



Upper Swan Residential Development, WA (EPBC 2017/8062)

Satterley Property Group

2024 Independent Audit (Rev 0)

JBS&G 66423

8 August 2024





We acknowledge the Traditional Custodians of Country throughout Australia and their connections to land, sea and community.

We pay respect to Elders past and present and in the spirit of reconciliation, we commit to working together for our shared future.

Caring for Country The Journey of JBS&G
Artist: Patrick Caruso, Eastern Arrernte

Executive Summary

JBS&G have conducted an independent audit of EPBC Approval EPBC 2017/8062. The audit involved the assessment of 108 criteria across the Approval and two Management Plans. For the stage of activities being undertaken in the audit period 2023/24 there were 47 criteria that were not applicable in the audit period.

Compliance assessed against EPBC Approval EPBC 2017/8062 found that 11 conditions were found to be compliant, seven conditions were found to be complete, one condition was found to be non-compliant and two conditions were found to be potentially non-compliant.

Compliance assessed against the Management Plans found that 40 commitments were compliant and no commitments were assessed to be potentially non-compliant.

The non-compliance identified related to the undertaking of the 2022 independent audit prior to the approval of the independent audit criteria and the potential non-compliances relate to the proponent not reporting this non-compliance to the Department in the required timeframe.

Table of Contents

1.	Introduction	1
1.1	Project background	1
1.2	Objectives and Scope	1
1.3	Proponent Details	1
1.4	Environmental approval to implement project	1
2.	Current Status	1
3.	Audit Methodology	2
3.1	Purpose and scope	2
3.2	Audit period	2
3.3	Methodology.....	2
3.4	Audit terminology	2
4.	Audit Results	3
4.1	Compliance Assessment	3
4.1.1	Compliance with conditions of EPBC Approval	3
4.1.2	Compliance with Commitments of the LWMS	3
4.1.3	Conformance with Commitments of the BMP	3
4.2	Non-compliance.....	3
4.3	Potential non-compliances	4
5.	Limitations	11
6.	References	12

List of Tables

Table 3-1: Persons consulted.....	2
Table 3-2: Action implementation status (DCCEEW 2019).....	3
Table 4.1: EPBC 2017/8062 Audit table.....	5
Table B.1: Local Water Management Strategy Audit Table	14
Table C.1: Bushfire Management Plan Audit Table	18
Table D.1: Evidence Register	22

List of Figures

No table of figures entries found.

Appendices

Appendix A	EPBC Approval 2017/8062
Appendix B	Local Water Management Strategy Compliance Assessment
Appendix C	Bushfire Management Plan Compliance Assessment
Appendix D	Evidence Register
Appendix E	Auditor’s Certification
Appendix F	Auditor’s Certification

1. Introduction

This Independent Audit assesses the compliance of the Upper Swan Residential Development (the Project), located 25 km north, north-east of Perth central business district, Western Australia with the conditions in the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) decision notice EPBC 2017/8062 (Appendix A).

1.1 Project background

Satterley Property Group (Satterley) is developing the Upper Swan Development in the City of Swan, Western Australia, which involves the clearing of vegetation for residential and commercial development. Once completed the Project will comprise residential, commercial, education and public open space (POS) land uses within the 132.9 ha of development area (the project area). The development aims to create between 1600–1700 residential dwellings ranging from 150 m²–900 m² in size.

1.2 Objectives and Scope

The objective of this document is to accord with Condition 16 of EPBC 2017/8062, which requires submission of an annual independent audit of compliance with the conditions of the approval.

The scope of this document covers the reporting period commencing 23 January 2023 and 22 January 2024.

1.3 Proponent Details

The Satterley Property Group Pty Ltd is the Approval Holder, ACN 009 054 979 (Satterley).

1.4 Environmental approval to implement project

The Project was referred to the Department of Environment and Energy (DEE), now Department of Climate Change, Energy the Environment and Water (DCCEEW) in August 2017 for assessment under the EPBC Act (EPBC 2017/8062). On 19 March 2018, the delegate for the Minister of the Environment determined that the project was a controlled action requiring an assessment through preliminary documentation, with a reconsideration of decision also determining that it was a controlled action on 4 October 2018. The controlling provisions under Part 3 of the Act are listed threatened species and ecological communities (Sections 18 and 18A) namely:

- Western Swamp Tortoise (*Pseudemys umbrina*) (critically endangered)
- Clay Pans of the Swan Coastal Plain ecological community (critically endangered)
- *Corymbia calophylla* – *Xanthorrhoea preissii* woodlands and shrublands of the Swan Coastal Plain (endangered).

On 29 November 2018, Department of Agriculture, Water and the Environment (DAWE), now DCCEEW, requested further information to enable assessment through preliminary documentation, with the additional information provided on 9 April 2019. The Project was approved with conditions on 16 January 2020 (EPBC 2017/8062; Appendix A).

2. Current Status

The action commenced on 23 January 2020.

The activities undertaken during this audit period (23 January 2023 to 22 January 2024) included:

- clearing and bulk earthworks (including drainage and road works) for Stages 4 and 5 of the subdivision.
- Civil works for stages 7, 8 & 9.

Satterley undertook an external assessment of compliance for their Annual Compliance Report in April 2024 for the period covered by this audit which was submitted to DCCEEW on 22 April 2024.

3. Audit Methodology

3.1 Purpose and scope

This report has been prepared for Satterley (the approval holder) to provide to DCCEEW to fulfil the requirements of Condition 16 and 17 of the EPBC 2017/8062 (Appendix A) which states that:

*The approval holder must ensure that **independent audits** of compliance with the conditions are conducted for the 12 month period from the commencement of the action and for every subsequent 12 month period, or as otherwise requested in writing by the **Minister**.*

For each independent audit, the approval holder must:

- provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;
- only commence the independent audit once the audit criteria have been approved in writing by the Department; and
- submit an audit report to the Department within the timeframe specified in the approved audit criteria.

3.2 Audit period

This Independent Audit addresses the audit period between 23 January 2023 and 22 January 2024 for the conditions of EPBC 2017/8062 i.e. covering a 12 month period since the date of commencement of the action on 23 January 2020. This report is due to be submitted by 13 August 2024.

3.3 Methodology

The audit was undertaken during June 2024, with a desktop audit completed by Environmental Auditor Andrea Wills from JBS&G. Table 3-1 provides an overview of the personnel consulted as part of the audit.

Table 3-1: Persons consulted.

Person and Position	Organisation	Purpose
Sandy Biagioni, Regional Manager South	Satterley	To obtain verifiable evidence to assist in determining compliance with EPBC 2017/8062.

3.4 Audit terminology

The 'Status' field of audit table (refer to Table 4.1) describes the level of compliance against the approval conditions. In 2019, the DCCEEW issued the *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999* (DCCEEW 2019). Terminology from this guidance has been applied in the audit and is listed below in Table 3-2.

Table 3-2: Action implementation status (DCCEEW 2019)

Status	Acronym	Description
Compliance	C	A rating of 'compliance' is given when the auditee has complied with a condition, element of a condition, or measure required by a management plan, report or program etc.
Potential Non-compliance	PNC	A rating of 'non-compliance' is given when the auditee has not met a condition, element of a condition, or measure required by a management plan, report or program etc.
Not Applicable at time of audit	NA	A rating of 'not applicable' at the time of the audit is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced or a requirement has not been triggered.

4. Audit Results

There are 19 conditions of the EPBC 2017/8062 Approval.

4.1 Compliance Assessment

4.1.1 Compliance with conditions of EPBC Approval

The results of the audit of EPBC 2017/8062 are shown in Table 4.1. Of 34 sub-conditions of EPBC 2017/8062:

- 18 were found to be compliant, with seven were found to be 'complete';
- 13 were found to be not applicable;
- One was found to be non-compliant as per DCCEEW correspondence 15/12/2023; and
- Two were found to be potentially non-compliant.

4.1.2 Compliance with Commitments of the LWMS

The results of the audit of the Local Water Management Strategy are shown in Appendix B. Of 40 commitments audited:

- 19 were found to be compliant;
- 21 were found to be not applicable; and
- None were found to be potentially non-conformant.

4.1.3 Conformance with Commitments of the BMP

The results of the audit of the Bushfire Management Plan are shown in Appendix C. Of 34 commitments audited:

- 21 were found to be compliant;
- 13 were found to be not applicable; and
- None were found to be potentially non-conformant.

4.2 Non-compliance

The non-compliance identified related to the undertaking of the 2022 independent audit prior to the approval of the independent audit criteria which was formally reported to the DCCEEW.

4.3 Potential non-compliances

The potential non-compliances identified relate to the proponent not reporting in the required timeframe that the independent audit had been undertaken prior to the approval of the independent audit criteria.

