025.	*The approval holder must, prior to commencement of the Action, revise the existing Oil Spill Contingency Manual to:* – *a) include the new facilities, any new or upgraded spill response equipment, and standard operating procedures required to manage the risks associated with spills,* – *b) include a worst-case scenario of predicted spread of oil spills that considers a 30-knot easterly wind,* – *c) include specific incident management procedures for protecting sensitive values, including little penguin nesting sites, during pollution incidents,* – *d) remove plans for clean-up of the rock walls using high pressure hoses (as this may push oil into the little penguin nesting sites), and*	Compliant	This HMAS Stirling OSCM was revised in November 2024 prior to the commencement of the Action and published on the **Project website**. It was revised to contain the following procedures and details commensurate with the requirement of Condition 18.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *e) include all little penguin nesting sites in the priority areas and mapping*		
Little penguin – artificial lighting			
19) a)-c) Original dated 27 May 2025.	*To avoid and mitigate harm to Little Penguins from artificial light associated with the Action, prior to installation of any lighting, the following must be provided electronically to the department for approval by the Minister:* – *a) Final lighting plans.* – *b) A Light Impact Assessment Report, developed in consultation with a suitably qualified seabird conservation ecologist, that assesses and details impacts, including cumulative impacts to little penguins from new light installations associated with the Action.* – *c) A Light Management Plan, developed in consultation with a suitably qualified seabird conservation ecologist, that details measures that will be implemented to avoid (where possible) and mitigate potential impacts identified by the Light Impact Assessment Report in regard to little penguins and consistent with the Light Pollution Guidelines for Wildlife and details residual impacts remaining after avoidance and mitigation measures are implemented.*	Not applicable	No installation of artificial lighting has occurred during the ACR reporting period.
20) Original dated 27 May 2025.	*The approval holder must implement the Light Management Plan prior to the installation of any new lighting and continue to implement it until completion of the Action.*	Not applicable	No installation of artificial lighting has occurred during the ACR reporting period.
Little penguin - predation			
21) a)-c) Original dated 27 May 2025.	*The approval holder must, within 6 months of commencement of the Action, develop a Fox and Cat Management Plan for Garden Island. The Fox and Cat Management Plan must:* – *a) be prepared by a suitably qualified vertebrate pest control expert,*	Compliant	Version 1 of the Garden Island Fox and Cat Management Plan (FCMP) dated 27 February 2026 was prepared within 6 months of the commencement of the Action (27 August 2025) by a suitably qualified vertebrate pest control expert and published on the **Project website**. This has been superseded by Version 2 dated 22 June 2026. The FCMP seeks to implement a combination of measures as detailed in Section 7.1 to seek eradication of foxes including baiting, shooting, and trapping. Section 7.2 also provides for infrastructure enhancements to

