



# North Head Quarantine Station Conservation and Adaptive Reuse Project

## Environmental Audit 2011



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## Environmental Audit 2011



**Submitted To**  
Office of Environment and Heritage  
and  
Mawland Quarantine Station Pty Ltd

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## INTRODUCTION

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### Background

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The North Head Quarantine Station was in operation from 1828 until 1984. Its purpose was as a place to isolate immigrants to Australia who were liable to be, or suspected of, carrying an infectious disease. The site has national heritage cultural significance, and is also a significant part of the landscape of Sydney Harbour.

*“The primary significance of the North Head and the Quarantine Station is its historical and social significance; and its association with administration, arrival and public health. It is also significant for its contemporary associations with the descendants of internees; and for its Aboriginal and natural values. The significance of the place is strongly reflected in its intactness and its ability to demonstrate all phases of its history and to convey a sense of its uniqueness through its setting and the nature of its buildings and other elements. Strong meanings are embodied in the landform, the vegetation, the harbour and the sea.”*

**North Head Quarantine Station Conservation Management Plan** (National Parks and Wildlife Service, 2000)

In 1984, the Quarantine Station was transferred to the National Parks and Wildlife Service (NPWS) which has since become part of the Office of Environment and Heritage (OEH), and which has managed the site on behalf of the public. The Quarantine Station site forms part of Sydney Harbour National Park. The site covers 31 hectares and includes 67 heritage buildings.

### **Conservation and Adaptive Reuse Proposal**

NPWS commenced seeking private sector involvement to lease the Quarantine Station and take over the day-to-day management of the site in 1987, and Mawland Hotel Management Pty Ltd (MQS) was selected as the preferred tenderer for the conservation and adaptive reuse of the site in 1996.

An EIS was prepared for the project in 2001 (Manidis Roberts, 2001), along with a species impact statement (SIS) (Gunninah Environmental Consultants, 2001) covering the threatened species on site, and the Heritage Council approved the Detailed Area Conservation Management Plans (DACMP).

The intended use of the site by the Minister for the Environment (representing NPWS) and MQS (the co-proponents) was set out in a Preferred Activity Statement. The co-proponents proposed to adapt and re-use the Quarantine Station site for cultural tourism purposes and sought a 21-year planning approval. The proposed uses included: a visitor centre and museum; guided tours; a restaurant; accommodation; functions and conferences; and an environmental and cultural study centre.

The proposal attracted significant community interest, and public submissions were reviewed and addressed as part of the approval process.

The Minister for the Environment granted concurrence for the activity in accordance with Section 112D of the Environmental Planning and Assessment Act on 6<sup>th</sup> January 2003. The joint determination report (*North Head Quarantine Station Conservation and Adaptive Re-use Proposal*, henceforth referred to as the Conditions of Approval or CoA) under Clause 243, Part 5 of the Environmental Planning and Assessment Act 1979, was authorised by the NSW Minister for the Environment, the Director NSW Heritage Office, and the Chief Executive Maritime Authority on 23<sup>rd</sup> December 2003.

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### ***Implementation of the Project***

The Quarantine Station site was leased to MQS on 26<sup>th</sup> October 2006 for the purpose of implementing the conservation and adaptive reuse proposal. The lease is for a period of 21 years with potential extensions of 16 and 9 years, respectively.

Conservation and adaptation works in accordance with the CoA were commenced early in 2007, including the adaption of some buildings to provide hotel, restaurant and conference facilities. The Quarantine Station was opened as a hotel in April 2008. Hotel operations are undertaken under contract by Mirvac Hotel Services.

The site has now been occupied by MQS for more than five years, and the hotel and related services have been operating for more than three and a half years.

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### **Key Planning and Approval Documents**

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Key documents in the project approval process are listed below. These documents, together with relevant legislation, represent the legal and regulatory basis for the project. These documents are referred to in this Environmental Audit Report by the abbreviations shown.

#### ***EIS***

Manidis Roberts Consultants *Environmental Impact Statement - Proposal for the Conservation and Adaptive Re-use North Head Quarantine Station Sydney Harbour National Park* (2000)

#### ***PAS***

Department of Environment and Conservation and Mawland Hotel Management Pty Ltd *Preferred Activity Statement* 2003

#### ***CoA***

Minister for the Environment, NSW Heritage Council, *NSW Waterways Authority North Head Quarantine Station Conservation and Adaptive Re-use Proposal Clause 243 Report* under Part 5 of the Environmental Planning and Assessment Act 1979 – Joint Determination Report by the Determining Authorities

[This document contains the **Conditions of Planning Approval** for the project as determined by the consent authorities]

#### ***CMP***

National Parks and Wildlife Service *Sydney Harbour National Park North Head Quarantine Station Conservation Management Plan* 2000

#### ***DACMP***

National Parks and Wildlife Service *Sydney Harbour National Park North Head Quarantine Station Detailed Area Conservation Management Plan* 2001

#### ***EMP 2005***

Department of Environment and Conservation *North Head Quarantine Station Environmental Management Plan* 2005

#### ***IMAMS***

Mawland Hotel Management Pty Ltd *Integrated Monitoring and Adaptive Management System for the Conservation and Adaptive Re-use of the Quarantine Station* 2006

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### **Environmental Audit Requirements**

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The Conditions of Planning Approval provide for comprehensive external environmental

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audits of the project throughout its life.

The first comprehensive environmental audit was undertaken during the construction phase of the project in April 2007 by GHD Pty Ltd.

Further comprehensive environmental audits are to be undertaken at five yearly intervals from the commencement date for the duration of the project. The current audit, undertaken in December 2011, is the first of these audits.

### Conditions of Planning Approval

Provisions of the Conditions of Planning Approval relating to comprehensive environmental audits are:

226) A comprehensive audit of the activity shall be prepared by a suitably qualified, experienced and independent person in accordance with the timeframes specified in condition 228, for the duration of the activity. The audit process shall be consistent with ISO 14010 – Guidelines and General Principles for Environmental Auditing and ISO 14011 – Procedures for Environmental Auditing, or updated versions of these.

227) The co-proponents shall meet the cost of the comprehensive audit. The appointment of the auditor shall be approved by the DEC and DIPNR.

228) Preparation of the first comprehensive audit report shall coincide with the conclusion of stage 2 of the staging plan (condition 31). Subsequent comprehensive audit reports shall then be undertaken every 5 years after the commencement date, although this may be adjusted if agreed by the DEC to link with the timing of the annual environmental reports (condition 223).

229) The audit shall address, but not be limited to:

- a) the environmental performance of the activity and its effects on the environment;
- b) compliance by the co-proponents with the approval conditions;
- c) the adequacy of the integrated monitoring program and EMP;
- d) the adequacy of measures taken or proposed by the co-proponents to respond to issues arising from:
  - the integrated monitoring program; and
  - consultations with the community;
- e) consideration of the key impact predictions made in the EIS and PAS using information from the integrated monitoring program;
- f) the adequacy and functioning of the information management and GIS system (once in place – conditions 66 - 69); and
- g) any other matters considered necessary by the DEC, Heritage Council, Waterways Authority or DIPNR.

The audit report may recommend measures or actions to improve the environmental performance of the activity and/or its environmental management and monitoring systems, if these are considered necessary.

230) A draft comprehensive audit report shall be submitted by the auditor to the co-proponents, DEC, DIPNR, NSW Heritage Council, Waterways Authority, NSW Fisheries and the Quarantine Station Community Committee for comment.

231) In submitting the report in accordance with condition 230, the auditor shall identify a timeframe for the receipt of comments. As a minimum, the organisations listed in condition 230 shall have 6 weeks to provide comment, starting from the date on which they receive the report. An extension of the timeframe for comments may be agreed between the relevant organisation(s) and the auditor.

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232) The auditor shall consider comments received from the organisations listed in condition 230 and prepare and submit a final audit report to the DEC and DIPNR. Based on the outcomes of the final audit report, and after considering any comments provided by the organisations listed in condition 230, the DEC and/or DIPNR may require the co-proponents to address certain matters identified in the audit. The co-proponents shall comply with any such requirements.

233) If, after considering the outcomes of the comprehensive audit, the DEC, DIPNR and/or the co-proponents consider that significant revisions to the undertaking of the activity or mitigative measures are required to protect the significance of the site, any such proposed revisions will be submitted to the Minister for Infrastructure, Planning and Natural Resources. Prior to the Minister for Infrastructure, Planning and Natural Resources agreeing to any significant revisions, the details of the proposal are to be made available for public comment. The co-proponents shall comply with any directions of the Minister.

*Note: Condition 226)* The standards ISO14010 and ISO14011 referred to in condition 226 have been withdrawn and replaced by *ISO19011:2011 Guidelines for auditing management systems*. The audit process is therefore to be conducted in accordance with ISO19011:2011.

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### **Scope of Environmental Audits**

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The purpose of the Comprehensive Environmental Audits is to assess:

- (1) the impacts on the environment from the activity; and
- (2) compliance by the co-proponents with the approval conditions.

In making this assessment, the auditor should:

- a) determine compliance by the co-proponents with the approval conditions;
- b) determine conformance by the co-proponents with the approved Environmental Management Plan (EMP);
- c) determine compliance by the co-proponents with any other matters raised by OEH, Heritage Council, Waterways Authority or DIPNR;
- d) determine the adequacy of the integrated monitoring program and EMP (with reference to ISO14001:2004 );
- e) determine the adequacy of the development and implementation of the information management and GIS system (with reference to the EMP); and
- f) determine the adequacy of measures taken or proposed by the co-proponents to respond to issues arising from:
  - the integrated monitoring program (with reference to key impact predictions made in the EIS and PAS) ; and
  - consultations with the community.

The auditor is required to present a detailed report including any instances of non-conformance and non-compliance with these assessment requirements.

The audit report may recommend measures or actions to improve the environmental performance of the activity and/or its environmental management and monitoring systems, if these are considered necessary. In the case of serious non-compliance with approval conditions or the potential for adverse impacts on the environment, the report may recommend immediate regulatory action by OEH.

The Auditor is required to make use of a standard environmental audit protocol prepared by Graham A Brown & Associates (GABA) in September 2006, as an aid to comprehensive coverage of the issues and to provide for consistency among the successive audits that are to

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be undertaken over the life of the project. However, the Auditor is required to use professional judgement as to the matters to be considered as part of the audit.

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### Environmental Audit Protocol

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The standard environmental audit protocol is structured as a series of questions structured on the basis of the Conditions of Approval and the standard *AS/NZS ISO 14001:2004 Environmental Management Systems – requirements with guidance for use*. The CoA do not require that the project be managed using an Environmental Management System compliant with the AS/NZS ISO 14001 Standard, but the standard was considered to provide guidance in leading practice in environmental management.

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### Conduct of the December 2011 Audit

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Graham A Brown & Associates were commissioned to undertake the December 2011 Comprehensive Environmental Audit on 30<sup>th</sup> November 2011. The opening meeting for the audit took place at the Quarantine Station on 21<sup>st</sup> December 2011.

The audit process involved a site visit, review of written Management Assertions and documentary evidence, and interviews with OEH, MQS and Mirvac staff. The site visit took place on 13<sup>th</sup> and 14<sup>th</sup> February 2012.

The following staff were interviewed as part of the audit process:

Name	Position
Maxwell Player	Director
Suzanne Stanton	Corporate Counsel
Luke Strauss	Associate Legal Counsel
Louise O'Flynn	Environmental Performance Manager
Peter Hay	Area Manager
Zac Hope	General Manager
Rachel Lawrence	Heritage Curator
Todd Durrant	Site Manager
Helen Drew	Visitor Services Manager

The audit team would like to thank the participating staff, particularly Louise O'Flynn and Luke Strauss for their assistance in preparing material for this audit.

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### Stakeholder Consultation

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In accordance with CoA Conditions 230 to 232, a draft version of this Environmental Audit Report was provided to stakeholder organisations including relevant Government agencies and the Quarantine Station Community Committee for comment on 5<sup>th</sup> April 2012.

Stakeholder comments were considered by the auditors in the preparation of the final report.

Details of the consultation process, comments received, and the auditors' consideration of these comments are set out in Attachment 4.

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## ENVIRONMENTAL AUDIT EXECUTIVE SUMMARY

This Environmental Audit is conducted at a point 5 years from the commencement of the conservation and adaptive reuse project. Capital works commenced on the site in early 2007 and the hotel and associated facilities commenced operation in April 2008.

In September 2006, as part of the development of project documentation, Graham A Brown & Associates (GABA) were commissioned to develop an audit protocol for independent environmental audits of the project which provides a basis for evaluation of the projects compliance with the Conditions of Project Approval (CoA) and with leading practice in environmental management based on the standard AS/NZS ISO 14001. An independent audit of the project based on this protocol was conducted in 2007 by GHD Pty Ltd.

In undertaking this audit, the GABA team are returning to the project after a period of 5 years and have had no involvement with the implementation of the conservation and adaptive reuse project. They are thus in a position to review the environmental aspects of the project with an independent view.

At the time of this audit, virtually all conservation and adaptive works specified in the CoA have been completed, and the hotel and related activities are in full operation.

The five year period also marks the point at which a planned review of the Environmental Management Plan (EMP) developed for the project by NPWS in 2005 and associated Site Wide Management Plans are to be reviewed.

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### Condition of the Site

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The conservation and adaptive reuse project has been conspicuously successful in achieving its environmental and cultural objectives:

- The natural landscape of the site has been restored and managed consistently with the management of surrounding areas of the Sydney Harbour National Park;
- The historic buildings have been stabilised and restored;
- Sensitive adaptations have been made to the historic buildings to allow the operation of a successful modern hotel and heritage tourism operation which focuses on providing guests with an experience based on the history and environmental values of the site; and
- Conservation and interpretive work has been undertaken for the preservation and display of the moveable heritage of the site.

These achievements have helped preserve the Quarantine Station, its cultural and natural environment, increased ease of access and generated community awareness, demonstrating the relevance of the history of the site to current generations of guests, visitors and volunteers.

The Quarantine Station site has become a place which both Sydneysiders and tourists aspire to visit.