Table 4.1: EPBC 2017/8062 Audit table

Condition	Criteria	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC Decision 2017/8062 Condition 1:		To minimise impacts to the Western Swamp Tortoise , the approval holder must not clear more than 132.9 hectares of vegetation in the area designated as the 'Project Area' in Attachment A, which is in close proximity to the only viable and naturally occurring population of the Western Swamp Tortoise in the wild.				
EPBC 1	Clear no more than 132.9ha of vegetation within the designated project area.	At all times	Aerial Image comparison	E01_Nearmap 202302 E02_Nearmap 202402	All construction and subdivision works undertaken during the audit period were located within the approved project area. No clearing was undertaken in the audit period.	Compliant
EPBC Decision 2017/8062 Condition 2:		To avoid the impacts of water pooling on the Western Swamp Tortoise , the approval holder must not construct any surface water body within 200 metres of lot 505 Almeida Parade . The approval holder must also: (a) prior to the sale of each lot, that is entirely or partially within 200 metres of lot 505 Almeida Parade , inform in writing each prospective purchaser of such a lot that a restrictive covenant will be placed on the title of the lot preventing the construction of a surface water body within 200 metres of lot 505 Almeida Parade (b) at the time of sale, place a restrictive covenant on the title of each lot, part or all of which is within 200 metres of lot 505 Almeida Parade , preventing the construction of a surface water body within 200 metres of lot 505 Almeida Parade .				
EPBC 2A	Do not construct any surface water bodies within 200m of Lot 505.	Overall	Site inspection	M01_Evidence request - Satterley Response	No construction or subdivision works have commenced within 200 m of lot 505 Almeida Parade	Not applicable
EPBC 2B	Inform each prospective purchaser that a restrictive covenant will be placed on the title of all lots within 200m of Lot 505 preventing the construction of a surface water body.	Prior to the sale of each lot that is entirely or partially within 200 m of lot 505 Almeida Parade	Check information provided to prospective buyers	M01_Evidence request - Satterley Response	No construction or subdivision works have commenced within 200 m of lot 505 Almeida Parade	Not applicable
EPBC 2C	Place a restrictive covenant on the title of all lots within 200m of Lot 505 to prevent the construction of a surface water body.	At the time of sale	Certificates of Title	M01_Evidence request - Satterley Response	No construction or subdivision works have commenced within 200 m of lot 505 Almeida Parade	Not applicable
EPBC Decision 2017/8062 Condition 3:		To avoid the impacts of water pooling on the Western Swamp Tortoise , the approval holder must ensure that all works associated with the action do not contribute any additional water into the roadside drainage system or increase water pooling along Railway Parade and are designed and constructed in consultation with the Western Australian Department of Biodiversity, Conservation and Attractions and the City of Swan to prevent water from remaining in pools. The approval holder must not commence construction of roadside drainage along Railway Parade until the Western Australian Department of Biodiversity, Conservation and Attractions and the City of Swan have each confirmed in writing that the design will prevent the creation of surface water bodies				
EPBC 3A	Design and construct the roadside drainage system in consultation with DBCA and CoS to prevent water from remaining in pools along Railway Parade.	Overall	Correspondence with DBCA and CoS	M01_Evidence request - Satterley Response	The subdivision is on the south side of Apple Street. Railway Parade is on the North side of Apple Street. The subdivision does not drain onto Railway Parade and there has been no construction of roadside drainage on Railway Parade.	Not applicable
EPBC 3B	Provide evidence of DBCA and CoS approval for construction of roadside drainage along Railway Parade.	Prior to construction of roadside drainage	Approval correspondence from DBCA and CoS	M01_Evidence request - Satterley Response	No construction of roadside drainage along Railway Parade has commenced	Not applicable
EPBC Decision 2017/8062 Condition 4:		To minimise the impacts of water pooling on the Western Swamp Tortoise as a result of dewatering activities undertaken during construction of the action, the approval holder must: (a) only undertake dewatering activities within 200 m of 'lot 505' in Attachment A for a maximum of two weeks duration during each construction phase . (b) ensure that no infiltration basins are constructed within 400 metres outside of the area designated as 'lot 505' in Attachment A. (c) ensure that all infiltration basins are fully drained within 96 hours of the conclusion of dewatering activities .				
EPBC 4A	Dewater only within 200m of Lot 505.	For a maximum of two weeks during each construction phase.	Engineering Drawings Visual inspection	M01_Evidence request - Satterley Response	No dewatering activities have been undertaken.	Not applicable
EPBC 4B	Provide a buffer of 400m for construction of infiltration basins around Lot 505.	Overall	Engineering Drawings Visual inspection	M01_Evidence request - Satterley Response	No dewatering activities have been undertaken.	Not applicable

Condition	Criteria	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 4C	Ensure that all infiltration basins are fully drained within 96 hours of the conclusion of dewatering activities.	Overall	Visual Inspection Incident Report	M01_Evidence request - Satterley Response	No dewatering activities have been undertaken.	Not applicable
EPBC Decision 2017/8062 Condition 5:		To minimise the impacts of water pooling as a result of irrigation activities on the Western Swamp Tortoise , the approval holder must implement the Local Water Management Strategy .				
EPBC 5	Implement the LWMP.	Overall	Independent Audit Report	R06_LWMS Rev 0 M01_Evidence request - Satterley Response	The LWMS was sighted during the audit. Audit of the implementation of the LWMS found that of the 40 audit criteria the following was identified: <ul style="list-style-type: none"> 19 audit criteria were found to be compliant 20 audit criteria were found to be not applicable No audit criteria were found to be potentially non-compliant 	Compliant
EPBC Decision 2017/8062 Condition 6:		To avoid and mitigate the impacts of predators and feral animals on the EPBC Act listed species and ecological communities , the approval holder must provide the equivalent of \$30,000 (by application of the National Consumer Price Index published by the Australian Bureau of Statistics indexed to its value in 2019) to the Western Australian Department of Biodiversity, Conservation and Attractions for predator and feral animal control activities in the Ellen Brook Nature Reserve. This funding must be provided to the Western Australian Department of Biodiversity, Conservation and Attractions within six months of the commencement of the action. Within two weeks of the approval holder providing the funding to the Western Australian Department of Biodiversity, Conservation and Attractions , the approval holder must provide evidence to the Department in writing that the funding (stating its actual amount) has been provided to the Western Australian Department of Biodiversity, Conservation and Attractions .				
EPBC 6A	Provide \$30,000 to DBCA for predator and feral animal control activities in the Ellen Brook Nature Reserve.	within six months of the commencement of construction	DBCA acknowledgement of funds receipt	R02_2024 Upper Swan ACR (Rev 0)	As documented in the 2024 ACR, the proponent provided evidence of payment of \$30,000 on 23/07/2020 predator and feral animal control activities in the Ellen Brook Nature Reserve in accordance with condition 6. DBCA acknowledged receipt 23/07/2020. This met the six month requirement	Complete
EPBC 6B	Notify the Department that funding has been provided to DBCA.	within six months of the commencement of construction	Department email acknowledging that condition 6 had been met	R02_2024 Upper Swan ACR (Rev 0)	As documented in the 2024 ACR, the proponent provided evidence of payment to the Department on 07/08/2020 and the Department accepted the evidence satisfied condition 6. on 14/09/2020.	Complete
EPBC Decision 2017/8062 Condition 7:		To avoid and mitigate the impacts of increased human pressure arising from the action on the Western Swamp Tortoise , the approval holder must provide the equivalent of \$20,000 (by application of the National Consumer Price Index published by the Australian Bureau of Statistics indexed to its value in 2019) to the Western Australian Department of Biodiversity, Conservation and Attractions for: <ol style="list-style-type: none"> the ongoing maintenance of the predator' proof fence around the lot 505 Almeida Parade and the Ellen Brook Nature Reserve; the construction and ongoing maintenance of a predator proof fence around lot 15; and ongoing monitoring and management of weeds in lot 505 Almeida Parade, the Ellen Brook Nature Reserve and lot 15 for the life of the approval. The approval holder must provide the funding to the Western Australian Department of Biodiversity, Conservation and Attractions within six months of the commencement of construction. Within two weeks of the approval holder providing the funding (stating its actual amount) to the Western Australian Department of Biodiversity, Conservation and Attractions , the approval holder must provide evidence to the Department in writing that the funding has been provided to the Western Australian Department of Biodiversity, Conservation and Attractions .				
EPBC 7A	Provide \$20,000 to DBCA.	within six months of the commencement of construction	DBCA acknowledgement of funds receipt	R02_2024 Upper Swan ACR (Rev 0)	As documented in the 2024 ACR, the proponent provided evidence of payment of \$20,000 on 23/07/2020 for predator proof fences and weed management in accordance with condition 7. DBCA acknowledged receipt 23/07/2020. This met the six month requirement	Complete