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *b) seek to implement a combination of measures, which may include but are not limited to exclusion fencing, baiting, shooting, trapping, den fumigation or den destruction and* – *c) establish a monitoring and reporting plan that monitors progress towards fox removal.*		strengthen Garden Island's structural defences to meeting the compliance of eradication while also working at preventing fox and cat incursions. (GHD, 2026b). Section 8 and Section 12 of the FCMP also establishes a monitoring and reporting plan that monitors progress towards fox removal.
22) Original dated 27 May 2025.	*The approval holder must, within 6 months of commencement of the Action, begin implementation of the Fox and Cat Management Plan, and continue to implement it until at least 6 years after the completion of construction.*	Compliant	During the ACR reporting period the FCMP has been implemented though continued coverage, and coordination of the Department of Biodiversity, Conservation and Attraction's (DBCA) current fox monitoring and control program on Garden Island.
23) a)-c) Original dated 27 May 2025.	*The approval holder must ensure that in implementing the Fox and Cat Management Plan, the following environmental outcomes are achieved:* – *a) there is no fox or cat presence on Garden Island by the year 2030,* – *b) following eradication of foxes, Garden Island remains free of foxes until at least 6 years after completion of construction, and* – *c) Garden Island remains free of cats until at least 6 years after the completion of construction.*	Not applicable	This condition is not applicable until the completion of construction.
Little penguin and Indian ocean bottlenose dolphin – vessel strike			
24) a)-e) Original dated 27 May 2025.	*From the commencement of the Action until the completion of the Action, the approval holder must avoid and minimise harm to little penguins and Indian Ocean bottlenose dolphins by ensuring that:* – *a) No auxiliary vessels and no construction vessels operate within the Careening Bay Action Area outside the period commencing 60 minutes after sunrise and ending 60 minutes before sunset.*	Potential non-compliance	All vessel operations have occurred within the period commencing 60 minutes after sunrise and ending 60 minutes before sunset as recorded in daily vessel logs and the Monthly Environmental Compliance reports as appended to the CEMP Implementation Report (GHD, 2026h)), with the exception of an incident reported to the Department relating to vessel movement during Syngnathid translocation works (refer to Section 5). Full details regarding the incident, corrective actions, and adaptive responses were provided to the Department on 8 July 2026 in accordance with Condition 50 and 51. As of the time of this ACR being published, no response from the Department has been received.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *b) No vessels exceed a speed of 4 knots when travelling in the Careening Bay Action area or the little penguin departure area, except vessels conducting security operations or emergency operations.*	Compliant	All vessel operators must attend project environmental inductions and are made aware of the 4 knots speed limit for the Careening Bay Action area and little penguin departure area as required by the Project CEMP (GHD, 2026a). The CEMP Implementation Report, dated September 2026 (GHD, 2026h) details training, awareness and competency records maintained by the Construction Contractor as provided to the SEOs. During the ACR reporting period no incidents involving vessels travelling more than the 4-knot speed limit have occurred (GHD, 2026h).
	– *c) All vessel strikes involving little penguins or Indian Ocean bottlenose dolphins are reported to the department as an incident.*	Compliant	Environment incidents involving marine fauna are recorded in the fauna tracking and relocation register and the environmental incident register that are provided to the PMCA and reported in the six-monthly CEMP Implementation Report, dated September 2026 (GHD, 2026h; GHD, 2026f). No incident involving vessel strike to marine fauna have been recorded during the ACR reporting period (GHD, 2026h; GHD, 2026f).
	– *d) All construction vessels with outboard motors are fitted with propellor guards.* – *e) All construction vessels are fitted with a Vessel Monitoring System.*	Compliant	Ongoing vessel monitoring is undertaken by the SEOs in accordance with the requirements of the Project CEMP (GHD, 2026a). The SEOs have been provided photo evidence that applicable construction vessels are fitted with propeller guards. All construction vessels have confirmed with the SEO team that their VMS is active and vessel tracking data is available upon request. This information is captured in the Vessels Register as appended to the CEMP Implementation Report, dated September 2026 (GHD, 2026h).
Syngnathids			
25) Original dated 27 May 2025.	*The approval holder must, before the commencement of maritime works, develop a detailed strategy to minimise harm to Syngnathids. The strategy must be prepared by a suitably qualified Syngnathid ecologist and must use best practice to translocate Syngnathids from the disturbance area to a receiver site such as natural habitat, or other suitable habitat, prior to the commencement of maritime works.*	Compliant	The Syngnathid Management Plan (SMP) (GHD, 2026c) was developed by a suitably qualified Syngnathid ecologist to set out a strategy to minimise harm to Syngnathids and to translocate Syngnathids from the disturbance area prior to the commencement of maritime works. More details are provided in the SMP on the Project website.

Condition number	Conditions	Compliance	Evidence and supporting documentation
26) a)-e) Original dated 27 May 2025.	*The approval holder must ensure that all maritime works involving Syngnathids or Syngnathid habitat are planned and overseen by a suitably qualified Syngnathid ecologist. These activities must include:* – *a) Preparing a risk assessment for translocation, with consideration of the National Policy Guidelines for the Translocation of Live Aquatic Animals.*	Compliant	Section 6 of the SMP (GHD, 2026c) contains a detailed risk assessment for planned translocation which has been prepared in accordance with the National Policy Guidelines for the Translocation of Live Aquatic Animals (DAFF, 2020).
	– *b) Developing and overseeing baseline and monitoring surveys which include both diving and environmental DNA (eDNA) methodologies to:* • *i) establish the baseline species presence, abundance and distribution within the disturbance area, and* • *ii) monitor receiver sites at 1, 3, and 6 years following completion of the maritime works.*		The SMP includes baseline and monitoring surveys, using both diver observations and environmental DNA (eDNA) techniques, to document species presence, abundance, and distribution within the disturbance area before works commence. Baseline surveys were undertaken during July and August 2025 by suitably qualified marine field ecologists as documented in SMP (GHD, 2026c). The SMP also sets out a schedule for monitoring receiver sites at 1-, 3-, and 6-years post completion of maritime works. No monitoring activities have occurred yet during the ACR reporting period.
	– *c) Developing and overseeing the implementation of the translocation process, including translocation surveys.* – *d) Selecting and preparing appropriate receiver site locations, such as natural habitat or other suitable habitat.*		The SMP details the development and oversight of the entire translocation process by a suitably qualified Syngnathid ecologist, including the design and execution of pre- and post-translocation surveys. Translocation surveys during the ACR reporting period were undertaken between 27 February 2026 and 28 February 2026, 02 March 2026 and 06 March 2026 and, 25 May 2026 and 12 June 2026, and were overseen by a suitably qualified Syngnathid ecologist. Full details on Syngnathid translocation activities and personnel involved are provided in the CEMP Implementation Report (GHD, 2026h). The SMP also details the process for selecting and preparing suitable receiver sites, prioritising natural habitats or other locations with comparable environmental characteristics to the source site (GHD, 2026c).