Land management activities at the site have provided for the preservation and restoration of large areas of the Eastern Suburbs Banksia Scrub endemic to the site while providing for cleared areas and cultural plantings consistent with the site's historic use. The habitat for local species, particularly the long-nosed bandicoot and little penguin which were considered to be of particular significance on the site, has been preserved and enhanced.

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The operation of the site, particularly following the completion of construction activities, has had a minimal impact on the Manly community. The site is designed to accommodate limited numbers of visitors and parking is provided at the site entrance. Efforts are made to encourage the use of public transport and walking and cycle access to the site. For overnight visitors, the Quarantine Station is normally seen as a “destination resort” where guests remain on site for the duration of their stay, exploring the site and undertaking historical tours. This also limits the traffic impact of the site.

It is recognised that the achievements of the project are dependent on the investment made by Mawland in the site, and its capacity to continue to operate the site as a sustainable business.

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### **Environmental Management System**

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The principal finding of this audit is that the Environmental Management System established through the 2005 EMP, while operating very effectively through the construction phase of the project, requires significant revision to meet the needs of a continuing operation.

The 2005 EMP is a prescriptive document, based closely on the requirements of the CoA. It provides measures for addressing the environmental aspects of the project as recognised at the time of its commencement. This was appropriate during the construction phase and while hotel operations on the site were being established. The EMP has also provided the framework for a very effective working relationship which has developed between OEH and MQS in terms of site management.

Now that the site has moved into its operational phase, there is a need to move from a static, compliance-based system to a more flexible approach which identifies environmental issues as they emerge and implements a risk-based approach to management. This more dynamic approach would allow the development of a rolling program of environmental improvement to continue through the life of the project. It is consistent with the standards-based approach to environmental management systems set out in AS/NZS ISO 14001.

The main features of this approach are:

- An EMS planning process based on the MQS Sustainability Policy which provides for identification of significant environmental aspects of the site's operations, having regard to and legal and regulatory requirements, and assesses and manages the environmental risks;
- Development of an annual Environmental Improvement Plan which sets out a specific program of work to maintain and enhance the environmental values of the site;
- Improved coordination of the operating procedures of OEH, MQS and the hotel operator to assist in the smooth implementation of the work program;
- Continued use of IMAMS as a management information system to monitor site operations and identify issues requiring action;
- A more structured program of internal audits and inspections; and
- More frequent and comprehensive management reviews of the EMS and its implementation.

Properly implemented, this approach has the capacity to provide a simpler approach to regulation of the site, reducing cost and complexity for both Mawland and OEH, and to responding flexibly to emerging issues. It would provide for a management system much more consistent with those used by other organisations whose operations have significant environmental impacts.

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This approach to revising the EMP would be assisted by a review of the CoA. It is important that the CoA continue to set out in clear terms the principles on which the site is to be managed and the obligations of the operator. However, the CoA now contains a significant number of provisions which relate to capital works and other site activities which have been completed and are no longer applicable. There are also a number of detailed requirements which could be effectively, and more flexibly, addressed through Site Wide Management Plans.

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**Other Issues Identified in the Audit**

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The audit also makes recommendations in relation to a number of more detailed management issues including:

- A focus on the Sustainability Policy as the basis for environmental management on site;
- Staff training;
- Resolution of requirements for habitat regeneration works to offset habitat loss;
- Further measures to reduce car traffic to the site;
- Energy management; and
- Revisions to operating procedures to improve work flows and incident management.

Detailed recommendations are set out in Table 1 below.

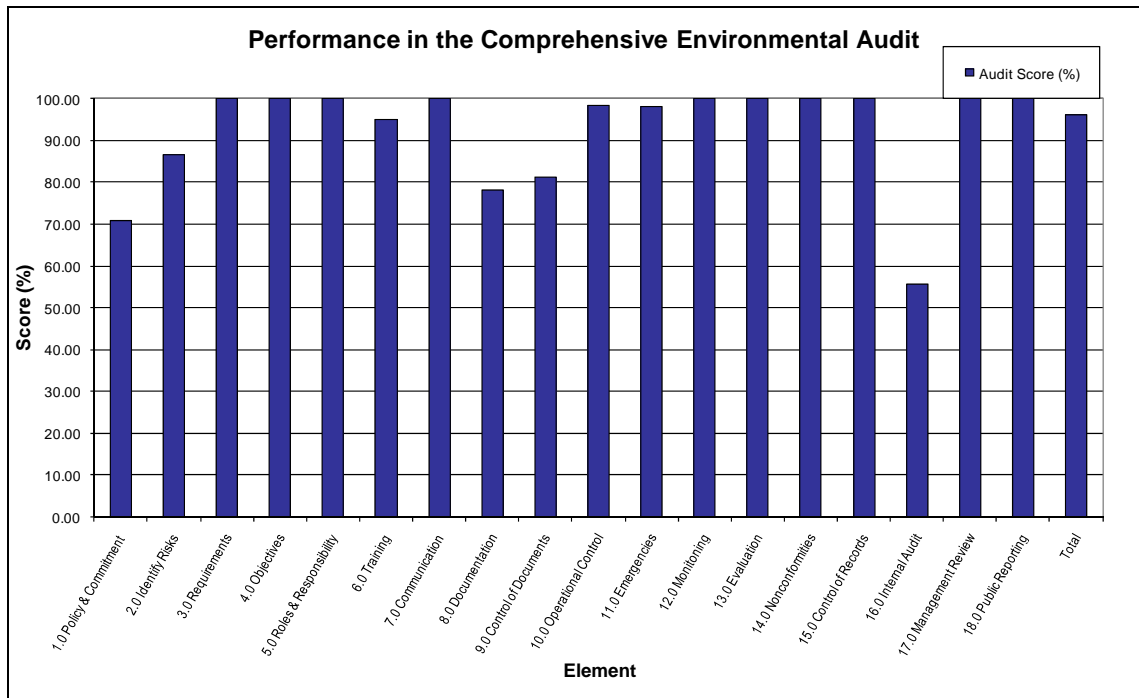
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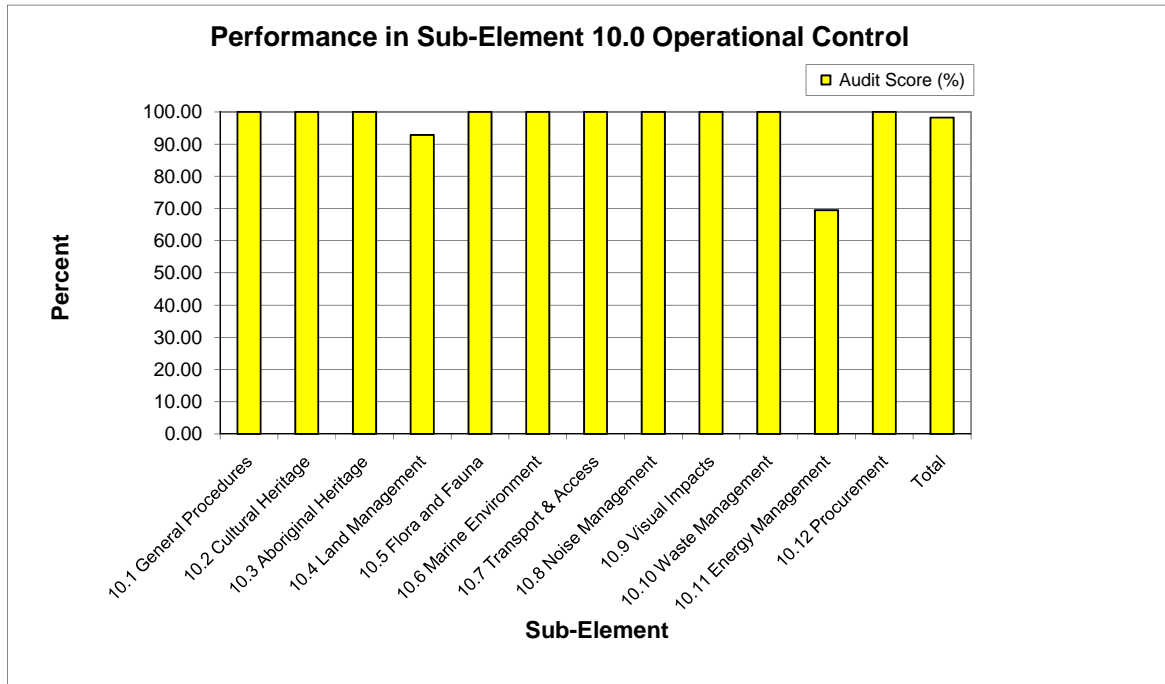
**Audit Scores and Ratings**

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The audit protocol includes a scoring system which provides a general guide to performance of the site in terms of environmental compliance, management and performance. The overall score for the audit was 96%, which higher than the score of 92% achieved in the 2007 Audit by GHD. In comparing the scores, however, it should be noted that progress on the project, and particularly the move from the construction to the operational phase, have meant that different issues are now relevant in a number of areas. Both scores reflect the very high standard of environmental management that has been maintained throughout the project.

The following graphs show scores by element. The elements with lower scores are those which have generally given rise to audit recommendations.





**Table 1: Summary of Audit Recommendations**

Question	Related Questions	Ranking	Recommendation
1.2	1.8, 10.12.6	I	It is recommended that a regular schedule be specified for review of the Sustainability Policy (e.g. 2 yearly). A new, signed version should be issued after each update date, whether or not any changes have been made. NB: A review need not involve re-writing but should be an appraisal of the continuing effectiveness of the Policy.
1.5	6.1	I	It is recommended that relevant portions of the Sustainability Policy be provided to staff during the staff induction program and that its significance as the basis of environmental management at the site be discussed at induction.
1.6		I	It is recommended that the Sustainability Policy or a suitable summary of the policy be displayed in a more prominent location at the site for the information of employees, contractors, visitors.
1.7		I	It is recommended that relevant portions of the Sustainability Policy be provided to suppliers and contractors working on site during the induction program and that its significance as the basis of environmental management at the site be discussed.
1.8		I	It is recommended that the Sustainability Policy continue to be periodically discussed and reviewed by the HSE Committee and other management fora as provided for in Section 1.4 of the Policy and that the discussion be noted in the minutes of these meetings. These discussions should include the formal reviews of the Policy referred to in Recommendation 1.2.
1.9		I	The 2007 Audit made the following recommendation: "Section 1.3 'External Communications' of the Sustainability Policy refers to the 'Environmental' Policy. For consistency, MQS should change the reference from the 'Environmental Policy' to 'Sustainability Policy'". It is recommended that this change be made when the Policy is next reviewed.
2.2	2.5, 10.1.1	I	It is recommended that future arrangements for environmental management at the site include the development and implementation of a more structured process for the periodic identification and assessment of new environmental risks and changes in existing risks, consistent with the planning process set out in the ISO 14001 standard.



Question	Related Questions	Ranking	Recommendation
2.6		I	It is recommended that OEH undertake or commission a formal review of the community consultation processes used for the project and their effectiveness. This review should assess the continued effectiveness of community consultation mechanisms including whether their continued operation is required.
3.1.1	3.2.1, 13.1	I	It is recommended that an up to date register of legal requirements be maintained.
3.1.2		I	It is recommended that a formal register of all plans and approvals for the site, and their current status, be maintained.
4.3	4.4, 4.5, 4.6, 4.8	I	<p>It is recommended that the draft revised EMP currently in preparation be reviewed to take into consideration the findings of this audit.</p> <p>It is recommended that the revised EMP should move to a more flexible risk management approach for identifying environmental impacts, objectives and targets, and should include an Environmental Improvement Program for continual improvement in the management of the site. This approach should be broadly consistent with the ISO 14001 standard and should recognise the need to reduce the cost, time and complexity of the environmental management process for the site.</p> <p>It is recommended that the revised EMP be reviewed annually to appraise its continuing effectiveness and make modifications if required.</p> <p>It is recommended that if an annual Environmental Improvement Program is implemented, the co-proponents each consider formally assigning responsibility for each improvement action applicable to them to a specified person within their organisation.</p> <p>It is recommended that consideration be given to amending the Conditions of Approval to be consistent with the proposed approach to revision of the EMP.</p>
5.5		I	It is recommended that environmental issues be included as a standard item on the agenda for HSE committee meetings so it is not accidentally overlooked during discussion.
6.8		I	It is recommended that a requirement for periodic evaluation and review, but not necessarily re-writing, of the environmental training program be included in the revised EMP (as described in Recommendation 4.3), and that the review procedure should include taking account of training issues identified through HSE and Lease Control Meetings.

Question	Related Questions	Ranking	Recommendation
8.4		I	It is recommended that the revised EMP include an inventory of operating procedures relating to the environmental aspects of the operation, and address arrangements for monitoring and periodic review of their effectiveness.
8.5		I	It is recommended that in the context of development of the revised EMP, a documented review of safety and operational procedures for hotel operations be undertaken to identify changes, if any, that may be required to ensure compliance with environmental requirements at the site, and that similar analysis be undertaken when procedures are revised.
8.6		I	It is recommended that the revised EMP provide for review of operational environmental management documentation on an annual or 2 yearly basis.
10.2.18		I	It is recommended that the CoA and EMP be revised to provide for the replacement of the Conservation Works Program with a Conservation Management Plan or Cyclical Maintenance Plan which addresses the capital works and maintenance activities required to preserve the heritage values of the site. This Plan, once developed should be reviewed and revised on a 2 yearly basis.
10.4.12		I	It is recommended that OEH either identify an appropriate area of North Head for MQS to undertake habitat regeneration works to offset habitat loss from the construction of the CP5 car park or remove the requirement from the CoA.
10.5.6		I	It is recommended that references in IMAMS to bandicoot monitoring methods be updated to reflect current practice.
10.7..20		I	It is recommended that MQS and OEH continue to explore options to increase the proportion of visitors accessing the site by water.
10.7.22		I	It is recommended that continued efforts to be made to facilitate and promote the use of public transport to the site through visitor information, and to develop additional water transport options where feasible.
10.7.25		I	It is recommended that the shuttle bus service to Manly continue to be promoted to assist in reducing car traffic to the site.
10.11.2		I	It is recommended that MQS consider undertaking an energy audit or baseline energy survey to identify current energy inputs and outputs as a basis for continual improvement.
10.11.3		I	It is recommended that transport fuel use be included in energy monitoring reports.