Condition	Criteria	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 7B	Notify the Department that funding has been provided to DBCA.	within six months of the commencement of construction	Department email acknowledging that condition 7 had been met	R02_2024 Upper Swan ACR (Rev 0)	As documented in the 2024 ACR, the proponent provided evidence of payment to the Department on 07/08/2020 and the Department accepted the evidence satisfied condition 7. on 14/09/2020.	Complete
EPBC Decision 2017/8062 Condition 8:		To avoid and mitigate the impacts of fire on the EPBC Act listed species and ecological communities, the approval holder must implement the Bushfire Management Plan for the life of the approval.				
EPBC 8	Implement the Bushfire Management Plan.	Overall	Bushfire Compliance Report	R04_BMP Rev 3 R05_Stage 8B BMP Compliance (Rev 0) R01_2024 Independent Audit Appendix C	In accordance with the structure plan Bushfire Management Plan (BMP), a subdivision BMP was prepared and included Stage 8 of the subdivision (R04). The Stage 8B BMP compliance report (R05) prepared at the completion of Stage 8B construction found that the BMP had been implemented throughout the duration of subdivisional works to achieve compliance with bushfire protection outcomes. Audit of the implementation of the BMP found that of the 34 audit criteria the following was identified: <ul style="list-style-type: none"> 21 audit criteria were found to be compliant 13 audit criteria were found to be not applicable No audit criteria were found to be potentially non-compliant 	Compliant
EPBC Decision 2017/8062 Condition 9:		To compensate for the residual significant impact of the action on aestivation habitat for the Western Swamp Tortoise , the approval holder must provide the equivalent of \$15,000 (by application of the National Consumer Price Index published by the Australian Bureau of Statistics indexed to its value in 2019) to the Western Australian Department of Biodiversity, Conservation and Attractions for the ongoing research, monitoring and management of domestic cats in the Ellen Brook Nature Reserve . The approval holder must provide the funding to the Western Australian Department of Biodiversity, Conservation and Attractions within six months of the commencement of construction. Within two weeks of the approval holder providing the funding to the Western Australian Department of Biodiversity, Conservation and Attractions , the approval holder must provide evidence to the Department in writing that the funding (stating its actual amount) has been provided to the Western Australian Department of Biodiversity, Conservation and Attractions .				
EPBC 9A	Provide \$15,000 to DBCA for ongoing research, monitoring and management of domestic cats in the Ellen Brook Nature Reserve.	within six months of the commencement of construction	DBCA correspondence acknowledging receipt of funding.	R02_2024 Upper Swan ACR (Rev 0)	As documented in the 2024 ACR, the proponent provided evidence of payment of \$15,000 on 23/07/2020 for research, monitoring and management of domestic cats in the Ellen Brook Nature Reserve in accordance with condition 9. DBCA acknowledged receipt 23/07/2020. This met the six month requirement	Complete
EPBC 9B	Notify the Department that funding has been provided to DBCA.	within six months of the commencement of construction	Department email acknowledging that condition 9 had been met	R02_2024 Upper Swan ACR (Rev 0)	As documented in the 2024 ACR, the proponent provided evidence of payment to the Department on 07/08/2020 and the Department accepted the evidence satisfied condition 9. on 14/09/2020.	Complete
EPBC Decision 2017/8062 Condition 10:		The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action				
EPBC 10	Notify the Department of the date of commencement of the action.	within 10 days after commencement	Email notification to Department that action had commenced.	R02_2024 Upper Swan ACR (Rev 0)	As documented in the 2024 ACR, the proponent notified in writing to the Department on 30/01/2020 that the action had commenced on 23/01/2020 (notification was provided within 10 business days after the date of commencement of the action)	Complete

Condition	Criteria	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC Decision 2017/8062 Condition 11:		The approval holder must maintain accurate and complete compliance records .				
EPBC 11	Maintain accurate and complete compliance records.	Overall	Independent audit assessment	R01_2024 Independent Audit Appendix B	Accurate records for all applicable conditions have been maintained. Appendix B lists the records maintained to substantiate compliance with the approval in the audit period.	Compliant
EPBC Decision 2017/8062 Condition 12:		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.				
EPBC 12	Upon request by the Department, provide compliance records.	Overall	Correspondence from the Department	M01_Evidence request - Satterley Response	The Department has not requested compliance records in the audit period.	Not applicable
EPBC Decision 2017/8062 Condition 13:		The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or otherwise in accordance with an annual date that has been agreed to in writing by the Minister. The approval holder must: <ul style="list-style-type: none"> (a) publish each compliance report on the website within 60 business days following the relevant 12 month period. (b) notify the Department by email that a compliance report has been published on the website and provide the weblink for the compliance report within five business days of the date of publication. (c) keep all compliance reports publicly available on the website until this approval expires. (d) exclude or redact sensitive ecological data from compliance reports published on the website (e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication. 				
EPBC 13A	Prepare an annual compliance report annually for the 12 month period following commencement of the action.	Overall	Annual ACR	R02_2024 Upper Swan ACR (Rev 0)	An annual compliance report for the audit period was prepared for the 12 month period 23 January 2023 and 22 January 2024 following the date of commencement 23 January 2020.	Compliant
EPBC 13B	Publish compliance report on the website	within 60 business days of anniversary of commencement of action.	Annual ACR website screenshot	C01_Satterley Upperswan ACR upload	The 2024 ACR was loaded onto the Satterley website on 22/04/2024 (within 60 business days of the anniversary of the commencement of the action). https://satterley.com.au/clementine/buying-building-resources/conservation-and-compliance-reports/	Compliant
EPBC 13C	Email weblink to the Department within five business days of publication.	within five business days of ACR publication	Correspondence to the Department	C02_EPBC 2017_8062 Upper Swan Residential Development_ WA Annual Compliance Report 2024 _SEC_OFFICIAL_	The weblink for the 2024 ACR was provided to the Department on 22/04/2024 with acknowledgement of the submission (C02) received from DCCEEW 24/04/2024.	Compliant
EPBC 13D	Keep all compliance reports publicly available.	Overall	Website Screenshot	E03_Website Screenshot 2024-06-17	The 2021, 2022, 2023 and 2024 ACR documents are all available at: https://satterley.com.au/clementine/buying-building-resources/conservation-and-compliance-reports/	Compliant
EPBC 13E	Exclude or redact sensitive ecological data from compliance reports published on the website	Overall	ACR available on website	M01_Evidence request - Satterley Response	No sensitive ecological data has been excluded or redacted from compliance reports published on the website.	Not applicable
EPBC 13F	Submit full compliance report (including any information that had been redacted from the report published on the website) to the Department.	within five business days of ACR publication	Correspondence with the Department containing the full compliance report	Refer to EPBC 13E	Refer to EPBC 13E	Not applicable

Condition	Criteria	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC Decision 2017/8062 Condition 14:		The approval holder must notify the Department in writing of any: incident ; non-compliance with the conditions; or non-compliance with the commitments made in plans . The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: <ul style="list-style-type: none"> a. any condition which is or may be in breach; b. a short description of the incident and/or non-compliance; and c. the location (including co-ordinates), date, and time of the incident and/or non-compliance. In the event the exact information cannot be provided, provide the best information available.				
EPBC 14	Notify the Department with details of incidents or non-compliance with conditions or commitments made in plans	ASAP or within 2 days	Email notification correspondence with the Department	R02_2024 Upper Swan ACR (Rev 0) C03_Query on requirement for approval of draft audit criteria _SEC_OFFICIAL_	There was a non-compliance with condition 17 in the reporting year. The independent audit (24/04/2023) was undertaken without the audit criteria being approved. JBS&G acknowledged to DCCEEW Audit Section on 27 September 2023 (C03) that the proponent was non-compliant with Condition 17(b) since 17 April 2023 (outside the required two day timeframe).	Potentially non-compliant
EPBC Decision 2017/8062 Condition 15:		The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: <ul style="list-style-type: none"> d. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; e. the potential impacts of the incident or non-compliance; and f. the method and timing of any remedial action that will be undertaken by the approval holder. 				
EPBC 15	Provide the Department with details of incidents or non-compliance with conditions or commitments made in plans	within 10 days	Email notification correspondence with the Department	C03_Query on requirement for approval of draft audit criteria _SEC_OFFICIAL_ C04_Query on requirement for approval of draft audit criteria explanation _SEC_OFFICIAL_ C05_2017-8062 -Upper Swan - Letter to close out audit	Brief details on the 17 April 2023 non-compliance with condition 17 were provided to the Department via email on 27/09/2023 (C03). The Department sent an email explaining why it was a non-compliance on 09/10/2023 (C04) followed by a letter stating that they would not be taking any compliance action at this time 15/12/2023 (C05).	Potentially non-compliant
EPBC Decision 2017/8062 Condition 16:		The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12 month period from the commencement of the action and for every subsequent 12 month period, or as otherwise requested in writing by the Minister .				
EPBC 16	Conduct independent compliance audits annually or as requested by the Minister.	Annually	Independent audit report	R03_2023 Upper Swan ACR (Rev 0) R01_2024 JBS&G Independent Audit	Independent audits have been undertaken in conjunction with the ACR for the project. The 2023 Independent Audit was reported in 24/04/2023 ACR Report (R03). In 2024, this ACR has been conducted separately from the independent audit. This report documents the findings of the independent audit.	Compliant
EPBC Decision 2017/8062 Condition 17:		For each independent audit , the approval holder must <ul style="list-style-type: none"> (a) provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; (b) only commence the independent audit once the audit criteria have been approved in writing by the Department. (c) submit an audit report to the Department within the timeframe specified in the approved audit criteria 				
EPBC 17A	Provide the name and qualification of the independent auditor and the draft criteria to the Department.	Prior to independent audit	DCCEEW approval of draft audit criteria	C06_EPBC 2017_8062 Draft Audit Criteria and Auditor Qualifications	The name and qualifications of the independent auditor and the draft audit criteria were provided to the Department 17/04/2023.	Compliant
EPBC 17B	Commence independent compliance audit once the audit criteria have been approved by the Department.	Prior to independent audit	DCCEEW approval of draft audit criteria	C03_Query on requirement for approval of draft audit criteria _SEC_OFFICIAL_ C05_2017-8062 -Upper Swan - Letter to close out audit	The 2023 independent audit commenced prior to the independent audit criteria being approved. This was substantiated as a non-compliance in the DCCEEW letter dated 15/12/2023.	Non-compliant (DCCEEW correspondence 15/12/2023)

Condition	Criteria	Timing	Verification Method	Evidence	Determination Assessment	Compliance Status
EPBC 17C	Submit independent audit within timeframe specified in the audit criteria.	within 2 months of draft audit criteria acceptance	Independent audit report submitted within 2 months of draft audit criteria acceptance	C06_EPBC 2017_8062 Draft Audit Criteria and Auditor Qualifications C07_2024 Audit Criteria Acceptance 2017-8062 - Upper swan residential development L01_Satterley Upper Swan EPBC 2017_8062 Audit Criteria Rev 1	There were no accepted audit criteria for the previous independent audit and the draft audit criteria submitted 17/04/2023 (C06) did not contain a timeframe for submission. The accepted audit criteria (L01) for this audit specifies that the Independent Audit is due within 2 months of acceptance of the audit criteria. As per the accepted audit criteria, the independent audit is due 13 August 2024 (C07).	Not applicable
EPBC Decision 2017/8062 Condition 18:		The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.				
EPBC 18	Publish the audit report on the website and keep published on the website until the end of the approval.	within 10 days of receiving the Department's approval of the audit report	Website screenshot	E03_Website Screenshot 2024-06-17	The 2021, 2022 and 2023 Independent Audit Reports (Annual Compliance Reports) were published online at: https://satterley.com.au/clementine/buying-building-resources/conservation-and-compliance-reports/	Compliant
EPBC Decision 2017/8062 Condition 19:		Within 30 days after the completion of the action , the approval holder must notify the Department in writing and provide completion data .				
EPBC 19	Notify the Department on completion of the action	within 30 days after the completion of the action	Email notification to the Department	Not applicable	The action is not complete, this condition is not applicable to this audit period.	Not applicable

5. Limitations

This report has been prepared for use by the client who has commissioned the works in accordance with the project brief only, and has been based in part on information obtained from the client and other parties.