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *e) Contribute to Syngnathid knowledge in Cockburn Sound. Prior to the translocation surveys in the seagrass disturbance area, the suitably qualified Syngnathid ecologist must engage with West Australian Marine Science Institution (WAMSI) Westport Marine Science Program and investigate opportunities to collaborate during translocation surveys by contributing reference Syngnathid specimens to the Cockburn Sound Syngnathid eDNA library.*		The approval holder has engaged with WAMSI through a suitably qualified Syngnathid ecologist to identify opportunities to contribute to Syngnathid knowledge in Cockburn Sound. It was agreed that any reference specimens for rare Syngnathid species (as defined by the suitably qualified Syngnathid ecologist) discovered during translocation surveys will be shared with WAMSI to contribute to the Cockburn Sound Syngnathid eDNA library. The suitably qualified Syngnathid ecologist will continue to coordinate with WAMSI during translocation surveys and share any nonsensitive biodiversity data as far as reasonably practicable.
27) Original dated 27 May 2025. **Superseded**	*The approval holder must ensure a translocation survey is undertaken on the same day and immediately prior to harming any Syngnathid habitat, to avoid Syngnathids recolonising the disturbance areas. Translocation surveys must include diving surveys of pylons, which are more effective at capturing seahorses, and seine netting for more cryptic Syngnathids in seagrass disturbance areas.*	Compliant	Syngnathid translocations for the trial pile exercise occurred between 27 February 2026 and 28 February 2026 and between 2 March 2026 and 6 March 2026 prior to the trial pile exercises at Armament Wharf on 9 - 10 March 2026 and 12 March 2026. 22 Syngnathids, comprising 21 *Hippocampus subelongatus* (West Australian Seahorse) and one *Filicampus tigris* (Tiger Pipefish), were translocated from the source site. Full details on Syngnathid translocation activities are provided as Syngnathid field reports in the CEMP Implementation Report, dated September 2026 (GHD, 2026h).
27) As varied on 27 May 2026. Supersedes 27) above	*The approval holder must ensure a translocation survey is undertaken no earlier than 30 days prior to harming any Syngnathid habitat, to avoid Syngnathids recolonising the disturbance areas, in accordance with advice provided by a suitably qualified Syngnathid ecologist. Translocation surveys must include diving surveys of pylons, which are more effective at capturing seahorses, and supplementary methods for more cryptic Syngnathids in seagrass disturbance areas, in accordance with advice provided by a suitably qualified Syngnathid ecologist.*	Compliant	Syngnathid translocation surveys occurred at Diamantina Pier between 25 May 2026 and 12 June 2026. The translocation activities occurred within 30 days prior to the commencement of piling activities on 22 June 2026. Translocation surveys included diving surveys of pylons, and other Syngnathid habitat impacted by maritime activities in accordance with advice provided by the suitably qualified Syngnathid ecologist as detailed in the SMP (GHD, 2026c). Translocation activities successfully translocated 209 Syngnathids to the receiver site by a suitably qualified Syngnathid ecologist, comprising 202 West Australian Seahorse and 7 Tiger Pipefish. Full details on Syngnathid translocation activities are provided as Syngnathid field reports as detailed to the CEMP Implementation Report (GHD, 2026h).