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Question	Related Questions	Ranking	Recommendation
10.11.6		I	It is recommended that energy improvement actions be included in future Environmental Improvement Plans developed for the site.
10.12.1	10.12.3, 10.12.4	I	It is recommended that the MQS Sustainability Policy be amended to include a requirement for consideration of environmental requirements in purchasing.
11.2.2	11.2.3, 11.2.4, 11.2.5	I	It is recommended that a risk assessment be undertaken for possible spills of pollutants including fuel spills from vehicles or spills of waste during collection processes, and that recommended control measures be included in operational and emergency procedures.
11.3.1		I	It is recommended that all incident reporting forms include a prompt for management to assess whether an investigation of the incident is necessary.
13.1		I	It is recommended that the revised EMP should include a procedure for evaluating compliance with all legal and other requirements, including those not contained in the Lease and Conditions of Approval.
14.4		I	It is recommended that the revised EMP include mechanisms by which management plans and procedures can be modified on a more timely basis to reflect the results of actions taken to address non-conformities.
16.1	16.2, 16.3	I	It is recommended that as part of the revised EMP, a program of internal audits and an internal audit schedule be developed consistent with the requirements of ISO 14001.
17.2		I	It is recommended that the revised EMP provide scope for more frequent management reviews and updates of environmental procedures and documentation to deal with changing circumstances.

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**Review of Audit Protocol**

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The Auditor is required to review the continuing relevance of the protocol used for this Audit. This review is undertaken by means of the table in Attachment 2, which identifies those audit questions which are no longer relevant because the requirement reviewed has been completed, or because the issue is not relevant during the operational phase of the project.

The review indicates that there are 46 Questions which are no longer relevant because the requirement reviewed has been completed, and 10 other questions which are no longer required.

Any amendments made to the CoA, and any significant amendments made to the EMP and Site Wide Management Plans, may result in a need for a further review of and amendments to the Audit Protocol.

A table showing the relationship between the CoA and the Audit Protocol is provided as Attachment 3.

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## STRUCTURE OF THE AUDIT REPORT

The Findings, Audit Evidence and Recommendations Section of this Report addresses each question in the Audit Protocol.

Each response includes the following sections:

### 1. *Checkboxes for possible responses*

Three types of answers are used in this Protocol:

- The answer is either yes or no – the Score must be the total rating for the question (the answer is substantially “yes”) or zero (the answer is substantially “no”). A full Score can be achieved even if recommendations for improvement are made.
- The answer is a percentage achievement of, or conformance with, the criteria being assessed – the Score is a percentage of the rating based on the percentage achievement or conformance. The criteria are included in the question or in the guidance information.
- The answer requires the auditor’s professional judgement – the Score is decided by the auditor based on the audit findings and the opinion expressed by the auditor.

The auditor may also assess that a question is Not Applicable. Questions may be Not Applicable if they relate to a phase of the project that has either been completed or not commenced. For example, there are a number of questions in the Protocol that relate to the construction phase of the project, and will be Not Applicable once construction activity has been completed. Questions may also be Not Applicable if they relate to specific events, decisions or directions by regulatory authorities that have not occurred in the audit period. A question may also be Not Applicable if it is a follow-up to a question that has resulted in a negative answer or is itself not applicable.

### *Audit Rating Category, Rating and Score*

This section identifies the category of question and rating in accordance with the Audit Rating System discussed below.

### *Application*

This section identifies the phase of the project to which the question applies:

- The Construction Phase (the period up to the first audit when most construction activity will take place)
- The Operational Phase (the remainder of the life of the project)
- Both phases

### *Responsibility*

This section indicates the assignment of responsibility for the subject matter of the question between the co-proponents, as indicated by the co-proponents themselves. Responsibility may be assigned to OEH, or MQS. Some questions are identified as being the joint responsibility of both co-proponents, while in some cases each of the co-proponents has responsibility in relation to activities they undertake.

### *Management Assertion*

This section records the co-proponents’ response to the question provided to the auditors. In some instances management assertions provided by the co-proponents have been paraphrased or summarised by the auditors to focus directly on the audit findings. In these cases all information provided by the co-proponents has been considered in arriving at the auditors’ findings and recommendations.

### *Objective Evidence*

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This section records the evidence which informs the auditor's conclusion.

*Notes*

This section sets out the auditor's findings.

*Recommendations - Ranking*

This section records the auditor's recommendations and ranking in accordance with the Environmental Recommendations Ranking (ERR) System set out below.

***Audit Rating System***

The rating system used in this Environmental Audit Protocol is based on the categories set out in Table 1 below. Each question is assigned a possible Score (or rating) based on the category assigned to it, and a Score: is given by the auditor based on the extent to which the requirements of the question have been successfully completed. A Score is then calculated for each Element of the Audit Protocol as a percentage achievement against the possible Score for that Element (calculated as the total of all of the possible Scores for all questions in the Element, which is equivalent to the total of the ratings assigned to each question).

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**Table 2 Question Rating Categories**

Category	Rating
<b>ESSENTIAL</b> – the project will not achieve its required environmental outcomes without the item being implemented.	<b>20</b>
<b>REGULATORY REQUIREMENT</b> – equivalent to “Essential”, otherwise the project will be non-compliant.	<b>20</b>
<b>CORPORATE REQUIREMENT</b> – a mandatory requirement by the organisation (eg non-regulatory requirements of an Environmental Management Plan, lease clauses or corporate policies of the co-proponents).	<b>15</b>
<b>NECESSARY</b> – to support Essential; without it the environmental management system will not operate effectively.	<b>15</b>
<b>ISO14001 REQUIREMENT</b> – required to be in place by ISO14001, if applicable, or by an equivalent system.	<b>10</b>
<b>RECOMMENDED</b> (by the auditor, based on good/best practice or experience). The environmental management system will still operate, perhaps ineffectively, if not in place.	<b>10</b>
<b>DESIRABLE</b> – something that would normally be done by an organisation seeking to improve environmental performance, but which will not compromise the effectiveness of the management system if not implemented. A good idea.	<b>5</b>
<b>PROFESSIONAL JUDGEMENT</b> – a question seeking the auditor’s professional judgement to provide the Score. These questions may list a number of items to be addressed, and the auditor will decide how to divide up the value of the rating to provide the Score, depending on the circumstances at the time. One or more items may be given a greater weighting than others, that is, they are considered by the auditor as being more important in the situation being assessed.	Questions involving multiple items may have a rating determined on the basis of the significance of the issues involved.
<b>NOT APPLICABLE</b> - a question may be assessed to be Not Applicable where it does not relate to the current phase of the project. If a question has been assessed to be Not Applicable, the possible Score (equivalent to the rating) is removed from the total possible Score for that element.	<b>NA</b>

### **Environmental Recommendations Ranking (ERR) System**

This Environmental Audit Protocol includes provision for recommendations to be ranked in accordance with the Environmental Recommendations Ranking (ERR) System set out below. The ERR is designed to highlight those recommendations that are considered by the auditor to be the most important (Emergency or Urgent) and which must be addressed within an agreed time frame, and to distinguish them from those that can be managed through normal operational practices that do not require an agreed target time for completion (Improvement or Normal).

An ERR reflects the importance the auditor places on a Recommendation, having regard to the potential impact of the environmental risk to the facility or the environment. The auditor also considers compliance with regulatory and other requirements, the expressed views of interested parties, and risk to the reputation of the organisation being audited. The following terms are used, with an explanation of the actions that the auditor proposes should be carried out.

**TABLE 2. ENVIRONMENTAL RECOMMENDATIONS RANKINGS**

ERR	Proposed Action
<b>“E” (Emergency)</b>	<p>The defect is severe and poses <b>immediate</b> risk to the plant or the environment, to the social fabric of the surrounding community, to regulatory compliance or to the reputation of the organisation. This may include organisational (including management) defects that will lead to rapid deterioration of the plant or operations or the inability to securely and safely deal with an incident (i.e. lack of competent staff, failure of a management process, no emergency plan, inadequate equipment to deal with an emergency etc).</p> <p><b>Action: Management should immediately notify the regulatory authorities. Management should ensure that action is committed to minimise or eliminate the identified risk within a time frame agreed with the auditor, or as required by the regulatory authorities..</b></p>
<b>“U” (Urgent)</b>	<p>The defect presents a serious situation, but may not necessarily impact immediately on human health or safety, assets, the environment, property or the community. There may be a risk which is not immediate, of regulatory non-compliance or adverse publicity affecting the organisation’s public image or business reputation.</p> <p><b>Action: A firm deadline should be set by management to correct the deficiency.</b></p>
<b>“I” (Improvement)</b>	<p>Improvement is required, and can be achieved through regular channels of management, maintenance, capital improvements, or assigned to the environmental or community relations staff.</p> <p><b>Action: Documented action plans to achieve the recommended outcome should be established, e.g. through setting and reviewing Objectives and Targets. Management may decide not to undertake the recommended improvement, and should document the reasons for not doing so.</b></p>
<b>“N” (Normal)</b>	<p>No specific action is considered necessary, the recommendation is considered to be covered by the organisation’s normal environmental or community relations management procedures, however it should be documented through Objectives and Targets or other process.</p>
<b>“NA”</b>	<p>Not Applicable to this situation; there is no perceived risk to the environment or the community, no recommendation is made.</p>



## CERTIFICATE OF ENVIRONMENTAL AUDIT

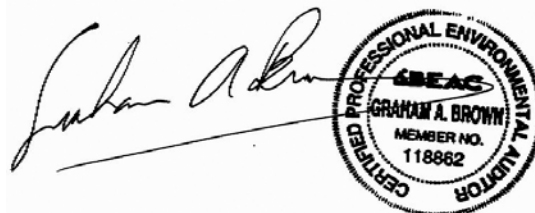
### This is to certify:

1. Graham A Brown & Associates (the Auditor) has prepared the accompanying Environmental Audit Report as at 14 February 2012 (the Report) from certain information provided to it by the NSW Office of Environment and Heritage and MQS Hotel Management Pty Ltd as co-proponents of the North Head Quarantine Station Conservation and Adaptive Reuse Project (the Auditee) at the request of and exclusively for the use and benefit of the Office of Environment and Heritage (the Client).
2. Under the terms of the Auditor's engagement, the Auditor has examined the various environmental practices at the North Head Quarantine Station. The Auditor has relied on information provided by the Auditee. The Auditor expresses no opinion as to the accuracy, truth, sufficiency or legality of the information provided by the Auditee in respect of the Auditee's environmental standards.
3. This Report has been prepared in accordance with generally accepted practices (including the standards set out in *ISO 19011:2011 Guidelines for Auditing Management Systems*) using standards of care and diligence normally practised by recognised consulting firms performing services of a similar nature.
4. The Lead Auditor, Graham Brown, whose qualifications and experience satisfy the criteria set out in *AS/NZS ISO19011*, is a Registered Lead Environmental Auditor (Australia); a Principal Environmental Auditor (UK); and a Certified Professional Environmental Auditor (CPEA – USA).
5. The Auditor is not responsible for the accuracy of information provided by other individuals or entities which is used in this Report. This Report presents our professional judgement based upon data and findings identified in this Report and interpretation of such data based upon our experience and background, and no warranty, either express or implied, is made. The conclusions presented are based upon the current regulatory climate and may require revision if future regulatory changes occur.
6. This Report is issued with the understanding that it is the responsibility of the Client to ensure that the information contained herein is brought to the attention of the appropriate regulatory agencies where required by law.
7. Neither the Auditor nor any member, associate or employee of the Auditor undertakes any responsibility for any injury, loss or damage claimed by the Client or the Auditee arising out of a claim by any third party against the Client or the Auditee in connection with this Report.

### This Report is authorised by:

**Graham A Brown M.Sc. FAusIMM, FEIANZ, CPEA**

NAME



SIGNATURE

12<sup>th</sup> June 2012

DATE

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## FINDINGS, AUDIT EVIDENCE AND RECOMMENDATIONS

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### ELEMENT 1 ENVIRONMENTAL POLICY

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#### Question 1.1

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*Is there a documented Environmental Policy?*

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

#### **Management Assertion**

**OEH:** OEH Quarantine Station Environment Manager reviewed a copy of MQS's draft Environment Policy in June 2007. Following her comments MQS revised the policy and recommended that it be renamed 'Sustainability Policy', which better suited the project objectives. The policy is now officially known as the Sustainability Policy.

**MQS:** Concur with the above. A written Sustainability Policy has been developed by MQS for the North Head Quarantine Station. The Sustainability Policy traverses the following issues; environmental, cultural, heritage, interpretation as well as the sustainable use of resources.

The Sustainability Policy is in accordance with OEH policies for Sydney Harbour National Park as well as the *National Parks and Wildlife Act 1974* (NSW) Section 30E.

The Sustainability Policy was reviewed during the 2007 Audit process and was found to meet the requirements of ISO 14001.

A copy of the MQS Sustainability Policy is kept at the Quarantine Station site office and is also available on the Q Station website.

The statement of MQS Director Maxwell Player attests to the implementation of the Sustainability Policy in accordance with ISO 14001 and the *National Parks and Wildlife Act 1974* (NSW).

Furthermore, MQS note the following in relation to the Sustainability Policy:

- Is appropriate to the environmental impacts of the organisation's activities, products and services (Sections 1.1 and 2.1).
  - Commitment to continual improvement (Section 2).
  - Commitment to the prevention of pollution (Section 3 for pollution strategies, e.g. noise, light, stormwater conservation strategies).
  - Commitment to comply with applicable legal requirements and with other requirements which relate to its environmental aspects (Section 2.2).
  - Provides the framework setting and reviewing environmental objectives and targets (Section 2.1 and 2.3 for framework and Section 2.4 for reviewing process).
  - Is documented, implemented and maintained – see answer to Question 1.3 and
-

Section 4.1 of the Policy.