The advice herein relates only to this project and all results conclusions and recommendations made should be reviewed by a competent person with experience in environmental investigations, before being used for any other purpose.

JBS&G accepts no liability for use or interpretation by any person or body other than the client who commissioned the works. This report should not be reproduced without prior approval by the client, or amended in any way without prior approval by JBS&G, and should not be relied upon by other parties, who should make their own enquires.

Sampling and chemical analysis of environmental media is based on appropriate guidance documents made and approved by the relevant regulatory authorities. Conclusions arising from the review and assessment of environmental data are based on the sampling and analysis considered appropriate based on the regulatory requirements.

Limited sampling and laboratory analyses were undertaken as part of the investigations undertaken, as described herein. Ground conditions between sampling locations and media may vary, and this should be considered when extrapolating between sampling points. Chemical analytes are based on the information detailed in the site history. Further chemicals or categories of chemicals may exist at the site, which were not identified in the site history and which may not be expected at the site.

Changes to the subsurface conditions may occur subsequent to the investigations described herein, through natural processes or through the intentional or accidental addition of contaminants. The conclusions and recommendations reached in this report are based on the information obtained at the time of the investigations.

This report does not provide a complete assessment of the environmental status of the site, and it is limited to the scope defined herein. Should information become available regarding conditions at the site including previously unknown sources of contamination, JBS&G reserves the right to review the report in the context of the additional information.

6. References

Department of the Environment and Energy (2019) *Independent Audit and Audit Report Guidelines for controlled actions which have been approved under Chapter 4 of the Environment Protection and Biodiversity Conservation Act 1999*

Appendix A EPBC Approval 2017/8062

Appendix B Local Water Management Strategy Compliance Assessment

Table B.1: Local Water Management Strategy Audit Table

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
LWMS 01	Table ES 1: Design principles and objectives Surface water management Criteria: maintain pre-development peak flows for events up to the 100- year Average Return Interval (ARI) event	Post Development	Not applicable	Achievement of this surface water management criteria is to be determined during post development monitoring conducted as per LWMS 34.	Not applicable
LWMS 02	Table ES 1: Design principles and objectives Surface water management Criteria: manage surface water flows from major events to protect infrastructure and assets from flooding	Post Development	Not applicable	Achievement of this surface water management criteria is to be determined during post development monitoring conducted as per LWMS 34.	Not applicable
LWMS 03	Table ES 1: Design principles and objectives Surface water management Criteria: use vegetated ephemeral storage areas (buffers, POS etc) to attenuate and treat flows prior to discharge to Ellen Brook.	Post Development	Not applicable	Achievement of this surface water management criteria is to be determined during post development monitoring conducted as per LWMS 34.	Not applicable
LWMS 04	Table ES 1: Design principles and objectives Groundwater management Criteria: minimise changes in groundwater quality following development	Post Development	Not applicable	Achievement of this groundwater management criteria is to be determined during post development monitoring conducted as per LWMS 35.	Not applicable
LWMS 05	Table ES 1: Design principles and objectives Groundwater management Criteria: subsoil drainage and drainage infrastructure set at or above the AAMGL, although existing inverts below this level may remain	Post Development	Not applicable	Achievement of this groundwater management criteria is to be determined during post development monitoring conducted as per LWMS 33.	Not applicable
LWMS 06	Table ES 1: Design principles and objectives Groundwater management Criteria: subsoil drainage outlets to be free draining.	Post Development	Not applicable	Achievement of this groundwater management criteria is to be determined during post development monitoring conducted as per LWMS 34.	Not applicable
LWMS 07	Table ES 1: Design principles and objectives Water conservation Criteria: irrigated areas will receive an average of 7500 kL/ha/yr of irrigation	On landscaping of irrigated areas	R06_LWMS Rev 0 M01_Evidence request - Satterly Response	Areas are required to receive an average of 7500 kL/ha/yr of irrigation as per the LWMS. The POS is currently being irrigated at this rate. No ponding as a result of irrigation was reported during the audit.	Compliant
LWMS 08	Table ES 1: Design principles and objectives Water conservation Criteria: use of water efficiency initiatives such as hydrozoning, use of drought tolerant plants and community education.	During landscaping	E04_Hydrozoning POS 8B8C E12_Clementine-Landscaping-Aug-22	Drought tolerant plants have been utilised in the development (E04) with hydrozoning evident in POS (E04). Satterley provide a waterwise front garden landscaping package to home homeowners which includes waterwise tree, shrub and groundcover planting (E12).	Compliant
LWMS 09	Table ES 1: Design principles and objectives Monitoring and implementation Criteria: maintain groundwater quality at pre-development levels (median winter concentrations) and if possible improve the quality of water leaving the project area to Ellen Brook	Post Development	Not applicable	Achievement of this design principle and objective is to be determined during post development monitoring conducted as per LWMS 35.	Not applicable
LWMS 10	Table ES 1: Design principles and objectives Monitoring and implementation Criteria: design methodology based on WSUD treatment train including structural measures and non- structural measures to reduce nutrient loads.	During construction and Post construction before handover	Refer to LWMS 25, LWMS 26 and LWMS 27	Refer to LWMS 25, LWMS 26 and LWMS 27	Compliant
LWMS 11	4.1 Water supply and wastewater Sewer infrastructure will be provided via the construction of two permanent wastewater pump stations linking sewer flows ultimately to the Water Corporation Millhouse Road Wastewater Pump Station to the south of the project area (Cossill and Webley 2016).	During construction	C09_Audit Evidence Request Response 01	Satterley advised (C09) that one of the two permanent wastewater pump stations is currently under construction.	Compliant
LWMS 12	4.1 Water supply and wastewater Water supply will be provided via an extension of the existing Water Corporation pipe infrastructure in Rose Street (Cossill and Webley 2016).	During construction	E06_6161-9A-500_0 Water Reticulation	Water supply drawings for Stage 9A (E06) show that water supply is provided via an extension to the Water Corporation pipe infrastructure on Rose Street.	Compliant