Condition number	Conditions	Compliance	Evidence and supporting documentation
28) Original dated 27 May 2025.	*The approval holder must ensure that at a minimum, translocation activities are carried out by a suitably qualified marine field ecologist, under the guidance of the suitably qualified Syngnathid ecologist.*	Compliant	All translocation activities have been undertaken by a suitably qualified marine field ecologist under the guidance of the suitably qualified Syngnathid ecologist as detailed in the SMP (GHD, 2026c). Full details on Syngnathid translocation activities including details of personnel undertaking translocation activities are provided in the Syngnathid field reports appended to the CEMP Implementation Report (GHD, 2026h).
Part B – Administrative conditions			
29) a)-e) Original dated 27 May 2025.	*The approval holder may choose to revise a plan required to be implemented under condition 19 without submitting it for approval under Section 143A of the EPBC Act, if:* – *a) The taking of the Action in accordance with the revised plan would be consistent with the approved Action,* – *b) The taking of the Action in accordance with the revised plan would be consistent with the conditions attached to this approval,* – *c) The taking of the Action in accordance with the revised plan would not be likely to have a new or increased impact, and* – *d) The approval holder notifies the department electronically that it has prepared a revised version of the plan (the 'revised plan'). In notifying the department, the approval holder must specify each condition which references the plan and provide the department with:* • *i) an electronic copy of the revised plan,* • *ii) an electronic copy of the revised plan marked up with track changes to show the differences between the plan and the revised plan,* • *iii) a comprehensive explanation of all differences between the plan and the revised plan,* • *iv) a declaration that the approval holder has read and understands the Guidance on 'new or increased impact' relating to changes to approved management*	Not applicable	No plans required under Condition 19 have been prepared during the ACR reporting period.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	plans under EPBC Act environmental approvals, Commonwealth of Australia 2017, • *v) a comprehensive analysis and detailed discussion on the likelihood that taking the Action in accordance with the revised plan will not have, or will not be likely to have, a new or increased impact,* • *vi) written notice of the date on which the approval holder will implement the revised plan (the 'revised plan implementation date'), being at least 30 business days after the date of providing notice of the revision of the plan, or a date agreed to in writing with the department, and* • *vii) a copy of the compliance report for the latest Annual Compliance Report (ACR) period and a statement of any relevant history of compliance (including non-compliance) in relation to the plan.* – *e) The approval holder must commence implementation of the revised plan from the revised plan implementation date unless otherwise notified in writing by the Minister.*		
30) a)-c) Original dated 27 May 2025.	*If the Minister notifies the approval holder that the Minister is satisfied that the taking of the Action in accordance with a plan which has been revised without submitting it for the Minister's approval would be likely to have a new or increased impact, then:* – *a) the approval holder's ability to revise a plan without submitting the plan for Minister approval does not apply, or ceases to apply, in relation to the revised plan,* – *b) the approval holder must implement the plan in force immediately prior to that revised plan or a version of the plan specified by the Minister in the notice, and* – *c) the Minister may also notify that, for a specified period, the approval holder's ability to revise a plan without submitting the plan for Minister approval does not apply for one or more specified plans.*	Not applicable	No plans required under Condition 19 have been prepared during the ACR reporting period.

Condition number	Conditions	Compliance	Evidence and supporting documentation
31) Original dated 27 May 2025.	*The approval holder may, at any time by giving written notice to the department, revoke its choice to implement a plan which has been revised without submitting it for the Minister's approval. If the approval holder revokes the choice to implement a revised plan, the approval holder must implement the plan in force immediately prior to that revised plan.*	Not applicable	No plans required under Condition 19 have been prepared during the ACR reporting period.
Submission and publication of plans			
32) Original dated 27 May 2025.	*Wherever these conditions require a plan, all such plans must be published on the website within 15 business days prior to implementation and must be submitted to the department electronically upon request within 5 business days.*	Compliant	Wherever conditions have required a plan, they have been published on the **Project website** within 15 business days prior to implementation and where required, have been submitted to the Department electronically upon request within 5 business days.
33) Original dated 27 May 2025.	*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.*	Compliant	All plans (current and superseded) published on the **Project website** are downloadable in a PDF format and will remain downloadable until the expiry date of the approval.
34) Original dated 27 May 2025.	*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 of what exclusions and redactions have been made in the version published on the website.*	Compliant	Sensitive biodiversity data has been redacted as required from version of the SMP published on the **Project website.** The Department has been notified in writing of what exclusions and redactions have been made in the version published on the website.
Commencement of the Action			
35) Original dated 27 May 2025.	*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.*	Compliant	The Department was notified electronically on the 13 August 2025 of the commencement of the Action which occurred on 27 August 2025.

Condition number	Conditions	Compliance	Evidence and supporting documentation
36) Original dated 27 May 2025.	*The approval holder must not commence the Action later than 5 years after the date of this approval decision.*	Compliant	The Approval decision date for the approval was the 27 May 2025. Notification for the commencement of the Action occurred on the 13 August 2025.
37) Original dated 27 May 2025.	*The approval holder must notify the department electronically of the date of commencement of construction, commencement of maritime works, commencement of dredging and completion of construction within 5 business days following commencement of construction, commencement of maritime works, commencement of dredging and completion of construction, respectively.*	Compliant	During the ACR reporting period, the Department was notified electronically by the approval holder for the commencement of the following activities: – notified on 13 August 2025 for the commencement of construction on 27 August 2025 – notified on 21 May 2026 for the commencement of maritime works on 19 May 2026 No dredging activities occurred during the ACR reporting period.
Compliance Records			
38) Original dated 27 May 2025.	*The approval holder must maintain accurate and complete compliance records and document the procedure for recording and storing compliance records.*	Compliant	The procedure for recording and storing compliance records is detailed in Section 12.2 of the Project CEMP (GHD, 2026a). Reports and plans required by EPBC Act approval 2024/10031 are also published on the **Project website**. The SEOs maintain accurate and complete compliance records for of environmental management activities undertaken for the Project, including but not limited to: – relevant approvals, licences and permits – copies of drawings and plans showing environmental controls – records of training and induction sessions, including attendance tracking and topics covered – environmental monitoring results, including identification of any exceedances of threshold values – records of environmental events incidents including corrective and preventative actions – CEMP implementation reports – other documents as may be required to demonstrate compliance with this the Project CEMP and EPBC Act approval 2024/10031