- Is communicated to all persons working on behalf of the organisation (Sections 1.2 and 4.1), and
- Is made available to the public (Section 1.3 and the answer to Question 1.9).

#### Objective Evidence

- MQS Sustainability Policy 2007
- Director Declaration 2011
- MQS Sustainability Policy 2007 available online:
- <http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>

#### Notes

The MQS Sustainability Policy document addresses the specific requirements of an environmental policy specified in ISO 14001. It also fulfils the requirements of an EMS Manual, setting out the structure of the Sustainability Management System and broad objectives, targets and strategies for their implementation.

#### Recommendations – Ranking: N

There is no recommendation.

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#### Question 1.2

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*Is the Environmental Policy periodically reviewed and updated?*

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 0**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

#### Management Assertion

**OEH:** MQS is responsible for the Environment Policy (Sustainability Policy) –for the conservation and adaptive reuse of the Quarantine Station.

**MQS:** The Sustainability Policy is reviewed regularly through bi-annually IMAMS reports which are presented to the OEH and the QSCC.

In accordance with the periodic reviews through IMAMS, MQS has determined that the Sustainability Policy is in accordance with MQS' operations at the Quarantine Station and that no change to the Sustainability Policy has been required to date.

#### Objective Evidence

- MQS Sustainability Policy 2007
  - IMAMS Policy 2006
  - IMAMS Bi-annual Report January - June 2011
-

## Notes

The MQS Sustainability Policy 2007 (Section 1.4 page 6) states that, "this policy will be regularly reviewed and updated as existing policies need refining and new initiatives are created", and lists the information sources which will provide inputs for such reviews. The first review was scheduled for the fourth quarter of 2008 when the first Environment Report was prepared.

In practice, the Sustainability Policy has not been updated since 14 June 2007.

*Explanatory Note: The process of review of documents and procedures referred to in this report is the process set out in Section 4.6 of the ISO 14001 standard. It involves management regularly assessing the continuing appropriateness and effectiveness of the document concerned and making any necessary changes. It does not imply that documents should be rewritten or extensively modified unless circumstances have changed. Review dates should be noted on the controlled version of each document.*

## Recommendations – Ranking: I

It is recommended that a regular schedule be specified for review of the Sustainability Policy (e.g. 2 yearly). A new, signed version should be issued after each update date, whether or not any changes have been made. NB: A review need not involve re-writing but should be an appraisal of the continuing effectiveness of the Policy.

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### Question 1.3

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***Is the Environmental Policy appropriate to the nature, scale and operations of the organisation?***

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

### Management Assertion

**OEH:** OEH considered the Sustainability Policy to be appropriate to the scale, nature and operations undertaken on the site.

**MQS:** Concur with the above. Furthermore, IMAMS operates in concert with the Sustainability Policy in order to actively monitor the application of the Sustainability Policy to the nature, scale and operations conducted on the site.

### Objective Evidence

- MQS Sustainability Policy 2007

## Notes

The MQS Sustainability Policy is appropriate to the nature, scale and operations of the North

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Head Quarantine Station. This is demonstrated in the Forward (page 4) and section 1.1 (page 5). The policy recognises the cultural, historical, environmental and social significance of the site and the need to establish a philosophy of sustainability.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 1.4**

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***Has the top management of the project appointed a person with appropriate authority to act as the "Environmental Champion" to ensure that the requirements of the Environmental Policy are carried out?***

- Yes  
 No

**Category: Desirable**

**Rating: 5**

**Score: 5**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The Department of Planning (now Department of Planning and Infrastructure) and DEC (now Office of Environment and Heritage) appointed Siân Waythe as Environment Manager for the Quarantine Station project in May 2004. Sian has a Bachelor of Science in Applied Physical Geography (Hons), a Masters in Applied Science (Environmental Management) and 21 years working in environmental management. Sian Waythe is currently on extended leave and in her absence the OEH has employed Louise O'Flynn. Louise holds a Bachelor of Planning (1<sup>st</sup> class Hons) and a Masters in Environmental Management. In addition Louise has close to 10 years experience in environmental management and heritage conservation planning. During an internal restructure of the NPWS in 2010, the Environment Manager Position was renamed 'Environmental Performance Manager'. The Position continues to undertake the responsibilities of the Environment Manager position as per the Quarantine Station Conditions of Approval, however the position's role has been broadened to encompass NPWS 'branch wide' environmental projects.

**MQS:** MQS has appointed Maxwell Player, Director of MQS Quarantine Station, as the 'Environmental Champion' for Quarantine Station. Maxwell Player worked closely with Simon McArthur (the previous 'Environmental Champion' for the Quarantine Station) in developing and implementing the Sustainability Policy and its application to environmental conservation of the site.

**Objective Evidence**

- Maxwell Player CV
  - Letter correspondence re: Appointment of environmental manager
  - Siân Waythe CV
  - Louise O'Flynn letter of appointment
  - Louise O'Flynn CV
-

**Notes**

Persons with appropriate authority and commitment have been appointed by both OEH and MQS to act as environmental champions for the Quarantine Station.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 1.5**

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***Is the Environmental Policy communicated in writing to all employees?***

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 0**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS are each responsible for their own staff and contractors

**Management Assertion**

**OEH:** MQS' Sustainability Policy is outlined to staff as part of the Quarantine Station Site Induction Program. The Sustainability Policy is also displayed in the NPWS North Head Quarantine Station site office.

**MQS:** The Sustainability Policy is communicated to all staff as part of the standard induction program.

All contractors, subcontractors and consultants who work on site are given induction training and education in accordance with Conditions of Approval 64 and 65.

Pursuant to a Hotel Management Agreement dated 1 November 2010 MQS appointed Mirvac Hotels Pty Ltd as Hotel Manager for the site. Mirvac Hotels have enhanced the efficiency of the induction program.

In addition to the above, the Sustainability Policy is displayed on site and is available on the Q Station Website.

MQS takes a 'best practice' approach to the communication of the Sustainability Policy. Not only is same available as described above, but all visitors to the Quarantine Station are made aware of MQS' approach to the environmental management of the site through the following means:

- They are given information from staff and guides.
  - They are given information as part of performances on site.
  - Literature informing visitors of the environmental and heritage aspects of the site is freely available, e.g. left for perusal in guest rooms.
  - There are signs at various locations of the site informing visitors of the environmental and heritage value as well as conservation approaches taken on site.
-

### Objective Evidence

- MQS Sustainability Policy 2007
- Mirvac Associate Handbook
- MQS Sustainability Policy 2007 available online:  
<http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>
- Staff interviews

### Notes

The Sustainability Policy is not communicated to staff as part of the standard induction program.

While the standard induction program discusses the environmental values of the site and requirements for staff to support those environmental values, there is no specific reference to the Sustainability Policy and copies are not provide to staff.

The Sustainability Policy is a relatively detailed document which, as noted in Question 1.1 provides a detailed statement of the structure of the Sustainability Management System. The Sustainability Policy should be referred to in training and a summary document provided.

### Recommendations – Ranking: I

It is recommended that relevant portions of the Sustainability Policy be provided to staff during the staff induction program and that its significance as the basis of environmental management at the site be discussed at induction.

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### Question 1.6

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*Is the current authorised version of the Environmental Policy displayed in locations where it can be reviewed by employees, contractors, visitors or customers?*

- Yes  
 No

**Category:** Recommended

**Rating:** 10

**Score:** 0

**Application:** Construction and Operational Phases

**Responsibility:** Joint

### Management Assertion

**OEH:** OEH displays the MQS Sustainability Policy in the NPWS North Head Quarantine Station site office. At this location the Policy can be reviewed by employees, contractors, visitors or customers.

**MQS:** The Sustainability Policy is prominently displayed at the Q Station site and on the Q Station website.

MQS takes a 'best practice' approach to the communication of the Sustainability Policy. Employees, contractors and visitors to the Quarantine Station are made aware of MQS' approach to the environmental management of the site through the following means:

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- They are given information from staff and guides.
- They are given information as part of performances on site.
- Literature informing visitors of the environmental and heritage aspects of the site is freely available, e.g. left for perusal in guest rooms.
- There are signs at various locations of the site informing visitors of the environmental and heritage value as well as conservation approaches taken on site.

#### Objective Evidence

- MQS Sustainability Policy 2007
- Visitor Information
- Visitor Literature
- MQS Sustainability Policy 2007 available online:  
<http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>

#### Notes

Display of the Environmental (Sustainability) Policy on site is a specific requirement of ISO 14001. The auditors consider that the MQS Sustainability Policy is not prominently displayed at the Q Station site although it is displayed in the OEH office and publicly available on the Q Station website.

While the standard induction program and information provided to visitors discusses the environmental values of the site and the approach to environmental management, the Sustainability Policy is not generally referred to or displayed.

#### Recommendations – Ranking: I

It is recommended that the Sustainability Policy or a suitable summary of the policy be displayed in a more prominent location at the site for the information of employees, contractors, visitors.

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#### Question 1.7

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*Is the Environmental Policy communicated in writing to all suppliers, contractors and customers?*

- Yes  
 No

**Category:** Recommended

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** MQS

#### Management Assertion

**MQS:** The Sustainability Policy is communicated in writing to all suppliers, contractors and consultants through compliance with Conditions of Approval 64 and 65.

#### Objective Evidence

- Mirvac Associate Handbook
-

- Contract Clause under Condition of Approval 65
- MQS Sustainability Policy 2007 available online:  
<http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>

#### Notes

MQS's standard conditions of contract refer to the Sustainability Policy and provide for suppliers and contractors working on site to receive the same induction program as employees.

See Questions 1.5 and 1.6.

#### Recommendations – Ranking: I

It is recommended that relevant portions of the Sustainability Policy be provided to suppliers and contractors working on site during the induction program and that its significance as the basis of environmental management at the site be discussed.

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#### Question 1.8

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*Are the requirements of the Environmental Policy reviewed in group meetings such as Management, Environmental, or Occupational Health and Safety Committees?*

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS are each responsible for their own staff and contractors

#### Management Assertion

**MQS:** The requirements of the Sustainability Policy are regularly reviewed in senior management meetings as well as meetings of the Quarantine Station Health, Safety and Environment Committee.

#### Objective Evidence

- HSE Committee Constitution
- HSE Committee minutes
- Lease Control Meeting Minutes

#### Notes

The site Health, Safety and Environment Committee (comprising MQS and Mirvac staff) and Lease Control Meetings (between MQS and OEH) regularly discuss specific environmental management issues on site, i.e. implementation of the Sustainability Policy. Evidence was not provided that these groups, or other internal management fora, have discussed or reviewed the Sustainability Policy itself.

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### Recommendations – Ranking: I

It is recommended that the Sustainability Policy continue to be periodically discussed and reviewed by the HSE Committee and other management fora as provided for in Section 1.4 of the Policy and that the discussion be noted in the minutes of these meetings. These discussions should include the formal reviews of the Policy referred to in Recommendation 1.2.

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#### Question 1.9

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*Is the Environmental Policy made available to the public?*

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### Management Assertion

**OEH:** As the Sustainability Policy is the responsibility of MQS and it can be viewed on the Mawland Quarantine Station website where the public can download the Policy for their review. Alternatively, the policy can also be viewed at the NPWS/OEH site office.

**MQS:** The Sustainability Policy has been made available to the public via the following means:

- The Sustainability Policy may be viewed at the Q Station site office or on the Q Station website.
- Clause 1.3 of the Sustainability Policy explains that the Policy has been given to the Approval Agencies, the Quarantine Station Community Committee and the Manly Library.
- The IMAMS Policy has been made available for public view on the OEH website.

#### Objective Evidence

- MQS Sustainability Policy 2007 (section 1.3)
- MQS Sustainability Policy 2007 available online:  
<http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>
- IMAMS Policy 2006 available online:  
<http://www.qstation.com.au/pdfs/070803IMAMSFinal.pdf>

#### Notes

The Sustainability Policy and the IMAMS Policy 2006 are available online.

### Recommendations – Ranking: I

The 2007 Audit made the following recommendation: "Section 1.3 'External Communications'

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of the Sustainability Policy refers to the 'Environmental' Policy. For consistency, MQS should change the reference from the 'Environmental Policy' to 'Sustainability Policy'. It is recommended that this change be made when the Policy is next reviewed.

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**Question 1.10**

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***Is the Environmental Policy or its requirements referred to at other times?***

- Yes  
 No

**Category: Desirable**

**Rating: 5**

**Score: 5**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH refers to the Sustainability Policy in its Induction training.

**MQS:** The Sustainability Policy is referred to where necessary to affirm MQS' commitment to its stated goals. For instance, the Sustainability Policy is regularly referred to by the Heritage Architect and in meetings of the QSCC.

**Objective Evidence**

- MQS Sustainability Policy 2007
- IMAMS Policy 2006
- IMAMS Bi-Annual Report January - June 2011
- Annual Sustainability Report 2009
- IMAMS Quarterly Report April – June 2011
- EMP 2005

**Notes**

The MQS Sustainability Policy's objectives and targets are addressed in the IMAMS Policy and other reports including the Annual Sustainability Report.

MQS refers actively to the Sustainability Policy in describing the environmental values and environmental management of the site to hotel guests, visitors and other interested parties.

See Question 1.6.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 1.11**

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***Does the Environmental Policy conform to the following additional requirements of ISO 14001?***

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- Appropriate to the environmental impacts of the organisation's activities, products and services.
- Commitment to continual improvement.
- Commitment to prevention of pollution.
- Commitment to comply with relevant environmental legislation, regulations and other requirements to which the organisation subscribes.
- Provide a framework for setting and reviewing environmental objectives and targets.
- The Policy is implemented.

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**MQS:**

The Sustainability Policy:

- Is appropriate to the environmental impacts of the organisation's activities, products and services (Sections 1.1 and 2.1).
- Commitment to continual improvement (Section 2).
- Commitment to the prevention of pollution (Section 3 for pollution strategies, e.g. noise, light, stormwater conservation strategies).
- Commitment to comply with applicable legal requirements and with other requirements which relate to its environmental aspects (Section 2.2).
- Provides the framework setting and reviewing environmental objectives and targets (Section 2.1 and 2.3 for framework and Section 2.4 for reviewing process).
- Is documented, implemented and maintained – see answer to Question 1.3 and Section 4.1 of the Policy.
- Is communicated to all persons working on behalf of the organisation (Sections 1.2 and 4.1), and
- Is made available to the public (Section 1.3 and the answer to Question 1.9).