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
LWMS 13	4.3.1 Stormwater management system - Major drainage system Minor roads will be graded to direct flow overland to the lowest point in each catchment. The ultimate road low point will be adjacent to POS, with overflow flood storage provided within the POS and/or foreshore envelope (Figure 4-2 and Figure 4-3). The open space design should aim to create flood storage in an informal manner, minimising formal drainage storage areas. Major event storages are anticipated to be turfed to form useable POS areas.	During construction	E07_6161-9A-610_2 Road Drainage and Stormwater	Minor roads in stage 9A (E07) are graded to direct flow to side entry pits which are ultimately piped to the POS and overflow into the foreshore reserve.	Compliant
LWMS 14	4.3.1 Stormwater management system - Major drainage system All lot finished levels will have a minimum 0.3 m clearance above the estimated 100-year ARI flood level in the road and POS.	During construction	R06_LWMS Rev 0 E07_6161-9A-610_2 Road Drainage and Stormwater	The 100 year flood level in the Stage 9A POS is 12.00 (R06). The minimum Stage 9A lot level is 14.02 (E07) (greater than 0.3 m clearance).	Compliant
LWMS 15	4.3.1 Stormwater management system - Major drainage system All lot finished levels will have a minimum 0.5 m clearance above the estimated 100-year ARI flood level of the detention storages and Ellen Brook.	During construction	R06_LWMS Rev 0 E07_6161-9A-610_2 Road Drainage and Stormwater	The 100 year ARI level for Ellen Brook at Stage 9A is 10.50 (R06). The minimum Stage 9A lot level is 14.02 (E07) (greater than 0.5 m clearance).	Compliant
LWMS 16	4.3.1 Stormwater management system - Major drainage system An outlet pipe will be used to control flow volumes into Ellen Brook. Vegetated swales or a spillway structure will then be used to allow water to discharge from the storage area into Ellen Brook at flow rates not greater than the pre-development flow rates.	During construction	E07_6161-9A-610_2 Road Drainage and Stormwater E11_6161-8B-610_A Roadworks and Stormwater Drainage	There is a 600 mm outlet pipe at each of the vegetated POS at Stage 9A and Stage 8B / 8C which are used to control the major flow volumes into Ellen Brook. Post development monitoring will confirm that flow rates are no greater than 12.26 m ³ /s.	Compliant
LWMS 17	4.3.1 Stormwater management system - Major drainage system Peak post-development discharge to Ellen Brook is at 11.7 m ³ /s, slightly below the pre-development discharge of 12.3 m ³ /s. This is consistent with the design objectives and principles.	Post development	Not applicable	Achievement of this objective is to be determined during post development monitoring conducted as per LWMS 34.	Not applicable
LWMS 18	4.3.1 Stormwater management system - Major drainage system Top water levels in a major event will be no greater than 1.2 m for safety reasons. Major event basins have been designed with a batter of 1 in 6.	During construction	E13_1601016 POS 8B8C POS E11_6161-8B-610_A Roadworks and Stormwater Drainage	The inlet for Stage 8B / 8C POS is 13.60 and the outlet is 13.30 (no greater than 1.20 m). POS for Stage 8B / 8C has batter of approximately 1 in 6	Compliant
LWMS 19	4.3.1 Stormwater management system - Minor drainage system Where the post-development depth to the impervious layer is more than 1.5 m and lots are greater than 450m ² in size, lots will use soakwells to infiltrate the 1 hour duration, 1-year ARI storm event of 15 mm. In all other scenarios, lot connections will be provided.	During construction	E07_6161-9A-610_2 Road Drainage and Stormwater E11_6161-8B-610_A Roadworks and Stormwater Drainage	Lot connections are provided for all lots in Stage 8B and Stage 9A (E07, E11).	Compliant
LWMS 20	4.3.1 Stormwater management system - Minor drainage system Treatment of stormwater in vegetated storages within detention storages sized to treat the first 15 mm of rainfall. This is approximately the 1 hour duration, 1-year ARI storm event, which comprises 99% of the total annual runoff volume (DoW 2011).	During construction	E13_1601016 POS 8B8C POS	Stage 8B / 8C detention basin is vegetated and sized to contain the first 15 mm of rainfall.	Compliant
LWMS 21	4.3.1 Stormwater management system - Minor drainage system Kerb breaks and flush kerbing to be utilised around POS and swales to encourage overland flow.	During construction	E15_Flush Kerbing 1 E16_Flush Kerbing 2 E17_Flush Kerbing 3	Flush kerbing is utilised around the entire development including POS and swales (E15, E16, E17).	Compliant
LWMS 22	4.3.1 Stormwater management system - Minor drainage system Where required, pipe drains sized to convey runoff from the 5-year ARI storm event.	During construction	E11_6161-8B-610_A Roadworks and Stormwater Drainage	Pipe drains on minor drainage system are sized to at least 300 mm (E11).	Compliant
LWMS 23	4.3.1 Stormwater management system - Minor drainage system All stormwater storage areas will be fitted with subsoil drainage to ensure that these areas are dry between rainfall events. In the 1 hour duration, 1-year ARI event, flow is only anticipated to occur through the subsoil system.	During construction	E14_6161-8B-750 Subsoil Drainage E11_6161-8B-610_A Roadworks and Stormwater Drainage	Subsoil drainage is included in Stage 8B basin (E14, E11).	Compliant
LWMS 24	4.3.1 Stormwater management system - Minor drainage system Peak post-development discharge by the subsoil drainage system to Ellen Brook is estimated at 0.46 m ³ /s, which is similar to, but slightly below, the pre-development discharge of 0.59 m ³ /s. This is consistent with the design objectives and principles.	Post development	Not applicable	Achievement of this objective is to be determined during post development monitoring conducted as per LWMS 34.	Not applicable

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
LWMS 25	4.5 Water quality management - Non-structural source controls Non-structural source controls to reduce nutrient export from the project area will focus on reducing the need for nutrient inputs into the landscape. Non-structural strategies proposed include species will be selected for drought tolerance and low fertiliser requirements.	During landscaping	E04_Hydrozoning POS 8B8C	Plant species that are drought tolerant and have low fertiliser requirements have been utilised for POS (E04).	Compliant
LWMS 26	4.5 Water quality management - Non-structural source controls Non-structural source controls to reduce nutrient export from the project area will focus on reducing the need for nutrient inputs into the landscape. Non-structural strategies proposed include street sweeping.	Post construction before handover	E08_Wormall Inv 29912 E09_LD Total Invoice	Street sweeping and litter collecting for Clementine Estate occurs every Friday (E09). Street sweeping of construction area for Stage 5 is undertaken by Wormall (E08).	Compliant
LWMS 27	4.5 Water quality management - Structural source controls The following structural controls are considered appropriate for the project area: <ul style="list-style-type: none"> the use of bio-retention storages and swales to treat road runoff in events up to and including the 1 in 1 year, 1 hour event. A minimum treatment capacity of approximately 2% of the connected impervious area should be provided. The bio-retention system will be sized to function correctly with a saturated hydraulic conductivity (ksat) of 3 m/day to the specifications of Table 4-5. a trash rack installed downstream of each vegetated treatment area or at the upstream end of the storage overflow to manage gross pollutants. 	During construction	E07_6161-9A-610_2 Road Drainage and Stormwater	Swale used to treat stormwater upstream of outlet to foreshore with pollutant trap upstream of outlet into swale (E07).	Compliant
LWMS 28	5.2.1 Dewatering Prior to the commencement of any dewatering, the construction contractor will apply for and obtain a "Licence to Take Water" from DoW. All dewatering will be carried out in accordance with the conditions of this licence.	During construction	M01_Evidence request - Satterly Response	No dewatering activities have been undertaken in the audit period.	Not applicable
LWMS 29	5.2.1 Dewatering Where possible, construction will be timed to minimise impacts on groundwater and any dewatering requirement.	During construction	Refer to LWMS 28	Refer to LWMS 28	Not applicable
LWMS 30	5.2.1 Dewatering Dewatering will be managed through re-infiltration on site where feasible.	During construction	Refer to LWMS 28	Refer to LWMS 28	Not applicable
LWMS 31	5.2.2 Acid sulphate soils ASS will be investigated and managed in accordance with the applicable Department of Environment Regulation (DER) guidance and requirements of dewatering licences as they arise.	During construction	C10_Audit Evidence Request Response 02 E08_Wormall Inv 29912	Geotechnical investigation prior to the project found that acid sulphate soils are not applicable to the Allara Project. No potential acid sulphate soils have been intercepted during excavation activities. Provision for treatment of acid sulphate soils is in the Wormall contract in accordance with the ASSDMP if required as highlighted in the Stage 5 invoice (E08).	Not applicable
LWMS 32	5.3 Stormwater system operation and maintenance The operation and maintenance of the drainage system will initially be the responsibility of the developer, ultimately reverting to the local authority, CoS. The surface and subsoil drainage system will require regular maintenance to ensure its efficient operation. It is considered the following operating and maintenance practices will be required periodically: <ul style="list-style-type: none"> removal of debris to prevent blockages street sweeping to reduce particulate build up on road surfaces and gutters. maintenance of vegetation in Bio-retention Systems/ Storages as outlined in the UWMP cleaning of sediment build up and litter layer on the bottom of Storages as specified in the UWMP undertake education campaigns regarding source control practices to minimise pollution runoff into stormwater drainage system checking and maintenance of subsoil drainage function. 	Post construction	E08_Wormall Inv 29912 E09_LD Total Invoice	Wormall Invoice (28/06/2024) (E08) includes: <ul style="list-style-type: none"> street sweeping of construction area for Stage 5 final clean-up sweeping and grading for Stage 5 disposal of rubbish on construction site Street sweeping and litter collecting for Clementine Estate occurs every Friday (E09).	Compliant
LWMS 33	5.4.1 Post-development monitoring Groundwater level [Water level (m AHD)] via Electrical depth probe or similar from four locations (one each in Catchments 1, 4, 7B, 9 and 11).	Post development Quarterly for three years (February, May, August, October)	Not applicable	Monitoring will not commence until the development has been completed.	Not applicable

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
LWMS 34	5.4.1 Post-development monitoring Surface water quantity [Stage (flow inferred)] via Continuous logger from outlets of basins for catchments 4 and 7B.	Post development Downloaded three times per year for three years	Refer to LWMS 33	Refer to LWMS 33	Not applicable
LWMS 35	5.4.1 Post-development monitoring Groundwater quality via Pumped bore samples from four locations (one each in Catchments 1, 4, 7B, 9 and 11) analysed for: <ul style="list-style-type: none"> In situ: pH, EC, temperature Laboratory: TN, Kjeldahl nitrogen, ammonia, nitrate, nitrite, TP, filterable reactive phosphorus, total dissolved salts, selected heavy metals. 	Post development Quarterly for three years (February, May, August, October)	Refer to LWMS 33	Refer to LWMS 33	Not applicable
LWMS 36	5.4.1 Post-development monitoring Surface water quality collected via grab sampler from outlets of basins for catchments 4 and 7B analysed for: <ul style="list-style-type: none"> In situ: pH, EC, temperature Laboratory: TN, Kjeldahl nitrogen, ammonia, nitrate, nitrite, TP, filterable reactive phosphorus, total dissolved salts, selected heavy metals. 	Post development Three times per year while flowing for three years	Refer to LWMS 33	Refer to LWMS 33	Not applicable
LWMS 37	Table 5-2: Criteria for assessment and contingencies (Groundwater level) Groundwater levels not to exceed the estimated phreatic line by more than 300 mm. Contingency Actions: 1. Review design and operation of subsoil and stormwater drainage system. 2. Perform maintenance as required.	After monitoring event	Refer to LWMS 33	Refer to LWMS 33	Not applicable
LWMS 38	Table 5-2: Criteria for assessment and contingencies (Surface water quantity) Flow discharging from storage basins to be within peak flows established in LWMS. 1. Review design and operation of stormwater drainage system. 2. Perform maintenance as required.	Annual review of water quantity targets	Refer to LWMS 33	Refer to LWMS 33	Not applicable
LWMS 39	Table 5-2: Criteria for assessment and contingencies (Groundwater quality) Nutrient levels within the project area should not exceed the maximum recorded pre-development level. 1. Identify and remove any point sources. 2. Consider reinforcement of community education/awareness programs. 3. Review operational and maintenance measures. 4. Consider modifications to stormwater system. 5. Consider initiation of community based projects.	Annual review	Refer to LWMS 33	Refer to LWMS 33	Not applicable
LWMS 40	Table 5-2: Criteria for assessment and contingencies (Surface water quality) Assess performance of vegetated storages in nutrient reduction. Water quality discharging from the project area should not exceed the maximum recorded pre-development level. 1. Identify and remove any point sources. 2. Consider reinforcement of community education/awareness programs. 3. Review operational and maintenance measures. 4. Consider modifications to stormwater system. 5. Consider initiation of community based projects.	Annual review	Refer to LWMS 33	Refer to LWMS 33	Not applicable