Condition number	Conditions	Compliance	Evidence and supporting documentation
			Compliance records relevant to EPBC Act approval 2024/10031 can be viewed on the **Project website** or are otherwise documented in the CEMP Implementation Reports (GHD, 2026f; GHD, 2026h) or this ACR.
39) Original dated 27 May 2025.	*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.*	Compliant	No requests for compliance records have been made during the ACR reporting period.
40) Original dated 27 May 2025.	*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 and Guide to providing maps and boundary data for EPBC Act projects, Commonwealth of Australia 2021, or as otherwise specified by the Minister in writing.* *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 following the end of each Annual Compliance Report Period (ACR) period, except where otherwise specified in a plan.*	Compliant	All monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval have been prepared to meet the requirements of this condition.
41) Original dated 27 May 2025.	*The approval holder must upload, at least annually, to the Atlas of Living Australia or the relevant state biodiversity database, all fauna sightings recorded during the specified monitoring activities related to this Action.*	Compliant	Fauna sighting records from vegetation pre-clearing activities at the CIF site for Perth Slider, Tammar Wallabies and other reptiles for the period covering August 2025 to March 2026 were uploaded to the Atlas of Living Australia (ALA) and DBCA biodiversity database on the 12 July 2026. Confirmation of ALA and DBCA returns are provided in the CEMP Implementation Report (GHD, 2026h). Marine fauna sightings are in process of being uploaded to ALA and DBCA biodiversity database and will be reported in the next ACR.
Annual Compliance Reporting			

Condition number	Conditions	Compliance	Evidence and supporting documentation
42) Original dated 27 May 2025.	*The approval holder must prepare a compliance report for each ACR period.*	Compliant	This ACR has been prepared for the first ACR reporting period between 27 May 2025 and 27 July 2026 with an ACR due date of 24 September 2026 (refer to Section 1.2) consistent with direction provided by the Department on the 9 September 2025. Advice provided by the Department on 26 August 2026 advised that the next ACR period will account for the period 27 May 2026 to 27 May 2027 with an ACR due date 20 business days from the 27 May 2027.
43) a)-d) Original dated 27 May 2025.	*The approval holder must ensure each compliance report includes:* – *a) Accurate and complete details of compliance and any non-compliance with:* • *i) each condition attached to this approval decision, and* • *ii) all commitments made in each plan,* – *b) A schedule of all plans in effect in relation to these conditions during the ACR period.* – *c) Accurate and complete details of how each plan was implemented during the ACR period.* – *d) If any incident occurred, accurate and complete details of each incident.*	Compliant	This ACR has been prepared to address the requirements of this condition. Refer to Section 1.2 for where each requirement is addressed in this ACR.
44) Original dated 27 May 2025.	*The approval holder must provide to the department as an attachment to the compliance report, a copy of all monitoring and verification reports as required under a condition.*	Compliant	A copy of all monitoring and verification reports as required under a EPBC Act approval 2024/10031 have been provided to the Department or published on the **Project website.**
45) Original dated 27 May 2025.	*The approval holder must ensure each compliance report is consistent with the Annual Compliance Report Guidelines, Commonwealth of Australia 2023.*	Compliant	This ACR has been developed to be consistent with the requirement of the Annual Compliance Report Guidelines. A summary of where the requirements of the Annual Compliance Report Guidelines are addressed is provided in Table 1.
46) a)-b) Original dated 27 May 2025.	*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:* – *a) each compliance report, and*	Compliant	This ACR including a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period will be published 20 business days following the end of this ACR period on the **Project website**.