**Objective Evidence**

- MQS Sustainability Policy 2007

**Notes**

See Question 1.1

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 2 IDENTIFICATION OF ENVIRONMENTAL RISKS**

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**Question 2.1**

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***Have Environmental Impact Assessments been undertaken as required by applicable legislation for this site or facility?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Since the initial EIS and subsequent Determination and Conditions of Approval, there have been no additions or significant variations to the approved activity either proposed or conducted that have required an EIA to be undertaken. Minor environmental assessments are required as part of lower order planning and assessment procedures, for example as part of the preparation of some of the State Wide Plan (e.g. Infrastructure Control Plan), OEH Construction Assessment and Approval Certificates and Heritage Office Section 60 applications. The OEH Environment Manager and Heritage Advisor use their discretion to confirm that these works do not trigger an EIA procedure. It is MQS' responsibility to assess whether EIA is required for any of their activities. An REF, Section 60 application and Construction Certificate was prepared and approved for the H1 and P22 reconstruction. OEH has developed documented procedure to assist MQS in identifying additional EIA requirements for modifications to the approved activity or new activities on the site.

In 2010 two REF's were prepared for the Quarantine Station:

- REF for the periphery bushland management program and asset protection zones. This REF was prepared by consultants commissioned by OEH
- REF for the demolition of sheds and construction of a pathway. This REF was prepared by consultants on behalf of MQS in 2010.

**MQS:** Concur with OEH management assertion above.

**Objective Evidence**

- REF determination report for the demolition of sheds and walking tracks

**Notes**

Appropriate environmental assessment processes, consistent with legal requirements, have been undertaken for all new works undertaken which were not included in the original EIAs for the project.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 2.2**

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***Using your professional judgement, evaluate the effectiveness of the co-proponents' periodic assessments to identify environmental risks and the potential for: (Professional Judgement)***

- Emissions to the atmosphere
- Discharges to water
- Contamination of land
- Land degradation
- Management of waste
- Damage to cultural heritage values
- Adverse visual impacts
- Other

**Category: Professional Judgement**

**Rating: 35**

**Score: 35**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Environmental risks have already been extensively assessed prior to commencement to have minimal impact. The overall process for the identification and management of environmental risks is as follows: Identified in EIS/PAS and addressed in the EMP and Monitored and adaptively managed through IMAMS.

The approved Site-wide Plans and the Integrated Monitoring and Management System (IMAMS) provide micro-management of environmental risks and are subject to review every five years. All risks are monitored by individual indicators. A review of environmental risks is also to be assessed as part of the Annual Environment Report.

OEH is aware that MQS has established a Health, Safety and Environment Committee but is unaware of the details of the Committee.

Emissions to the atmosphere – This item has no relevance, as MQS is a tourism operation and emissions to the atmosphere are negligible.

Discharges to the water – Stormwater quality and quantity and managing risk associated with discharges is monitored through IMAMS.

Contamination of Land – Some areas within the lease area are already contaminated and environmental risks were investigated by the OEH prior to commencement of the lease in 2003. Land contamination monitoring is ongoing.

Land degradation – This is governed by the Erosion and Sediment Control Plan (within the EMP), The Heritage Landscape Management Plan, and the EMP. These plans make up a micro-management system which governs how much vegetation can be cut down. Management of Waste – this is governed by the Waste Management Plan within the EMP.

The EMP is subject to a periodic review every five years with the first review currently being undertaken by OEH and MQS.

Damage to cultural heritage values – The environmental risks associated with this item are assessed in a separate approval process from the NSW Heritage Office and the OEH.

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Adverse Visual Impacts – This item has been dealt with and approved by the OEH.

**MQS:** All of the items listed above are monitored as appropriate through IMAMS, Senior Management Meetings as well as through the monthly Lease Control meetings.

**Objective Evidence**

- IMAMS Policy 2006
- IMAMS Report January – June 2011
- Director Declaration 2011
- EMP 2005
- Site-wide Plans

**Notes**

The approval process for this project involved very detailed environmental assessment and the establishment of detailed environmental requirements in the Conditions of Approval. Environmental management at the site has so far been principally focused on compliance with approval requirements and management in accordance with approved site-wide management plans. As the site moves from the construction to operational phase, there is a need to develop a process for the identification of environmental risks as they emerge and considering and implementing appropriate controls.

**Recommendations – Ranking: I**

It is recommended that future arrangements for environmental management at the site include the development and implementation of a more structured process for the periodic identification and assessment of new environmental risks and changes in existing risks, consistent with the planning process set out in the ISO 14001 standard.

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**Question 2.3**

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*Do the co-proponents undertake voluntary environmental impact or risk assessments, including cultural heritage assessments, which are documented as part of normal planning for facility development, expansion, operational changes, decommissioning and maintenance?*

- Yes
- No
- Not Applicable

**Category:** Recommended

**Rating:** 10

**Score:** NA

**Application:** Construction and Operational Phases

**Responsibility:** OEH, MQS or Joint

**Management Assertion**

**OEH:** Cultural heritage risks were identified and managed through the following process: Identified in EIS/PAS and addressed in EMP, Section 60 applications and building applications are monitored and adaptively managed through IMAMS and Heritage Advisor inspections.

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A cultural heritage assessment has been undertaken for every building proposed to be adapted. This is part of a standard Heritage Office procedure for a Section 60 approval. Environmental impacts have been assessed for introducing outdoor visitor infrastructure such as lighting. Any changes to the approved activity are addressed through a REF procedure managed by the OEH, such as additional landscape initiatives in the HLMP.

The Archaeological Management Plan requires archaeological assessment whenever a ground disturbance is likely from any works.

**MQS:** Cultural heritage risks are addressed through the following:

- Lease Control meetings.
- QSCC meetings.
- Section 60 Applications and Building Applications.
- Monitored through the IMAMS process and Heritage Advisor inspections. Furthermore, the heritage assessments continue to be undertaken for every building to be adapted. This is part of the standard Heritage Office procedure for a Section 60 approval.

Environmental Impacts are managed through the following:

- Any changes to the approved activities are addressed through the REF procedure managed by the OEH.
- Environmental impacts have been assessed for introducing outdoor visitor infrastructure such as lighting. Any changes to the approved activity are addressed through the REF procedure managed by the OEH, such as additional landscape initiatives in the HLMP.
- The Archaeological Management Plan requires archaeological assessment whenever a ground disturbance is likely from any works. This has been triggered in respect of a path and the new reception works.

**Objective Evidence**

- EMP 2005

**Notes**

Because of the nature of the Quarantine Station site, virtually all works are the subject of formal approvals requiring Reviews of Environmental Factors or are governed by management plans.

**Recommendations – Ranking: NA**

There is no recommendation.

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**Question 2.4**

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***Do the co-proponents have a documented review process to assess the accuracy of the predictions made in environmental impact or risk assessments?***

- Yes  
 No  
 Not Applicable
-

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**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** IMAMS has been approved and addresses environmental and social impacts and risks, and reports and analyses risks. In accordance with IMAMS monitoring of indicators contained in IMAMS takes place quarterly, bi-annually and annually (depending on the indicator requirement). The Annual Environment Report uses the results of IMAMS to evaluate how well the project is performing against potential environmental impacts identified in the EIS or subsequent REFs.

**MQS:** IMAMS has been approved and implemented. It addresses reports and analyses environmental and social impacts and risks. IMAMS contains various indicators and according to the requirement of the relevant indicator, IMAMS monitoring and reporting takes place bi-annually. The Annual Environmental Report uses the results of IMAMS to compare performance against risks and impacts identified in the EIS or subsequent REFs.

**Objective Evidence**

- IMAMS Policy 2006
- IMAMS Bi-Annual Report January - June 2011
- Annual Sustainability Report 2009
- IMAMS Quarterly Report April – June 2011

**Notes**

IMAMS provides a comprehensive set of performance indicators which enable environmental and social impacts and risks to be assessed against the predictions made in planning documents. Such assessments are reported in Annual Environment Reports.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 2.5**

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***Do the co-proponents maintain a procedure for identifying the environmental aspects and impacts of the Activities, Products and Services over which they have control or can be expected to have an influence?***

- Normal, abnormal and emergency emissions to air
  - Normal, abnormal and emergency releases to water
  - Waste Management
  - Land Contamination
  - Land Degradation
  - Impact of plant and animal pests
  - Fire risks
  - Cultural and Heritage impacts
  - Use of raw materials, fuels, energy and natural resources
  - Other local environmental and community issues, eg noise, odour, dust, vibration and visual impact
-

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- Normal and abnormal operating conditions  
 Potential emergency situations and reasonably foreseeable accidents  
 Not Applicable (check this box only if no other box is checked)

**Category:** ISO 14001 Requirement

**Rating:** 10

**Score:** NA

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS are separately responsible for activities they control.

**Management Assertion**

**OEH:** OEH requires environmental impact assessments (REFs) for new works using a standard template. This process describes existing conditions, potential impacts and proposed safeguards to minimise these risks. REFs cover issues such as historic heritage, Aboriginal heritage, flora, fauna, soil erosion and sedimentation, water quality, noise, air quality and visitor and neighbour impacts.

When an EIS is not required under the EP&A Act but OEH wants to identify and manage environmental risks the OEH uses a Conservation Risk Assessment procedure which works like a due diligence REF.

Fire risk on national park estate is covered by two procedures. Bushfire risk is evaluated and responded to through bushfire management plans. There is a bushfire management strategy for North Head. Structural fire risk is mitigated by engaging fire consultants to undertake scheduled inspections of the fire alarm system, fire hydrants and fire extinguishers. (The management of structural fire risk is with MQS).

The risks associated with use of fuels and other chemicals are assessed and mitigated through the OEG Job Safety Analysis (JSA) procedure. Material Safety Data Sheets are held for chemicals used. However, OEH does not store chemicals on site, other than internal-use cleaning products.

Risks to staff, contractors, the public and non-target species (including pets) during routine pest species control programs are assessed and managed through the following documents:

- Predation by the red fox (*Vulpes vulpes*) NSW Threat Abatement Plan.
- Fox Baiting Emergency Action Plan
- JSA Fox baiting using 1080
- Feral Rabbit Management Plan, Sydney Harbour National Park
- JSA Rabbit warren fumigation
- JSA Ground shooting operations
- JSA Rabbit monitoring and control.

The Quarantine Station Environmental Management Plan (Chapter 6) covers what procedures should be followed if an environmental incident occurs.

OEH policy prevents the use of rainforest-sourced timbers.

**MQS:** Concur with OEH above.

In addition, MQS reviews the environmental aspects and impacts of its activities, products and services via the following means:

- Reviews are undertaken as a routine part of Senior Management meetings.
  - Reviews are undertaken as a routine part of Lease Control meetings.
  - Other North Head Stakeholders are consulted where necessary from time to time.
-

### Objective Evidence

- EMP 2005 (Chapter 6)
- North Head Bushfire Management Strategy
- North Head Bushfire Management Strategy Approval
- REF summary guidelines
- Proponents Guidelines for the Review of Environmental Factors
- Predator and Pest Animal Plan

### Notes

Environmental management of the site has been based on the EMP 2005. The EMP, which was prepared before the commencement of activities at the site, did not document any systematic process for identifying and assessing all environmental aspects and impacts of the site's operations. It instead set out a series of environmental objectives and strategies based on compliance with the CoA. Similarly, Site Wide Management Plans for particular environmental or cultural issues have also been primarily based on compliance requirements.

As the site moves from the construction to operational phase, there is a need to develop a process for the identification of environmental risks as they emerge and considering and implementing appropriate controls.

### Recommendations – Ranking: NA

See Recommendation 2.2.

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### Question 2.6

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***Do the co-proponents evaluate the effectiveness with which relevant communities (including indigenous communities) are involved in decisions or actions affecting their environmental and cultural heritage interests?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 0**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

### Management Assertion

**OEH:** OEH have consulted and evaluated partnerships with community groups.

1. Quarantine Station Community Committee (QSCC): The QSCC were established in November 2004. Members were selected via a publicly advertised expression of interest and accessed against criteria outlined in Condition of Approval 57. An independent chair was also appointed and is paid by OEH. The QSCC held its first meeting on 16 December 2004 and since then has held meetings several times every year. In 2005 OEH commissioned a review of the QSCC. A number of recommendations from the review were offered. The main issues being that on a few occasions a quorum could not be reached with member numbers. The recommendation from this was if it is known a quorum is not possible the meeting would be cancelled. However if an unexpected low attendance occurs at a meeting and a quorum is not reached, the meeting will continue but no formal recommendations from the meeting can be made.

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2 Partnership with Aboriginal Groups: OEH Harbour North branch office commissioned the Aboriginal Heritage Office to provide Aboriginal heritage consultation services to the Harbour North Area. This included the preparation of an Aboriginal Heritage Management Plan of North Head including the Quarantine Station. The contract commenced in April 2007.

3. Community Open Days: OEH staff work with MQS to coordinate and attend two Community Open Days each year, generally held in April and September. The open days are an opportunity for staff to interact with the community and answer questions. OEH staff an information desk and run tours at each community open day. The most recent Community Open Day was held over two days in September 2011 (10<sup>th</sup> and 11<sup>th</sup>).

**MQS:** Concur with OEH above.

MQS has consulted with relevant stakeholders in relation to their environmental and cultural heritage interests in the following manner:

- All environmental and cultural heritage matters are monitored through IMAMS.
- MQS has instigated and operated Community Open Days.
- MQS remains an active participant in the QSCC.
- MQS has entered into a cultural heritage alliance with the University of Sydney through the ARC Grant Programme.
- MQS has entered into an operating technology alliance with the University of Technology, Sydney.
- MQS remains open to approach from the Metropolitan Aboriginal Lands Council through its partnership with same and has done so since 2007.
- MQS works with the Tourism and Transport Forum.
- MQS works with the National Parks Volunteer Programme.