Appendix C Bushfire Management Plan Compliance Assessment

Table C.2: Bushfire Management Plan Audit Table

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
BMP 01	3.1 Asset Protection Zones all lots within 100 m of Class B Woodland vegetation to the north and west (associated with Ellen Brook) will be constructed in accordance with BAL 12.5 with a minimum 36 m APZ in the form of POS and road reserve	During Construction	R05_Stage 8B BMP Compliance (Rev 0)	Table 4 of the BMP Compliance Report shows that there is no Class B woodland vegetation associated with the Stage 8B area.	Not applicable
BMP 02	3.1 Asset Protection Zones all lots within 100 m of Class B woodland vegetation to the north-east will be constructed in accordance with BAL 12.5 with a minimum 36 m APZ consisting of POS	During Construction	Refer to BMP 01	Refer to BMP 01	Not applicable
BMP 03	3.1 Asset Protection Zones all lots within 100 m of Class C shrubland vegetation to the west and northwest of the project will be constructed in accordance with BAL 19 and BAL 12.5 with a minimum 16 m APZ consisting of POS and/or a road reserve.	During Construction	R05_Stage 8B BMP Compliance (Rev 0)	BMP Compliance Report Appendix G contains BAL certificates for the eight lots located within BAL 12.5 in a bushfire prone area. The five lots outside the bushfire prone area within BAL 12.5 are not required to construct in accordance with AS 3959.	Compliant
BMP 04	3.1 Asset Protection Zones The APZs are low fuel areas around each building and are required to be maintained on a regular and ongoing basis at a fuel load less than 2 tonnes per hectare (t/ha) to achieve a low threat minimal fuel condition status all year round. Overstorey trees can be retained to some extent within the APZ provided all flammable material including understorey grasses, weeds, shrubs and scrub are removed from the fuel profile, essentially creating a managed parkland cleared landscape, which would result in a diminishing level of radiant heat, ember attack and fire rate of spread at the dwelling interface.	Post development	E10_Hazard-Reduction-Notice-2023-24	This commitment is to be fulfilled by the landowner as per the City of Swan Firebreak Notice (E10) issued with the landowner rates.	Not applicable
BMP 05	3.1 Asset Protection Zones This is also consistent with requirements under City of Swan Fire Season Guide for areas of land less than 5001 m ² to be clear of all flammable material, with all grasses to be maintained below 5 cm in height.	Post development	R05_Stage 8B BMP Compliance (Rev 0)	The BMP Compliance Report confirms that the ongoing requirements of the current City of Swan annual firebreak notice have been met and recommend that this should continue to be implemented as required, particularly with regards to ongoing fuel management of vacant land.	Compliant
BMP 06	3.1 Asset Protection Zones In addition, all trees, bushes and shrubs are to be trimmed back over driveways and accessways to all buildings to 3 m wide with a clear vertical axis for emergency services access in accordance with the City of Swan Fire Season Guide. Lawns, managed gardens, paving, driveways and swimming pools are also suitable within the APZ. Buildings are not permitted within the APZ.	Post development	E10_Hazard-Reduction-Notice-2023-24	This commitment is to be fulfilled by the landowner as per the City of Swan Firebreak Notice (E10) issued with the landowner rates.	Not applicable
BMP 07	3.1.1 On-site staging buffers If the proposed development is undertaken in a staged basis then vegetation clearing will be required to advance where necessary to ensure building construction is not inhibited by a temporary vegetation extent located on a future development stage that is yet to be cleared. This can be achieved by ensuring each approved stage subject to construction is surrounded by a 100 m wide, on-site cleared or low threat vegetation buffer prior to building construction.	During Construction	R05_Stage 8B BMP Compliance (Rev 0)	Photos and inspection comments in the BMP Compliance Report confirm that staging buffers are in place during construction.	Compliant
BMP 08	3.1.1 On-site staging buffers Once the buffers are created, they will need to be maintained on a regular and ongoing basis at a fuel load less than 2 t/ha to achieve a low threat minimal fuel condition all year round until such time that the buffer area is developed as part of the next development stage. This will manage the bushfire risk from on-site temporary vegetation during development staging.	During Construction	C08_Satterley BMP Commitment Letter	Satterley commit to the maintenance of staging buffers in a letter dated 30/10/2023.	Compliant
BMP 09	3.1.1 On-site staging buffers This measure will be confirmed following confirmation of proposed lot layout and development staging provisions and will be documented in a brief addendum to this BMP to accompany future subdivision applications where appropriate.	During Construction	R05_Stage 8B BMP Compliance (Rev 0)	Figure 2 of the BMP compliance and condition clearance report shows the construction staging buffer for Stage 8B (100 m of clearing in advance of building) which is covered in the Stage 8A Bushfire Management Plan.	Not applicable

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
BMP 10	<p>3.3 Vehicular access</p> <p>The indicative public road network outlined in the Site Overview (Figure 1) is appropriate for the purposes of satisfying the intent of Element 3 of the Guidelines at this strategic planning stage as there are greater than two access routes to the surrounding road network currently proposed and no cul-de-sacs, battle-axe blocks, private driveways longer than 50 m, emergency access ways or fire service access routes currently proposed.</p>	During Design	R05_Stage 8B BMP Compliance (Rev 0)	The BMP compliance report confirms that this requirement has been addressed during the preparation of the BMP compliance report which involved assessment of the project area.	Compliant
BMP 11	<p>3.3 Vehicular access</p> <p>This will be confirmed as part of future stages of planning whereby a minimum of two different vehicular access routes will be provided for all stages of development, both of which connect to the surrounding public road network, provide safe access and egress to two different destinations and are available to all residents/the public at all times and under all weather conditions.</p>	During Design	R05_Stage 8B BMP Compliance (Rev 0)	<p>The BMP Compliance Report confirms that there is an internal road network (multiple connecting routes) leading to</p> <ul style="list-style-type: none"> • Middle Swan to the south via Railway Road • Aveley and Ellenbrook to the west via Railway Road then West • Swan Road • Bullsbrook to the north via Railway Road 	Compliant
BMP 12	<p>3.3 Vehicular access</p> <p>Should temporary vehicular access to a second access route be required, particularly in the early stages of development, then Emergency Access Ways (EAWs) or Fire Service Access Routes (FSARs) will need to be considered to achieve this.</p>	During Design	R05_Stage 8B BMP Compliance (Rev 0)	The BMP Compliance Report states that no emergency access ways are required for Stage 8B as there are multiple access routes available.	Not applicable
BMP 13	<p>3.3 Vehicular access</p> <p>Technical requirements for vehicular access components that may form part of proposed development will be met in accordance with Table 2. Vehicular access components of proposed development will be confirmed as part of subdivision design and demonstration of compliance with the relevant acceptable solutions for Element 3 of the Guidelines will be documented in a brief addendum to this BMP or a revised to accompany future subdivision applications where appropriate.</p>	During construction	R05_Stage 8B BMP Compliance (Rev 0) E11_6161-8B-610_A Roadworks and Stormwater Drainage R04_BMP Rev 3	Table 3 of the BMP Compliance Report (R05) indicates that two different vehicular access routes are provided. Civils drawings (E11) show that minor roads are 6m wide and that all three cul-de-sacs are 6m as per the requirements of Table 2 of the BMP (R04).	Compliant
BMP 14	<p>3.3 Vehicular access</p> <p>Should the subdivision design change prior to development, cul-de-sacs, battle-axe blocks, private driveways longer than 50 m, emergency access ways or fire service access routes will all be avoided where possible and planned against. Should any of these be unavoidable, then technical requirements outlined in Table 2 (Table 4 of the guidelines) will be met.</p>	Should the subdivision design change prior to development	R05_Stage 8B BMP Compliance (Rev 0) E11_6161-8B-610_A Roadworks and Stormwater Drainage	The BMP Compliance Report (R05) confirms that the proposed subdivision design has been implemented during construction (E11). No reassessment against the technical guidelines has been necessary.	Compliant
BMP 15	<p>3.3 Vehicular access</p> <p>Firebreaks will not be required throughout the residential lot component of proposed development since these lots will be of a size that will not trigger firebreak requirements; however, firebreaks may be required for larger lots (such as POS or easements) in accordance with acceptable solution A3.8 and the CoS annual firebreak notice (Appendix 4).</p>	Ongoing	R05_Stage 8B BMP Compliance (Rev 0)	The BMP Compliance Report confirms that the ongoing requirements of the current City of Swan annual firebreak notice have been met and recommend that this should continue to be implemented as required.	Compliant
BMP 16	<p>3.4 Reticulated water supply</p> <p>Water supply services will be extended throughout the project from surrounding areas of residential development, which will result in provision of a reticulated mains water supply for proposed residences.</p>	During construction	R05_Stage 8B BMP Compliance (Rev 0)	The Water Reticulation Plan (BMP Compliance Report Appendix C) confirms that the reticulated water supply (bonded to the City) is not required to be fully constructed prior to issue of titles. As such, this item (including hydrants) will be installed at a future date.	Not applicable
BMP 17	<p>3.4 Reticulated water supply</p> <p>A network of hydrants will also be provided along the internal road network at locations which meet relevant water supply authority and DFES requirements.</p>	During construction	Refer to BMP 18	Refer to BMP 18	Not applicable