Condition number	Conditions	Compliance	Evidence and supporting documentation
	– *b) a shapefile showing all clearing of protected matters, and their habitat, undertaken within the ACR period.*		
47) a)-c) Original dated 27 May 2025.	*The approval holder must:* – *a) 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.* – *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 or provision to a member of the public, and notify the department in writing of what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.* – *c) 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 or provision to a member of the public, and notify the department in writing of what exclusions and redactions have been made in the version published on the website or otherwise provided to a member of the public.*	Compliant	No redactions have been made in consideration of sensitive biodiversity data in this ACR or shapefile published on the **Project website**. Sensitive biodiversity data has been redacted from the Syngnathid Management Plan (GHD, 2026c). Notification was provided to the Department advising of the sensitive data redactions on 10 August 2026.
48) Original dated 27 May 2025.	*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.*	Compliant	The Department will be notified electronically, within 5 business days of the date of publication that the ACR has been published on the website including the web address for where the compliance report and related shapefile are published on the website.
49) Original dated 27 May 2025.	*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.*	Compliant	Each ACR version and related shapefile will remain published on the **Project website** from the first date which that compliance report must be published and until the expiry date of this approval.

Condition number	Conditions	Compliance	Evidence and supporting documentation
Reporting non-compliance			
50) a)-c) Original dated 27 May 2025.	*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:* – *a) any condition or commitment made in a plan which has not been, or may have not been, complied with,* – *b) a short description of the incident, and* – *c) the location (if applicable, including co-ordinates), date and time of the incident.*	Compliant	Defence has notified the Department electronically of reportable incidents within 2 days of becoming aware of the potential incident or potential non-compliance (refer to Section 5 for details of incidents during the ACR reporting period). Each notification to the Department has included preliminary details regarding any condition or commitment made in a plan which may have not been, complied with, a short description of the incident, and the location (if applicable, including co-ordinates), date and time of the incident.
51) a)-d) Original dated 27 May 2025.	*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:* – *a) all corrective measures and investigations which the approval holder has already taken in respect of the incident,* – *b) the potential impacts of the incident,* – *c) the method and timing of any corrective measures that the approval holder proposes to undertake to address the incident, and* – *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.*	Compliant	The Department has been provided incident reports for each incident that occurred during the ACR reporting period (refer to Table 5). Incident reports are required by the Project CEMP to be submitted Within 12 business days of the approval holder becoming aware of an incident. Incident reports must be submitted in the SRF-West Environment Incident and Event Report template provided in Appendix F of the Project CEMP (GHD, 2026a). The template provides: – corrective measures and investigations have already taken in respect of the incident, – comprehensive report regarding potential impact and performance criteria breached with respect to the incident, – recommendations for the method and timing corrective measures proposed to be undertaken, – any variation to conditions or revision of a plan that will be required to prevent recurrence of the incident and/or to address its consequences.
Independent Audit			
52) Original dated 27 May 2025.	*The approval holder must ensure that an independent audit of compliance with the conditions is conducted for every audit period.*	Not applicable	The Project CEMP requires an independent audit of compliance with the conditions every 3 years following commencement of the Action (GHD, 2026a). As the audit period has not commenced, no independent audit has been undertaken.
53)	*The approval holder must submit details of the proposed independent auditor and their qualifications to the*	Not applicable	No independent audit of compliance with the condition of approval was completed during the ACR reporting period.

Condition number	Conditions	Compliance	Evidence and supporting documentation
Original dated 27 May 2025.	*department within 10 business days following the end of each audit period.*		
54) Original dated 27 May 2025.	*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	As above.
55) Original dated 27 May 2025.	*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.*	Not applicable	As above.
56) Original dated 27 May 2025.	*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	As above.
57) Original dated 27 May 2025.	*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 to the extent that the Independent Audit and Audit Report Guidelines are consistent with these conditions.*	Not applicable	As above.
58) Original dated 27 May 2025.	*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	As above.
59) Original dated 27 May 2025.	*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	As above.
60) Original dated 27 May 2025.	*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	As above.
61)	*Within 20 business days after the completion of the Action, or at least 20 business days prior to the expiry date of this*	Not applicable	Not applicable.

Condition number	Conditions	Compliance	Evidence and supporting documentation
Original dated 27 May 2025.	*approval, 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.*		
62) Original dated 27 May 2025.	*The approval holder must notify the department electronically at least 60, but not more than 70, business days prior to the expiry date of this approval, that the approval is due to expire.*	Not applicable	Not applicable.
– *'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.* – *A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.* – *A designation of 'potentially non-compliant' is where the requirements of a condition or elements of a condition may not have not been met but the implementation of adaptive responses or corrective actions have been undertaken to ensure ongoing compliance with the condition* – *A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.*			

4. Schedule of plans

In accordance with Condition 43 b) a schedule of plans in effect for the project is provided in Table 4.