**Objective Evidence**

- QSCC Agenda
- QSCC Minutes
- IMAMS Bi-annual Report April – December 2008 Available online:  
<http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf>
- Director Declaration 2011
- Community Involvement & Consultation Available Online:  
[http://www.qstation.com.au/pdfs/conservation/community\\_consultation.pdf](http://www.qstation.com.au/pdfs/conservation/community_consultation.pdf)
- EMP 2005

**Notes**

There is a well established system of community consultation which has been in operation over the life of the project including the QSCC, Community Open Days and aboriginal heritage consultation services managed by OEH. The project has had a high profile in the community and community views have been actively voiced.

There has, however, been no documented process for evaluating the effectiveness of these community consultation methods.

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**Recommendations – Ranking: I**

It is recommended that OEH undertake or commission a formal review of the community consultation processes used for the project and their effectiveness. This review should assess the continued effectiveness of community consultation mechanisms including whether their continued operation is required.

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## ELEMENT 3 LEGAL AND OTHER REQUIREMENTS

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### 3.1 Legal Requirements

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#### Question 3.1.1

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***Are there written procedures to identify and maintain an inventory of, or have access to, environmental legislation?***

- Yes  
 No

**Category: Essential                      Rating: 20                      Score: 20**  
**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### Management Assertion

**OEH:** The EMP documents and interprets the relevance of a wide range of legislation in Section 4. The Induction Program – Module 6 on Environment and Heritage provides a summary of relevant legislation and directs people to visit the EMP for a detailed account. Links to environmental legislation can also be found on the [OEH homepage](#) however OEH staff are advised to visit the [NSW Legislation website](#) to access the most up to date information on legislation.

**MQS:** Concur with the OEH above.

The co-proponents believe that there is a written procedure to identify and maintain an accessible environmental legislative inventory as stated by the OEH above. This process has worked effectively to date. Therefore, the co-proponents do not believe that it is necessary to maintain a separate and superfluous procedure and inventory.

#### Objective Evidence

- Sustainability Policy 2007
- EMP 2005 (Chapter 4)
- Link to the [OEH homepage](#) - legislation section
- Link to [NSW Legislation website](#).

#### Notes

The Sustainability Policy identifies the EMP as the authoritative guide to the relevant legislation influencing the project. Section 4.0 of the EMP provides a comprehensive and detailed legal register (including other, non-statutory requirements). However, legislation and other requirements are subject to change over time, and a process needs to be in place to identify changes of relevance to the site and to ensure that they are communicated to affected staff and addressed in environmental management planning. See also Question 3.2.1.

#### Recommendations – Ranking: I

It is recommended that an up to date register of legal requirements be maintained.

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**Question 3.1.2**

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***Are there written procedures to identify and maintain an inventory of, or have access to, all planning documents, plans, permits, licences, authorisations and approvals relating to the environmental aspects of the project?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The OEH has a record management policy which provides written procedures to maintain an inventory of records. TRIM is the record management database used to record information related to a particular project/matter. TRIM provides all OEH staff with access to, all planning documents, plans, permits, licences, authorisations and approvals relating to the environmental aspects of the project.

**MQS:** The majority of approvals required were documented in the Conditions of Approval and transferred to the Lease and the EMP.

On a day to day basis, the EMP is the principal source of information for identifying relevant plans, permits, licences, authorisations and approvals relating to the environmental aspects of the project. Both MQS and the OEH occasionally use legal advice to interpret the application of some regulations or Conditions of Approval to the Quarantine Station site and activities. This advice is shared in monthly Lease Control meetings and may be documented in minutes or in letters between MQS and the OEH.

**Objective Evidence**

- OEH Records Management Policy 2011
- EMP 2005
- Lease

**Notes**

Records of planning and approval documentation are maintained by both OEH and MQS, and electronic and paper records are readily available on site. To date, most such documentation has been directly related to the CoA. Over time, the number of modifications and additional approvals is increasing, and it will become necessary to develop a formal register to ensure that both parties have a common understanding of the status of all of plans and approvals.

**Recommendations – Ranking: I**

It is recommended that a formal register of all plans and approvals for the site, and their current status, be maintained.

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**Question 3.1.3**

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***Are all required environmental operating approvals, permits, licences and consents current?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** All operating and occupation certificates (both interim and final) as well as other consents and approvals are current as far as MQS is aware.

No notifications have been received from any authority by MQS to suggest otherwise.

**Objective Evidence**

- Occupation certificates
- Wharf Licence
- Letter correspondence re: Quarantine Station Contracts
- Liquor Licence

**Notes**

A range of approval and licencing documentation was reviewed during the audit and found to be current.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 3.1.4**

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***Have the co-proponents complied with the requirement to carry out the activity in accordance with the Environmental Impact Statement (EIS), Preferred Activity Statement (PAS) and Conditions of Planning Approval?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

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**OEH:** There have been some variations to the timing of conservation and adaptation works, as well as the design of some adapted buildings from what had been previously outlined in the Environmental Impact Statement (EIS) and Preferred Activity Statement (PAS). These variations have been approved by OEH and the Heritage Office through the revised Staging Plan or building (CAAC) and S60 applications.

The program of works as outlined in the original Staging Plan did not allow construction work to be carried out in a logical way across the site. Another practical consideration was the deferment of hotel and conference centre operations until the end of Stage 2.

It was always envisaged that through the detailed design process for the adapted buildings that there would be minor variations to cover BCA requirements, minimisation of heritage impact or operational requirements. OEH has developed a Compliance Rectification Procedure to clearly establish a way of dealing with potential non-compliances with the EIS/PAS, lease and conditions of planning approval.

The Environment Manager's six monthly report, details non-compliances.

**MQS:** The activity has been carried out in accordance with the EIS, PAS, Lease and Conditions of Approval and MQS has not received any material evidence to the contrary.

#### Objective Evidence

- OEH Environment Manager's six monthly status report
- OEH Compliance Rectification Database printout
- Lease Control meeting Minutes
- Site inspection

#### Notes

The co-proponents have complied with the requirement to carry out the activity in accordance with the Environmental Impact Statement (EIS), Preferred Activity Statement (PAS) and CoA, subject to minor timing and design variations. Now that the major conservation and adaptation works on the site are complete, it is clear that the objectives of the planning process have been very successfully achieved.

#### Recommendations – Ranking: N

There is no recommendation.

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#### Question 3.1.5

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*Have the co-proponents complied with the requirement to ensure that a separate application is made and approval gained under Part 5 of the EP&A Act 1979 and other applicable legislation for any amplification of the existing water supply and sewerage system?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

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**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**OEH:** To this point in time there has been no requirement to amplify the existing water supply or sewage system, and as such no separate application and approval has been necessary. Information on the water supply and sewerage system on site can be found in the Infrastructure Control Plan for the North Head Quarantine Station prepared by MQS.

**MQS:** Concur with the OEH above and further note that no such works have been required, undertaken or completed as the systems are adequate at this time.

**Objective Evidence**

- Director Declaration 2011

**Notes**

To date there has been no amplification of the existing water supply and sewerage system.

**Recommendations – Ranking: NA**

There is no recommendation.

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### 3.2 Other Requirements

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#### Question 3.2.1

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***Do the written procedures in Question 3.1.1 include other environmental requirements adopted by the co-proponents?***

- Yes  
 No  
 Not Applicable – the organisation has not adopted any other requirements.

**Category: Necessary +ISO 14001 Requirement      Rating: 10      Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### **Management Assertion**

**OEH:** The Environmental Management Plan contains lists of documents that are not limited to legislation. These include non statutory guidelines such as Conservation Management Plans, Detailed Area Conservation Management Plans, Register of the National Estate listing, The Burra Charter, Environmental Impact Statements, expert reports on fauna and Site Wide Plans. A procedure for identifying and maintaining an inventory of other environmental requirements related to the project has been included in Chapter 4 of the EMP.

**MQS:** Yes, the EMP is designed so that additional legislation, policies and initiatives can be grafted onto it. For example, as site wide plans are completed (which include environmental requirements) they are added into the EMP appendices.

#### **Objective Evidence**

- EMP 2005
- EMP Appendices 2005

#### **Notes**

The EMP includes a number of adopted environmental requirements which do not have the status of legislation. However, such requirements are subject to change over time, and a process needs to be in place to identify changes of relevance to the site and to ensure that they are communicated to affected staff and addressed in environmental management planning. See also Question 3.1.1.

#### **Recommendations – Ranking: I**

See also Recommendation 3.1.1.

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**Question 3.2.2**

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***Do the co-proponents comply with all of the conditions or commitments contained in other environmental requirements that they have adopted?***

- Yes  
 No  
 Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The OEH is committed to comply and enforce the Conditions of Approval, the Environmental Management Plan; all approved Site Wide Plans, guidelines within Quarantine Station Conservation Management Plans, Quarantine Station Detailed Area Conservation Management Plans, the Burra Charter, and Environmental Impact Statements. OEH is also committed to comply with guidelines enforced by WorkCover, Australian Standards and Building Codes of Australia

**MQS:** MQS has committed to a sustainable tourism operation that goes beyond the requirement of the activity as identified above.

**Objective Evidence**

- MQS Sustainability Policy 2007 (Foreword and Sections 2 & 3)
- IMAMS Policy 2006
- IMAMS Bi-Annual Report January - June 2011
- Annual Sustainability Report 2009
- IMAMS Quarterly Report April – June 2011

**Notes**

Environmental requirements included in the EMP are monitored and reported through IMAMS.

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 4 ENVIRONMENTAL OBJECTIVES, TARGETS AND PROGRAMS**

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**Question 4.1**

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***Have the co-proponents complied with the requirement that an Environmental Management Plan shall be prepared by the co-proponents?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** A site-wide Environment Management Plan was prepared by Siân Waythe, Quarantine Station Environment Manager in May 2005. The Plan was approved by the Department of Environment and Conservation on 13 July 2005 and the Department of Infrastructure, Planning and Natural Resources on the 10 August 2005. This approval occurred 15 months prior to the commencement of Construction works. Pages i-x demonstrates how the Plan meets the requirements of the Conditions of Approval, applicable legislation, environmental best practice and commitments of environmental management. The EMP is currently under review.

**MQS:** Concur with the above.

**Objective Evidence**

- EMP 2005
- EMP Appendices 2005
- EMP Implementation Database printout

**Notes**

The EMP was approved by Tony Fleming (Deputy Director-General, Parks and Wildlife Division) on behalf of the Department of Environment and Conservation on 13 July 2005 and by Robert Black (Director, Urban Assessment Branch) on behalf of the Department of Infrastructure, Planning and Natural Resources on the 10 August 2005.

Pages ix-x in particular demonstrate how the EMP meets the requirements of the Conditions of Approval, applicable legislation, environmental best practice and commitments of environmental management.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 4.2**

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***Have the co-proponents implemented the approved Environmental Management Plan?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The EMP is being implemented with high levels of compliance within the documented timeframes. This is demonstrated through the 2011 review of the EMP, in particular the database which records the status of EMP strategies.

**MQS:** Concur with the above.

**Objective Evidence**

- EMP Implementation Database printout
- Site inspection

**Notes**

The approved EMP has been implemented since the commencement of the project in 2006, with minimal variations being required to meet changing circumstances. Implementation is tracked using the EMP Implementation Database maintained by OEH.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 4.3**

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***Do the co-proponents comply with the requirement that the EMP shall be reviewed and revised in consultation with the OEH as necessary to incorporate revisions to applicable site-wide strategies, plans and the results of the integrated monitoring program?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

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## Management Assertion

**OEH:** The EMP is currently under review. The review clearly identifies the status of each EMP strategy. A revised draft EMP has been prepared by Sian Waythe and has been reviewed by the QSCC. The draft EMP is still to undergo wider stakeholder consultation. In the new version of the EMP disk copies of the other site wide plans will be included as an appendix.

**MQS:** Concur with the above.

## Objective Evidence

- Draft EMP 2011
- EMP 2005 (Chapter 2)
- EMP Implementation Database printout

## Notes

Chapter 2 of the EMP 2005 states,

The EMP will be reviewed formally on an annual basis, following submission of the annual environmental report (conditions 221-225). The EMP review will be undertaken by the DEC Environment Manager in conjunction with MHM.

Chapter 2 also states that the review and recommendations to the EMP will be submitted to the DEC for approval. When undertaking the review the Environment Manager will consult with DIPNR, NSW Heritage Council, Maritime Authority and the QSCC where appropriate.

In practice, the EMP has not been subject to annual reviews and has effectively continued unchanged since 2006.

While the EMP 2005 proved to be appropriate and effective for the environmental management of the construction phase of the project, it is important that a thorough review be conducted to ensure that it will continue to operate successfully through the operational phase.

During the construction phase of the project, environmental management was focused principally on implementation of the program of building and landscape restoration set out in the Conditions of Approval. Now that the project has move to its operational phase, a rigid plan which is not regularly reviewed and updated to deal with changing circumstances is inadequate. There is a need to move to a modified approach in which environmental impacts are identified, risk management strategies defined, and objectives and targets set for an ongoing program of continual improvement. It is suggested that the EMP should include an annual Environmental Improvement Plan for the achievement of objectives and targets, with responsibility for improvement actions being clearly assigned both between and within organisations.

In this period, it is important that EMP be reviewed regularly on an annual basis as originally intended. *[For discussion of the review process, see Explanatory Note to Question 1.2.]*

## Recommendations – Ranking: I

It is recommended that the draft revised EMP currently in preparation be reviewed to take into consideration the findings of this audit.

It is recommended that the revised EMP should move to a more flexible risk management approach for identifying environmental impacts, objectives and targets, and should include an Environmental Improvement Program for continual improvement in the management of the

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site. This approach should be broadly consistent with the ISO 14001 standard and should recognise the need to reduce the cost, time and complexity of the environmental management process for the site.

It is recommended that the revised EMP be reviewed annually to appraise its continuing effectiveness and make modifications if required.

It is recommended that if an annual Environmental Improvement Program is implemented, the co-proponents each consider formally assigning responsibility for each improvement action applicable to them to a specified person within their organisation.