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
BMP 18	3.5 Notification on Title: Notification on title be placed on all proposed lots with a BAL of 12.5 or greater as a condition of subdivision to ensure all landowners/proponents and prospective purchasers are aware that their lot is in a designated bushfire prone area and that increased building construction standards will apply to future buildings. The notification on title is also to include that the site is subject to a Bushfire Management Plan. An example of this may be 'this lot is located within a bushfire prone area and is subject to a BAL 12.5/19/29 rating and the associated construction standards. This lot is also subject to the requirements of a Bushfire Management'.	On creation of title	E05_DP426310 Deposited Plan Stage 8B	The proponent has provided the survey of the Stage 8B lots with a BAL rating above 12.5 to Landgate marked with the requirement for a "new Notification and Memorial" under Section 165 of the P&D Act 2005 for a Bushfire Management Plan on lots 113-117, 314-316, 460-465 and 468-470. Landgate are to include the required notification on creation of the title.	Not applicable
BMP 19	3.5 BAL assessment at future planning stages: Management measures recommended in the BMP for individual dwellings (i.e. BAL ratings and APZs) are currently based on indicative lot locations (i.e. a concept subdivision plan) and bushfire prone vegetation of which may change at some future stage. Consequently, BALs will be reassessed following any modification to the surrounding vegetation extent or proposed lot layout.	On modification to the surrounding vegetation extent or proposed lot layout	R05_Stage 8B BMP Compliance (Rev 0) E11_6161-8B-610_A Roadworks and Stormwater Drainage	The BMP Compliance Report confirms that the proposed vegetation and proposed lot layout have been implemented during construction (E11). No reassessment has been necessary.	Compliant
BMP 20	3.5 Compliance with the City of Swan annual fire season guide: the developer/land manager and prospective land purchasers are to comply with the current City of Swan annual fire season guide and bushfire information (Appendix 4).	Ongoing	R05_Stage 8B BMP Compliance (Rev 0)	The BMP Compliance Report confirms that the ongoing requirements of the current City of Swan annual firebreak notice have been met and recommend that this should continue to be implemented as required, particularly with regards to ongoing fuel management of vacant land.	Compliant
BMP 21	3.5 Prepare Bushfire Compliance Report: the developer is to prepare a Bushfire compliance report to clear subdivision conditions and ensure mitigation and management outlined within this BMP are implemented and adhered to. This will be prepared at the subdivision stage of planning.	Subdivision stage of planning	R05_Stage 8B BMP Compliance (Rev 0)	The BMP compliance report confirms that this requirement has been addressed during the preparation of the BMP compliance report which involved assessment of the project area.	Compliant
BMP 22	5. Implementation and enforcement Implementation of the BMP applies to the developer, local government and prospective landowners to ensure bushfire management measures are adopted and implemented on an ongoing basis.	Overall	R05_Stage 8B BMP Compliance (Rev 0) R04_BMP Rev 3	The BMP Compliance Report (R05) confirms that Satterley are implementing the BMP (R04) for Stage 8B.	Compliant
BMP 23	5.1 Document review This BMP will be updated as necessary following the date of approval to ensure: 1. Implementation is assessed and corrective actions are applied in cases of non-compliance. 2. The effectiveness and impact of fire prevention work is evaluated and any significant changes in development design or the surrounding environment are reassessed in a revised BMP.	Overall	R05_Stage 8B BMP Compliance (Rev 0) R04_BMP Rev 3	The BMP (R04) has not been revised since the November 2017 submission (Rev 3) to LSP was approved. The BMP Compliance Report has not identified any cases of non-compliance or there is the requirement for reassessment. Note: The BMP Compliance Report (R05) refers to the current structure plan BMP as being prepared in November 2015 and not November 2017 (R04). However, the first revision (Rev A) of the BMP was dated June 2016.	Compliant
BMP 24	The developer will be responsible for updating and revising the BMP until such time that the development is complete, after which time the landowner will be responsible for updating and revising the BMP as required.	Overall	R05_Stage 8B BMP Compliance (Rev 0) R04_BMP Rev 3	The BMP Compliance Report (R05) confirms that Satterley are implementing the BMP (R04) for Stage 8B.	Compliant
BMP 25	Table 4: Proposed works program FMP 1a Developer to create and maintain APZs in accordance with acceptable solution A2.1 of the Guidelines 3. Bushfire Compliance Report to be prepared to clear subdivision conditions	To be created during subdivisional works and maintained until transfer of land	R05_Stage 8B BMP Compliance (Rev 0)	Table 2 of the BMP Compliance Report (R05) confirms that suitably sized APZ have been provided and low threat vegetation is being maintained.	Compliant
BMP 26	Table 4: Proposed works program FMP 1b Local Government and private landowners to maintain APZs in accordance with acceptable solution A2.1 of the Guidelines	Ongoing following transfer of land	Not applicable	This commitment is outside the scope of this audit (following transfer of land). City to monitor compliance annually.	Not applicable
BMP 27	Table 4: Proposed works program FMP 1c Local Government to maintain POS in a low threat minimal fuel condition in accordance with exclusion clause 2.2.3.2 (f) of AS3959	Ongoing following transfer of land	Not applicable	This commitment is outside the scope of this audit (following transfer of land). City to monitor compliance annually.	Not applicable

Condition	Criteria	Timing	Evidence	Determination Assessment	Compliance Status
BMP 28	Table 4: Proposed works program FMP 1d Developer to construct and maintain staging buffers in a low threat minimal fuel condition in accordance with exclusion clause 2.2.3.2 (f) of AS3959 Bushfire Compliance Report to be prepared to clear subdivision conditions	To be created during subdivisional works and maintained through to subdivisional works on adjacent stages	R05_Stage 8B BMP Compliance (Rev 0)	Table 3 of the BMP Compliance Report confirms that, following inspection of the foreshore reserve/POS and Stage 8B project area, the inspector is satisfied that the vegetation has been reduced to and is currently being managed in a low fuel state consistent with Schedule 1 of the Guidelines (APZs) and Clause 2.2.3.2 (f) of AS 3959.	Compliant
BMP 29	Table 4: Proposed works program FMP 2b Landowner/builder to construct buildings in accordance with AS 3959 BAL compliance to be provided as part of Bushfire Compliance Report	At the building construction stage	Not applicable	This commitment is outside the scope of this audit (building application to City stage).	Not applicable
BMP 30	Table 4: Proposed works program FMP 3 Developer to construct public access network Bushfire Compliance Report to be prepared to clear subdivision conditions	During subdivisional works	R05_Stage 8B BMP Compliance (Rev 0)	The BMP Compliance Report confirms that there is an internal road network (multiple connecting routes) leading to <ul style="list-style-type: none"> • Middle Swan to the south via Railway Road • Aveley and Ellenbrook to the west via Railway Road then West • Swan Road • Bullsbrook to the north via Railway Road 	Compliant
BMP 31	Table 4: Proposed works program FMP 4 Developer to construct reticulated water supply and network of hydrants Bushfire Compliance Report to be prepared to clear subdivision conditions	During subdivisional works in accordance with the Water Reticulation Plan	R05_Stage 8B BMP Compliance (Rev 0)	<ul style="list-style-type: none"> • The Water Reticulation Plan (BMP Compliance Report Appendix C) confirms that the reticulated water supply (bonded to the City) is not required to be fully constructed prior to issue of titles. As such, this item (including hydrants) will be installed at a future date. 	Not applicable
BMP 32	Table 4: Proposed works program FMP 5a All parties to comply with City annual firebreak notice City to monitor compliance annually	Ongoing all year round	R05_Stage 8B BMP Compliance (Rev 0)	The BMP Compliance Report confirms that the ongoing requirements of the current City of Swan annual firebreak notice have been met and recommend that this should continue to be implemented as required, particularly with regards to ongoing fuel management of vacant land.	Compliant
BMP 33	Table 4: Proposed works program FMP 5b WAPC to place Condition Section 70 Notification on Title	At subdivision approval	E05_DP426310 Deposited Plan Stage 8B	The proponent has provided the survey of the Stage 8B lots with a BAL rating above 12.5 to Landgate marked with the requirement for a "new Notification and Memorial" under Section 165 of the P&D Act 2005 for a Bushfire Management Plan on lots 113-117, 314-316, 460-465 and 468-470.	Pending
BMP 34	Table 4: Proposed works program FMP 5c Developer to Prepare Bushfire Compliance Report Bushfire Compliance Report to be prepared to clear subdivision conditions	Following completion of subdivisional works	R05_Stage 8B BMP Compliance (Rev 0)	The BMP compliance report confirms that this requirement has been addressed during the preparation of the BMP compliance report which involved assessment of the project area.	Compliant