Table 4 Schedule of plans

Plan	Associated conditions	Implementation activities
SRF-West Construction Environmental Management Plan (CEMP)	Condition 6, 8	The Project CEMP has been prepared to meet the requirements of the approval and provide a framework for managing environment obligations associated with the SRF-West Priority Works. Project CEMP implementation activities undertaken during the ACR reporting period have included: • site preparation and mobilisation (including installation of fencing, signage, sound barrier etc.) • pre-clearance surveys (Syngnathid, Tammar Wallaby and Perth Slider) • weekly inspections and monthly audits assessing compliance against the environmental management controls and environmental monitoring performance criteria for each of the relevant environmental management annexures • environmental monitoring programs for water quality, dust and soil • CEMP implementation reporting.
Noise and Vibration Monitoring Program	Condition 8i	The Noise and Vibration Monitoring Program sits within the Noise and Vibration Management Annexure of the Project CEMP (GHD, 2026a). Implementation of the Noise and Vibration Monitoring Program undertaken during the ACR reporting period has included: • attended noise and vibration measurements were conducted by the suitably qualified acoustic expert on the day that construction equipment classified as high or very high emission (i.e. >80 dBA or >5 mm/s PPV at 10 m) was first used • construction and maintenance of temporary noise barrier hoarding • selection of construction equipment and methods to ensure vibration-safe working distances • use of equipment in good working condition and fitted with high performance exhaust silencers and mufflers • all equipment has been used and maintained in good working condition and fitted with high performance exhaust silencers and mufflers • use of monitors to continuously log construction noise and vibration levels to detect any exceedances of the acoustic parameters • ongoing daily and monthly noise and vibration monitoring and reporting.
Little Penguin Baseline Population Assessment	Condition 9	The Little Penguin Baseline Population Assessment (RPS, 2025) has been prepared to meet Condition 9 of EPBC Act Approval EPBC 2014/10031. Activities and surveys undertaken to support the baseline assessment was predominately based on previous surveys undertaken prior to commencement of the Action.

Plan	Associated conditions	Implementation activities
Little Penguin Behaviour Monitoring Program	Condition 8m	The Little Penguin Behaviour Monitoring Program sits within the Little Penguin Monitoring and Management Plan (Annexure A5) of the Project CEMP (GHD, 2026a). The overall scope of the plan is to monitor changes in little penguin behaviour, habitat use, and population size during the construction of the Action. Activities undertaken during the ACR reporting period include: • routine fortnightly surveys by a suitably qualified seabird ecologist • remote camera monitoring and tracking of little penguin foraging behaviour • ongoing little penguin nesting habitat condition assessments.
HMAS Stirling Oil Spill Contingency Manual V2	Condition 18	The HMAS Stirling OSCM establishes the procedures, processes and response framework for managing oil spill incidents associated with any operation activities occurring within HMAS Stirling (both project and non-project related).
Fox and Cat Management Plan (FCMP)	Condition 21	The FCMP has been prepared to meet the requirements of Conditions 21, 22 and 23 and provides a framework for managing the risks posed by invasive predators on Garden Island. Implementation of the FCMP during the ACR reporting period has focused on enhancing coverage of Defence's existing fox and cat control program with DBCA.
Syngnathid Management Plan	Condition 25	The Syngnathid Management Plan has been prepared to establish the management framework for all maritime works involving Syngnathids or Syngnathid habitat and translocation activities. Activities managed under the SMP implemented during the ACR reporting period includes: • Syngnathid baseline surveys by suitably qualified marine field ecologist including eDNA sampling • preparatory works for Syngnathid translocation sites • Syngnathid pre-clearance and translocation surveys for Syngnathids present at Diamantina Pier and at Armament Wharf to for the trial pile exercise.

5. Correcting non-compliances

No findings of non-compliance with the conditions of the approval have been advised by the Department during the reporting period.

A total of two (2) incidents were reported to the Department during the reporting period in accordance with condition 50 of the approval. One (1) incident was identified as a potential non-compliance by Defence resulting in corrective actions being undertaken to ensure ongoing compliance with condition 24 a).

In accordance with Condition 43 d) of the approval, details of incidents that have occurred during the reporting period are provided in Table 5, including the corrective actions undertaken in response to any non-compliance.