It is recommended that consideration be given to amending the Conditions of Approval to be consistent with the proposed approach to revision of the EMP.

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**Question 4.4**

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***Does the Environmental Management Plan or other environmental action plans prepared by the co-proponents include the means by which environmental objectives, strategies and targets are to be achieved?***

- Yes  
 No

**Category:** ISO 14001 Requirement

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** Yes. Chapter 10 of the adopted EMP outlines the environmental objectives for the project and the actions and environmental monitoring requirements to achieve the objectives. Responsibility for each action (called an environmental safeguard) is provided. Timeframes are issued for most actions.

**MQS:** Concur with the above.

**Objective Evidence**

- EMP 2005 (Chapter 10)
- MQS Sustainability Policy 2007
- EMP Implementation Database printout

**Notes**

Chapter 10 of the EMP 2005 addresses specific environmental objectives and strategies for the major environmental management elements of the site. Chapter 10 identifies the potential environmental impacts of the proposed activities and specifies the actions required; the responsibility for the action being undertaken and the timeframe to achieve the objectives.

Responsibilities for actions were assigned between the co-proponents, which committed themselves to provide adequate resources for implementation.

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This approach was effective for the construction phase of the project. As noted in Question 4.3, it is considered that a revised approach will be required for the operational phase, involving the establishment of an annual Environmental Improvement Program

**Recommendations – Ranking: I**

See Recommendation 4.3.

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**Question 4.5**

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***Does the Environmental Management Plan or other environmental action plans prepared by the co-proponents include the time-frame by which objectives, strategies and targets are to be achieved?***

- Yes  
 No

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** Yes, as per question 4.4, Chapter 10 of the adopted EMP outlines the environmental objectives for the project and the actions and environmental monitoring requirements to achieve the objectives. Responsibility for each action (called an environmental safeguard) is provided. Timeframes are issued for most actions.

**MQS:** Concur with the above.

**Objective Evidence**

- EMP 2005 (Chapter 10)
- EMP Implementation Database printout

**Notes**

Chapter 10 of the EMP 2005 provides the environmental objectives for the project as well as the strategies, actions and monitoring required to achieve the environmental objectives. Timeframes were provided for most actions, and implementation was tracked using the EMP Implementation Database. In some cases timeframes extended over a number of years as cultural heritage and landscape restoration activities were undertaken.

This approach was effective for the construction phase of the project. As noted in Question 4.3, it is considered that a revised approach will be required for the operational phase, involving the establishment of an annual Environmental Improvement Program.

**Recommendations – Ranking: I**

See Recommendation 4.3.

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**Question 4.6**

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***Have the co-proponents established and implemented documented environmental objectives, strategies and targets that are maintained at relevant functions and levels within the organisation?***

- Yes  
 No  
 Not Applicable

**Category: ISO14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS. Roles and responsibilities are identified in the EMP.

**Management Assertion**

**OEH:** Documented environmental objectives, strategies and targets have been established and implemented in the EMP and subsequent Sustainability Policy. IMAMS reiterates the targets developed in the Sustainability Policy. Both the EMP and Sustainability Policy strategies cut across various organisational functions and levels.

**MQS:** Concur with the above.

**Objective Evidence**

- IMAMS Policy 2006
- EMP 2005
- MQS Sustainability Policy 2007

**Notes**

The EMP 2005 assigned responsibilities for environmental objectives and targets between the co-proponents, and Section 4.1 of the Sustainability Policy sets out a general assignment of environmental responsibilities within MQS. As the cultural heritage and landscape restoration of the site was the core business of MQS (and the NPWS Environmental Manager for the Quarantine Station), it was unnecessary to make detailed formal assignments of responsibility within the organisation.

During the operational phase, MQS in particular is undertaking a greater range of activities, including its hotel operations, and it is important that responsibilities for environmental management and environmental improvement actions should be clearly set out. Responsibility for achievement of each environmental objective and target should be assigned to a specified person or group within the relevant organisation.

**Recommendations – Ranking: I**

See Recommendation 4.3.

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**Question 4.7**

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***Are the objectives and targets measurable, where practicable, and consistent with the Environmental Policy, including commitments to prevention of pollution, to compliance with applicable legal requirements and other requirements to which the co-proponents subscribe?***

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- Yes  
 No  
 Not Applicable

**Category:** ISO14001 Requirement                      **Rating:** 10                      **Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS. Roles and responsibilities are identified in the EMP.

**Management Assertion**

**OEH:** As per response to question 4.6, measurable objectives and targets are located within the Sustainability Policy and IMAMS, as are commitments to prevention of pollution, compliance with applicable legal requirements and other requirements to which MQS Quarantine Station and the OEH subscribe.

**MQS:** Concur with the above.

**Objective Evidence**

- MQS Sustainability Policy 2007
- IMAMS Policy 2006
- EMP 2005
- EMP Implementation Database printout

**Notes**

Objectives and targets set in the EMP 2005 meet these requirements. IMAMS provides a comprehensive system for measuring the achievement of environmental targets.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 4.8**

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***Are processes in place for the designation of responsibility for achieving environmental objectives and targets at relevant functions and levels of the organisation?***

- Yes  
 No

**Category:** ISO 14001 Requirement                      **Rating:** 10                      **Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** The adopted EMP (Chapter 10) assigns responsibility to either OEH or MQS for each task. The division of roles within each organisation is provided in Chapter 5 of the EMP. Appendix 2 of the EMP shows who is responsible for undertaking and approving actions

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arising from the Conditions of Approval.

**MQS:** MQS concurs with the above and further notes the internal designation of responsibility as detailed in Section 4.1 of the Sustainability Policy.

MQS also constantly reminds staff at all levels and functions of their responsibility to engage in environmentally conscious conduct.

#### Objective Evidence

- EMP 2005 (Chapter 5)
- EMP Appendices 2005 (Appendix 2)
- MQS Sustainability Policy 2007

#### Notes

See Question 4.6. Section 4.1 of the Sustainability Policy sets out a general assignment of environmental responsibilities within MQS.

#### Recommendations – Ranking: I

See Recommendation 4.3.

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#### Question 4.9

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***Does the setting and reviewing of environmental objectives and targets consider the following additional requirements of ISO 14001?***

- Legal and other requirements
- Significant environmental aspects
- Technological options
- Financial, operational and business requirements
- The views of interested parties
- Consistency with the Environmental Policy, including the commitment to the prevention of pollution
- Quantification where practicable
- Not Applicable (Check this box only if no other box is checked)

**Category:** ISO 14001 Requirement

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** OEH

#### Management Assertion

##### OEH:

*Legal and other requirements* – Yes, see EMP Chapter 4.

*Significant environmental aspects* – Yes, see EMP Chapter 10.

*Technological options* – Yes, solutions to achieving fire and acoustical separation whilst protecting heritage fabric.

*Financial, operational and business requirements* – Yes see EMP Chapter 10.

*The views of interested parties* – Yes, the EMP was reviewed by the Quarantine Station Community Committee. The new draft EMP has also been reviewed by the QSCC.

*Consistency with the Environmental Policy, including the commitment to the prevention of*

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*pollution* - Yes it is consistent with MQS's Sustainability Policy

*Quantification where practicable* – Yes, IMAMS provides measurable targets for indicators.

**MQS:** Concur with the above.

**Objective Evidence**

- EMP 2005
- IMAMS Policy 2006
- MQS Sustainability Policy 2007

**Notes**

The setting of environmental objectives and targets in the EMP 2005 takes account of these factors.

**Recommendations – Ranking: N**

There are no recommendations.

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**ELEMENT 5 RESOURCES, ROLES, RESPONSIBILITY AND AUTHORITY**

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**Question 5.1**

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***Do the co-proponents comply with the requirement to engage a suitably qualified Environmental Manager for the duration of the approval?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** The Department of Planning (now Department of Planning and Infrastructure) and DEC (now Office of Environment and Heritage) appointed Siân Waythe as Environmental Manager for the Quarantine Station project in May 2004. She has a Bachelor of Science in Applied Physical Geography (Hons), a Masters in Applied Science (Environmental Management) and 21 years working in environmental management. Sian is currently on extended leave for 12 months and the OEH has employed Louise O'Flynn in Sian's absence. Louise holds a Bachelor of Planning and a Masters in Environmental Management. She also has 10 years work experience in environmental management and heritage conservation planning.

The Environmental Manager (this position is now referred to as the Environmental Performance Manager) has appropriate authority to independently carry out her duties as specified in condition 53. The Environmental Manager:

- a) has and continues to conduct the specific actions identified in the conditions of approval;
  - b) oversees the undertaking of the activity in accordance with the conditions of approval;
  - c) produced and oversees the implementation of, the EMP, as well as contributed to the integrated monitoring and adaptive management system as it relates to environmental management;
  - d) Contributed to the environmental management module as part of an induction and training program for all persons involved with the construction works;
  - e) Is currently producing the first six monthly status reports to the OEH which shall include, but not be limited to:
    - progress in implementation of approval conditions as these relate to environmental management (this shall include monitoring programs)
    - complaints and responses to these
    - any breaches of conditions and response
    - compliance or other issues arising;
  - f) has the authority to stop work immediately if, in the view of the Environmental Performance Manager, an unacceptable impact is likely to occur as a result of the undertaking of the activity, or to require other reasonable steps to be taken to avoid or minimise any adverse impacts;
  - g) is available during the construction activities. The Environmental Performance Manager is located on site at the OEH Quarantine Station office during business hours. Or contactable via mobile after hours for critical construction activities as defined in the EMP; and
  - h) OEH has a Compliance Rectification Process that prompts OEH to advise the co-proponents, OEH, DP&I, the Heritage Council and/or the Waterways Authority (depending on the issue involved) of any major issues resulting from the undertaking of the activity that have not been dealt with expediently or adequately by the co-proponents.
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**MQS:** Concur with the above and further note Section 16.8 of the Lease.

**Objective Evidence**

- Environment Manager Position Description
- Lease (Section 16.28)
- Letter correspondence re: Appointment of environmental manager
- Siân Waythe CV
- Louise O'Flynn letter of appointment
- Louise O'Flynn CV

**Notes**

The persons appointed by OEH as Environmental Manager (subsequently Environmental Performance Manager) of the Quarantine Station clearly meet the requirements of the Conditions of Approval.

The position description for the position provides the Manager with the authority to fulfil the requirements listed in condition 53 and section 16.28 of the lease conditions.

**Recommendations – Ranking: N**

There are no recommendations.

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**Question 5.2**

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*Is there an organisation chart or other document that accurately establishes the organisational framework that supports the Environmental Management Plan?*

- Yes  
 No

**Category: Necessary +ISO 14001**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** The OEH organisational framework is presented in the EMP Section 5.

**MQS:** The organisational framework is documented in Section 5 of the EMP and in Section 4.1 of MQS' Sustainability Policy.

**Objective Evidence**

- EMP 2005 (Chapter 5)
- MQS Sustainability Policy 2007 (Section 4.1)

**Notes**

The organisational framework set out in the EMP 2005 and the Sustainability Policy continues to apply to the project.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 5.3**

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***Are environmental responsibilities included in the position descriptions of, and communicated to, all employees, appropriate to their roles and duties within the organisation?***

- Yes  
 No

**Category: Necessary                      Rating: 15                      Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:**                      Joint

**Management Assertion**

**OEH:** Environmental responsibilities are written into the Position Descriptions of OEH Staff. A Quarantine Station induction program is provided to those staff that will be conducting works on the Quarantine Station site. The induction outlines the staff's environmental responsibilities. This induction occurs verbally and a written induction manual is available on site for staff to access.

**MQS:** Environmental responsibilities are written into the Position Descriptions of MQS staff and are then communicated by the induction program, skills training and regular team meetings. The Sustainability Policy also provides direction on this issue.

MQS further asserts that the policy and procedure approved and noted by the Auditor in the 2007 Audit are still in place.

**Objective evidence**

- Environment Manager Position Description
- NPWS Position Description – Ranger
- General position description for all Mirvac employees
- Position description – Mirvac Department Manager
- Position description – Mirvac Supervisor
- Mirvac position description – Demi Chef
- Mirvac HSE Consultation Statement
- Mirvac Associate Handbook

**Notes**

Environmental responsibilities are included in position descriptions for OEH and MQS staff and are communicated through induction programs, other training and team meetings.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 5.4**

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***Are budgets provided for implementation of the Environmental Management Plan at all appropriate levels and functions of the organisation?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH has an operating budget for activities listed in the Environment Management Plan. The Budget is set annually.

**MQS:** It is not useful to create a specific budget for the implementation of the Sustainability Policy due to the Policy's mix of policy and actions for which it is impossible to create individual cost items. The Sustainability Policy identifies where specific allocations have been made. Much of the current development budget is for conservation works and could thus be argued as an environmental management budget. At the operations level, there are separate budgets for environmental training, maintenance and monitoring as well as consultation. Some cost allocations in these areas have been written into site wide plans (e.g. the budget for IMAMS) and some have been written into the Lease (e.g. contribution to OEH environmental monitoring and population viability assessments under Clauses 19A.5 and 19A.6 of the Lease).

Budgets described are not available for review due to commercial sensitivity. However, as the Auditor found in 2007, the actions that have taken place to date indicate that implementation of the Sustainability Policy has been considered in preparing the site's budget.

**Objective evidence:**

- MQS Sustainability Policy 2007 (Section 4.1)
- IMAMS Policy 2006 (Section 5.2)

**Notes**

It is clear from the successful implementation of the EMP 2005 over the past five years that substantial and adequate resources have been committed to the task.

It is important that future revisions of the EMP and annual Environmental Improvement Plans continue to be developed with an appropriate recognition of the resources available for their fulfilment.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 5.5**

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***Is there: (a) a Site Environmental Committee (either dedicated or included in another committee) that meets regularly at this facility, and (b) a written charter establishing the functions and authority of the Committee?***

- (a) - Yes  
 (b) - Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH does not have a specific site Environment Committee for the Quarantine Station. OEH discusses environmental issues on a regular basis at the OEH Property Services team meetings and the OEH/ MQS monthly lease meetings. The Lease and the Conditions of Approval constitute the framework that governs the relationship between the parties; the parties have chosen to administer that framework through their monthly Lease Control Meetings.