Appendix D Evidence Register

Table D.3: Evidence Register

Code	Reference	Author	Electronic	Hard-copy	Topic
C01	C01_Satterley Upperswan ACR upload	Satterley	X		Correspondence from Satterley confirming that ACR has been loaded onto the Satterley Clementine website 22/04/2024.
C02	C02_EPBC 2017_8062 Upper Swan Residential Development_ WA Annual Compliance Report 2024 _SEC_OFFICIAL_	JBS&G	X		Submission of Upper Swan Annual Compliance Report and 2022 Independent Audit
C03	C03_FW_ Query on requirement for approval of draft audit criteria _SEC_OFFICIAL_	DCCEEW /JBS&G	X		Email communication with the Department on the submission of independent audit criteria.
C04	C04_Query on requirement for approval of draft audit criteria explanation _SEC_OFFICIAL_	DCCEEW	X		Email explanation from DCCEEW on condition 17 breach.
C05	C04_2017-8062 -Upper Swan - Letter to close out audit	DCCEEW	X		Letter from the Department advising that no further action will be taken in regard to non-compliance with condition 17.
C06	C06_EPBC 2017_8062 Draft Audit Criteria and Auditor Qualifications	JBS&G	X		Submission of Draft Audit Criteria and Auditor Qualifications for 2022 Independent Audit
C07	C07_2024 Audit Criteria Acceptance 2017-8062 - Upper swan residential development	DCCEEW	X		Acceptance letter from DCCEEW of Upper Swan audit criteria 13/06/2024.
C08	C08_Satterley BMP Commitment Letter	Satterley	X		Satterley commitment letter to JBS&G to undertake low threat

Code	Reference	Author	Electronic	Hard-copy	Topic
					vegetation assessment and maintenance of staging buffers
C09	C09_Audit Evidence Request Response 01	Satterley	X		Satterley email advice to JBS&G that the WWPS is currently under construction with attached civil drawings.
C10	C10_Audit Evidence Request Response 02		X		Satterley email advice to JBS&G that no acid sulphate soils have been identified during the project.
E01	E01_Nearmap 202302	JBS&G	X		Nearmap image from February 2023
E02	E02_Nearmap 202402	JBS&G	X		Nearmap image from February 2024
E03	E03_Website Screenshot 2024-06-17	JBS&G	X		Website screenshot of Satterley Eden Beach website containing EPBC documents.
E04	E04_Hydrozoning POS 8B8C	Plan \ E	X		Plan \ E Landscape Architects Clementine Estate Foreshore POS 8B/8C Landscape Construction Levels and Grading Drawing
E05	E05_DP426310 Deposited Plan Stage 8B	MNG	X		McMullen Nolan Group Deposited Plan 426310 for Stage 8B Subdivision
E06	E06_6161-9A-500_0 Water Reticulation	Cossill & Webley	X		Stage 9A Water Reticulation Plan [6161-9A-500_0]
E07	E07_6161-9A-610_2 Road Drainage and Stormwater	Cossill & Webley	X		Stage 9A Roadworks and Stormwater Drainage Plan [6161-9A-610_2]
E08	E08_Wormall Inv 29912	Wormall	X		Wormall Civil Tax Invoice 29912 for Clementine Stage 5 Civils

Code	Reference	Author	Electronic	Hard-copy	Topic
E09	E09_LD Total Invoice	LD Total	X		LD Total Tax Invoice 137406 for Clementine Estate
E10	E10_Hazard-Reduction-Notice-2023-24	City of Swan	X		Bush Fires Act 1954 City of Swan Fire Hazard Reduction Notice (Firebreak Notice) 01/11/2023 to 30/04/2024
E11	E11_6161-8B-610_A Roadworks and Stormwater Drainage	Cossill & Webley	X		Stage 8B Roadworks and Stormwater Drainage Plan [6161-8B-610_A]
E12	E12_Clementine-Landscaping-Aug-22	Satterley	X		Clementine Upper Swan Landscaping Package Terms and Conditions
E13	E13_1601016 POS 8B8C POS	Plan \ E	X		Plan \ E Landscape Architects Clementine POS 8B/8C Hard and Soft Landscape Works May 2022
E14	E14_6161-8B-750 Subsoil Drainage	Cossill & Webley	X		Stage 8B Subsoil Drainage Plan [6161-8B-750_A]
E15	E15_Flush Kurbing 1	Satterley	X		Satterley Clementine website photo example of development flush kerbing near POS
E16	E16_Flush Kurbing 2	Satterley	X		Satterley Clementine website photo example of development flush kerbing near verge
E17	E17_Flush Kurbing 3	Satterley	X		Satterley Clementine website photo example of development flush kerbing near verge
L01	L01_Satterley Upper Swan EPBC 2017_8062 Audit Criteria Rev 1	JBS&G	X		Letter submission to DCCEEW with draft audit criteria

Code	Reference	Author	Electronic	Hard-copy	Topic
M01	M01_Evidence request - Satterly Response	Satterley	X		Evidence provided by Satterley to verify compliance with conditions.
R01	R01_2024 JBS&G Independent Audit	JBS&G	X		This Independent Audit Report
R02	R02_2024 Upper Swan ACR (Rev 0)	JBS&G	X		The 2024 Annual Compliance Report
R03	R03_2023 Upper Swan ACR (Rev 0)	JBS&G	X		The 2023 Annual Compliance Report / Independent Audit Report
R04	R04_BMP Rev 3	JBS&G	X		Upper Swan Development Bushfire Management Plan
R05	R05_Stage 8B BMP Compliance (Rev 0)	JBS&G	X		Stage 8B Clementine Estate, Upper Swan Bushfire Management5 Plan Compliance and Condition Clearance Report
R06	R06_LWMS Rev 0	JBS&G	X		Local Water Management Strategy Upper Swan Residential Development Precinct

Appendix E Auditor's Certification

Andrea Wills, Auditor, JBS&G Level 9 Allendale Square, 77 St Georges Terrace, Perth WA

SAI Global Lead Auditor in Environmental Management Systems

SAI Global BSB51904 Diploma of Business (Quality Auditing)

I, Andrea Wills, certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature:



Date: 08/08/2024

Appendix F Auditor's Certification

Andrew Winzer, Principal, JBS&G Level 9 Allendale Square, 77 St Georges Terrace, Perth WA

Exemplar Global Certified Environmental Management System Lead Auditor

SAI Global BSBAUD501 Initiate a Quality Audit

SAI Global BSBAUD503 Lead a Quality Audit

SAI Global BSBAUD504 Report on a Quality Audit

I, Andrew Winzer, certify that, to the best of my knowledge, all information provided in the audit report attached to this audit certification statement is true, correct and complete.

I am aware that section 491 of the EPBC Act makes it an offence in certain circumstances to knowingly provide false or misleading information or documents to specified persons who are known to be performing a duty or carrying out a function under the EPBC Act or the regulations. The offence is punishable on conviction by imprisonment for not more than 1 year, a fine not more than 60 penalty units, or both.

I am aware that section 461(4) of the EPBC Act makes it an offence in certain circumstances for an environmental auditor to include a statement in an audit report that is false or misleading in a material particular. The offence is punishable on conviction by imprisonment for not more than 6 months.

Signature:



Date: 08/08/2024

© JBS&G

This document is and shall remain the property of JBS&G. The document may only be used for the purposes for which it was commissioned and in accordance with the Terms of Engagement for the commission. Unauthorised use of this document in any form whatsoever is prohibited

Document Distribution

Rev No.	Copies	Recipient	Date
0	1: Electronic	Sandy Biagioni, Satterley	08/08/2024

Document Status

Rev No.	Author	Reviewer Name	Approved for Issue Name	Signature	Date
0	A. Wills	A. Winzer	A. Winzer		08/08/2024



Adelaide

Kaurna Country | 100 Hutt St,
Adelaide, SA 5000
T: 08 8431 7113

Brisbane

Turrbal/Yuggera Country | Level 37, 123
Eagle Street, Brisbane, QLD 4000
T: 07 3211 5350

Bunbury

Wardandi Noongar Country | 177
Spencer Street Bunbury, WA 6230
T: 08 9792 4797

Canberra

Ngunnawal Country | Level 1, The Realm
18 National Circuit Barton, ACT 2600
T: 02 6198 3278

Darwin

Larrakia Country | Suite G1, Level 1
48-50 Smith Street, Darwin NT 0800
T: 08 8943 0600

Hobart

Muwununa/Nuenon Country | Level 6,
111 Macquarie Street Hobart, TAS 7000
T: 03 6108 9054

Melbourne

Kulin Country | Level 5, 10 Queen
Street, Melbourne, VIC 3000
T: 03 9642 0599

Newcastle

Awabakal/Worimi Country | 61 / 63
Parry Street Newcastle West, NSW 2302
T: 02 8245 0300

Perth

Whadjuk Nyoongar Country | Allendale Square,
Level 9, 77 St Georges Terrace, WA 6000
T: 08 9380 3100

Sydney

Gadigal Country | Level 1, 50
Margaret Street, Sydney, NSW 2000
T: 02 8245 0300

Wollongong

Dharawal Country | Suite 1A, 280 - 286
Keira Street, Wollongong, NSW 2500
T: 02 4225 2647