Table 5 Incident during the reporting period

Incident ID	Date	Notification Date	Relevant Condition/s	Details	Corrective actions and adaptive response
ID1	11 September 2025	12 September 2025 Full details provided on 29 September 2025	Condition 5 *The approval holder must ensure that, from the commencement of the Action until completion of construction, if any little penguin, Perth slider or marine mammal is found injured or killed within the Action area, the approval holder must immediately initiate a stop works procedure.* Condition 8 w) *The CEMP must specify that:* - *i) within 2 weeks prior to clearing in the CIF area, a suitably qualified field ecologist will undertake an initial Perth slider salvage survey using the methods specified in the Survey guidelines for Australia's threatened reptiles* - *ii) immediately prior to undertaking clearing in the CIF area, a suitably qualified field ecologist will undertake a secondary Perth slider salvage survey, including by raking or causing similar surface*	Fauna monitoring and soil grubbing works for the CIF footprint, three deceased Perth Sliders were discovered onsite by the SEO. A stop work action was enacted upon discovery of the deceased Perth sliders in accordance with the terrestrial fauna death stop work procedures outlined in the Project CEMP (GHD, 2026a).	Ecologist investigation assessed that no adaptive response or corrective actions were required as vegetation removal works were undertaken in accordance with relevant Project CEMP procedures and a stop work action was enacted in accordance with Condition 5. This included the undertaking of pre-clearance surveys and relocation activity for Perth sliders undertaken within two weeks, 48 hours, and immediately prior to vegetation clearing works for the CIF footprint by the field ecologist between 18 August to 03 October 2025. A total of five Perth sliders were discovered and relocated during pre-clearance surveys (GHD, 2026f).

			disturbance to detect and relocate any Perth slider present, and *iii) a suitably qualified field ecologist will oversee all clearing in the CIF area to minimise harm to the Perth slider.*		
ID2	Onsite environment team first became aware of incident on 19 June 2026. Incident occurred between 25 May 2026 and 12 June 2026.	Full details provided on 8 July 2026	Condition 24) a) *From the commencement of the Action until the completion of the Action, the approval holder must avoid and minimise harm to little penguins and Indian Ocean bottlenose dolphins by ensuring that:* - *a) No auxiliary vessels and no construction vessels operate within the Careening Bay Action Area outside the period commencing 60 minutes after sunrise and ending 60 minutes before sunset.*	While undertaking monitoring activities the SEO identified auxiliary vessel movements outside of the time period. The auxiliary vessel movements were associated with Syngnathid salvage and relocation. No fauna near misses, injuries or deaths were recorded during the Syngnathid translocation activities. The vessel movements associated with this activity were identified as a potential non-compliance with Condition 24) a) of the approval. This was reported to the Department, but no response has been received as of the time of this ACR being published.	To improve future sequencing and programming of vessel movements a daily activity log is now maintained for each day of activity vessel movements will be provided to the SEO for distribution. The log will include actual vessel departure and arrival times (to the minute) and an acknowledgement that works were completed per the Conditions of Approval to be signed by the suitably qualified marine field ecologist. Programming of works are also required to be conservative and factor in risks to timeframes including, change in weather, diver safety requirements and time required for fauna release to prevent late return from translocation activities. Procedures have been updated such that if the vessel cannot return to Moresby Harbour within the time limitations specified, then the vessel will return to Fremantle Port to avoid and minimise harm to marine fauna. Since the implementation of corrective actions, no incidents associated with potentially non-compliant vessel movements have occurred during the ACR reporting period.

6. New environmental risks

There were no new environmental risks identified during the ACR reporting period.

7. References

Department of Defence. (2026). *HMAS Stirling Oil Spill Contingency Manual V2 (January 2026).* Port Services-West, Garden Island, WA: Department of Defence.

GHD. (2026a). *SRF-West Priority Infrastructure Works CEMP, Rev 3.1, 12 June 2026.* Canberra ACT: GHD.

GHD. (2026b). *Garden Island Fox and Cat Management Plan (Rev 1, 27 February 2026).* Canberra, ACT: GHD.

GHD. (2026c). *Syngnathid Management Plan - SRF-West Priority Infrastructure Works (15 May 2026).* Canberra, ACT: GHD.

GHD. (2026d). *Armament Wharf Trial Pile Underwater Noise Monitoring Report (15 April 2026).* Canberra ACT: GHD.

GHD. (2026e). *Underwater Noise Modelling Assessment.* Canberra, ACT: GHD.

GHD. (2026f). *SRF-West Priority Infrastructure Works Construction Environmental Management Plan: 6 Monthly Implementation Report (27 February 2026).* Canberra, ACT: GHD.

GHD. (2026g). *Structural Condition Assessment of Little Penguin Nesting Sites.* Canberra, ACT: GHD.

GHD. (2026h). *SRF-West Priority Infrastructure Works Construction Environment Management Plan: 6-Monthly Implementation Report September 2026.* Canberra ACT: GHD.

RPS. (2025). *Garden Island Little Penguin Population Estimate.* Subiaco, WA: RPS.

RPS. (2026). *Little Penguin Annual Monitoring Report: Summary of Findings and Reporting Requirements.* RPS Consulting Group.