**MQS:** There is a Health, Safety and Environmental Management Committee.

The Environmental Champion is entitled to attend all meetings and takes an active interest in the work of the Committee.

The functions of the Committee are documented in the Sustainability Policy as; identification of risks, preparation of risk management response procedures, implementation of the Sustainability Policy and IMAMS co-ordination.

**Objective evidence**

- HSE Committee Constitution
- HSE Committee minutes
- Lease Control Meeting Minutes
- MQS Sustainability Policy 2007 (Section 4.1)

**Notes**

The Quarantine Station Health, Safety, Environment Committee is the mechanism for discussing environmental matters within MQS. The HSE Committee Constitution outlines the committee's objectives; functions; roles and responsibilities.

The HSE Committee Meeting Minutes show that the committee focuses mostly on health, safety and wellbeing issues for visitors and employees, but discusses environmental matters as required. Environmental matters are not listed as a standard item on the meeting agenda.

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Lease control meetings are the principal avenue of communication on environmental matters between OEH and MQS.

### Recommendations – Ranking: I

It is recommended that environmental issues be included as a standard item on the agenda for HSE committee meetings so it is not accidentally overlooked during discussion.

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### Question 5.6

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***Are those management personnel having direct environmental responsibility, technically competent and appropriately qualified to carry out their duties?***

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS

### Management Assertion

**OEH:** The Department of Planning (now Department of Planning and Infrastructure) and DEC (now Office of Environment and Heritage) appointed Siân Waythe as Environmental Manager for the Quarantine Station project in May 2004. She has a Bachelor of Science in Applied Physical Geography (Hons), a Masters in Applied Science (Environmental Management) and 21 years working in environmental management. Sian is currently on extended leave for 12 months and the OEH has employed Louise O'Flynn in Sian's absence. Louise holds a Bachelor of Planning and a Masters in Environmental Management. She also has 10 years work experience in environmental management and heritage conservation planning.

**MQS:** In the exercise of those environmental responsibilities and policies which are the responsibility of MQS:

- Overall environmental responsibility for the site rests with the Environmental Champion, Maxwell Player. Maxwell Player and MQS refer issues from time to time to Simon McArthur (the previous Project Manager and General Manager for the site) on a consultancy basis.
- Assisting Maxwell Player are:
  - The Site Manager, Todd Durrant who oversees all work on site.
  - The Visitor Services Manager, Helen Drew who oversees visitor operations on site.
  - The Curator, Rachel Lawrence who oversees the heritage collection on site.

### Objective evidence

- Maxwell Player CV
  - Siân Waythe CV
  - Louise O'Flynn CV
  - Letter correspondence re: Appointment of environmental manager
  - Louise O'Flynn letter of appointment
  - Todd Durrant CV
  - Position Description – Site Property Manager
  - Todd Durrant Induction Records
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- Helen Drew CV
- Helen Drew Induction Records
- Rachel Lawrence CV
- Rachel Lawrence Induction Records

**Notes**

Review of the relevant personnel's CVs demonstrates that all managers having environmental responsibilities are technically competent and appropriately qualified to carry out their duties.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 5.7**

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***Are the co-proponents' external advisors such as environmental consultants, engineers and legal advisors technically competent and appropriately qualified to carry out their duties in relation to environmental matters?***

Auditor's Professional Judgement

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** OEH being a state government entity has strict contract engagement procedures. This involves potential tenders providing information on their professional qualifications and experiences. OEH has employed professional engineers, builders, and architects etc for this project. An excellent example of where OEH has engaged appropriately qualified and technically competent external advisors in relation to environmental matters is the North Head Quarantine Station Comprehensive Environmental Audit 2011. Other examples of OEH commissioned work on the site that have occurred include noise monitoring, contamination monitoring and rabbit baiting. OEH uses its in-house legal branch to provide initial advice on legal matters.

**MQS:** MQS has submitted and continues to submit for review the profiles of all major consultants on site.

**Objective evidence**

- OEH Procurement Manual
- Director Declaration 2011

**Notes**

Procedures for appointing professional consultants to work on the site, including the requirement for approval by OEH, have ensured that appropriately qualified and technically competent persons have been used.

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The success of this process is demonstrated by the high standard of restoration and adaption works undertaken on the site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 5.8**

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***Do the co-proponents comply with the requirement to engage a suitably qualified Heritage Advisor for the period required by the Heritage Council and DEC?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS appointed a Heritage Advisor through the NSW Heritage Office in October 2003, three years before the commencement of the Project. Since this date the identity of this person has changed several times, but there has always been representation with the appropriate skills and experience throughout the project period.

The current Heritage Advisor is Paul Davies. The qualifications of Paul Davies were provided by MQS to the (then) DEC and Heritage Council on 5 October 2006 prior to his appointment.

**Objective Evidence**

- Paul Davies CV
- 2007 Audit Report

**Notes**

Paul Davies CV was reviewed and confirms that he has suitable experience and qualifications for the position of Heritage Advisor. Mr Davies has been the principal architect and heritage consultant for the restoration and adaption of the Quarantine Station buildings and has had a major role in the success of the project. His continued involvement is of considerable value in ensuring that the heritage values of the site are maintained.

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 6 COMPETENCE, TRAINING AND AWARENESS**

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**Question 6.1**

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*Is there an environmental training program established for the site?*

- Yes  
 No

**Category: Essential + ISO 14001**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** The Induction Program contains units regarded as representing an environmental training program for the site. The units were determined within the Environmental Management Plan, then developed by MQS and the DEC, then reviewed by the DEC to ensure the final product was consistent with the requirements of the Environmental Management Plan.

The modules which have been developed to provide environmental training including natural and cultural values of the site and awareness of the environmental protection procedures to be followed are:

- Module 1 Express Induction
- Module 2 Detailed Induction
- Module 3 Minimal Impact Behaviour
- Module 4 Access and Parking
- Module 5 Emergency and Accident Management
- Module 6 Environment and Heritage Management
- Module 7 Introduction to Conservation and Adaptation
- Module 8 Detailed Conservation and Adaptation
- Module 9 Landscaping and Ground works

A timetable has been established to identify the program/units which need to be covered by each participant, including staff, contractors, consultants, maintenance staff and volunteers, and timing of when participants need to undertake each program. Helen Drew, MQS's Visitor Services Manager, is responsible for implementing the environmental training program. The operations budget contains a training allocation to accommodate refresher courses.

**Objective Evidence**

- EMP 2005
- Examples of training modules
- Staff Interviews

**Notes**

A comprehensive, high quality staff training program has been developed for the site which addresses the environmental values of the site and the actions required of staff to ensure that those environmental values are maintained. There is a gap in training in that it does not address the role of the Sustainability Policy and the EMS. See also Question 1.5.

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**Recommendations – Ranking: I**

See Recommendation 1.5.

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**Question 6.2**

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***Do the co-proponents conduct a periodic environmental training needs analysis to identify the training needs of all personnel whose work may impact upon the environment?***

- Yes  
 No

**Category: Necessary                      Rating: 15                      Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** Training needs analyses for operational staff positions are undertaken by Mirvac as operators of the hotel.

**Objective Evidence**

- Personnel and training records viewed on site
- Staff interviews

**Notes**

Mirvac undertakes training needs analyses for all positions in the hotel operation, which are recorded in personnel files. These analyses include environmental training requirements as well as safety and operational training. The analysis covers in-house training modules as well as formal qualifications and external training.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.3**

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***What percentage of managers and supervisors identified as requiring environmental training have received formal instruction in the Environmental Management Plan at this site or facility?***

- None                      0 points  
 1% to 20%                      4 points  
 21% to 40%                      8 points  
 41% to 60%                      12 points  
 61% to 80%                      16 points  
 81% to 100%                      20 points
-



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**Category: Essential + ISO 14001**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS are each responsible for their own staff and contractors

**Management Assertion**

**OEH:** Quarantine Station Environment Manager, Environmental Performance Manager, Business Operations Officer (responsible for Quarantine Station Lease), OEH Heritage Advisor and Heritage Curator have all been inducted.

**MQS:** 100% of the current MQS management positions have environmental training as per the EMP. The General Manager (Zac Hope), Visitor Services Manager (Helen Drew) and the Site Manager (Todd Durrant). The Induction Program was developed by the previous General Manager and the Visitor Services Manager, with contributions to the relevant units from the OEH (then DECC) Environment Manager. The training program is executed and administered by all managers, they are therefore fully aware of the requirements of the Induction Program and do not need to undertake same as a trainee.

**Objective evidence**

- Director Declaration 2011
- Induction Register

**Notes**

Induction records of selected MQS staff were sighted and confirm they have received HSE training.

The OEH Staff Induction Register for Quarantine Station was reviewed and all managers that have been identified as requiring environmental training have received it as well as refresher courses every year if necessary.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.4**

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***What percentage of employees has received formal instruction in the requirements of the Environmental Management Plan in accordance with the training needs analysis?***

- None 0 points
- 1% to 20% 4 points
- 21% to 40% 8 points
- 41% to 60% 12 points
- 61% to 80% 16 points
- 81% to 100% 20 points
- Not Applicable

**Category: Necessary**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

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**Responsibility:** OEH and MQS are each responsible for their own staff and contractors

**Management Assertion**

**OEH:** All OEH staff and contractors working independently at the Quarantine Station site are inducted and have refresher training if necessary.

**MQS:** 100% of employees have received appropriate environmental training through the Induction Program, relevant to their roles and responsibilities and this training is in accordance with the EMP.

**Objective evidence**

- Induction program
- Induction Register
- EMP 2005

**Notes**

All employees are trained through the Staff Induction Program. See also Question 6.1.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.5**

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***Are all employees at this site or facility provided with formal instruction commensurate with their position description to identify and address:***

- Environmental hazards
- Methods to prevent pollution and environmental damage
- Methods to control spills and releases
- Proper storage and handling of hazardous substances
- Dangerous Goods handling
- The consequences of not complying with the requirements of the Environmental Management Plan, and an EMS
- Not Applicable

**Category: Essential + ISO 14001**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS are each responsible for their own staff and contractors

**Management Assertion**

**OEH:** OEH inducts employees working on the Quarantine Station site depending on their position description and the nature of the work intended with the Quarantine Station induction program outlining which modules are to be provided to which staff.

**MQS:** All employees at the Quarantine Station have been provided with formal instruction

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commensurate with their position description to identify and address the following items:

- Environmental hazards
- Methods to prevent pollution and environmental damage
- Methods to control spills and releases
- Proper storage and handling of hazardous substances
- Dangerous goods handling
- The consequences of not complying with the requirements of the EMP and an EMS

**Objective evidence**

- Induction Program
- EMP 2005 (Chapter 7)
- Mirvac Associate Handbook
- Personnel and training records viewed on site
- Staff interviews

**Notes**

To the extent to which they apply to all employees, these requirements are met through the Staff Induction Program. Additional training is provided for staff with particular responsibilities in accordance with training needs analyses (e.g. hazardous substances training).

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.6**

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***Does the environmental training program include training in waste management that covers:***

- Identification of wastes
- Separation of wastes that can be reused or recycled
- Proper storage of wastes to prevent harm to the environment
- Treatment of wastes, where applicable, to minimise their impact on the environment
- Proper disposal of wastes that cannot be recovered, treated or recycled
- Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** The environmental training programme includes training in waste management and covers the identification of wastes, separation of wastes that can be used and recycled, proper storage and treatment of wastes to prevent harm to the environment, waste removal and disposal procedures.

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**Objective Evidence**

- Mirvac Associate Handbook
- EMP 2005 (Chapter 7)
- Examples of training modules

**Notes**

These aspects of waste management training are addressed in the Staff Induction Program.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.7**

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***Do employees receive environmental training appropriate to their duties in accordance with regulatory requirements?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** All employees receive environmental training appropriate to their duties. The degree of training varies in accordance with their duties. The training is administered through the site induction program. This also includes basic information on contamination and asbestos.

**MQS:** MQS asserts that all employees receive environmental training appropriate to their duties and same is in accordance with regulatory requirements. MQS also relies upon and restates its assertion in answer to Question 6.6.

**Objective evidence**

- Induction Register
- Mirvac Associate Handbook
- EMP 2005 (Chapter 7)

**Notes**

The training which is provided in accordance with the EMP 2005 meets the requirements of the Conditions of Approval.

This training also meets some training requirements of OHS legislation including basic training in the handling of hazardous substances including asbestos and lead paint. Additional OHS training requirements, which in some cases also address environmental matters, are addressed through the Mirvac training system.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.8**

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***Is there a procedure for a periodic review of the environmental training program to determine:***

- The competence of employees to perform those duties that may have an adverse impact on the environment
- The effectiveness of the environmental training program
- The additional environmental training needs of employees based on the results of the review

**Category: Necessary**

**Rating: 15**

**Score: 0**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** This system belongs to MQS and it is therefore the responsibility of MQS to review the system as appropriate. MQS has not provided OEH with any advice on updates to the system to date. The OEH concurs with MQS below in relation to IMAMS and further notes the role of the Lease Control Meetings in addressing staff training needs.

**MQS:** IMAMS raises questions and the responses to same indicate when there is a need to either review the induction programme and/or counsel staff.

**Objective Evidence**

- IMAMS Policy 2006
- Lease Control Meeting Minutes
- Staff interviews
- Site inspection

**Notes**

It is clear from the site inspection and staff interviews that there is a high level of awareness of the environmental values of the site and the practical measures required to maintain these values. Training content has been updated from time to time to take account of changes at the site. The IMAMS monitoring process and issues arising at HSE and Lease Control Meetings also have the potential to identify issues that need to be addressed through training.

There is, however, no formal mechanism for evaluation or reviewing the environmental training program developed to meet the requirements of the EMP 2005.

**Recommendations – Ranking: I**

It is recommended that a requirement for periodic evaluation and review, but not necessarily re-writing, of the environmental training program be included in the revised EMP (as described in Recommendation 4.3), and that the review procedure should include taking

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account of training issues identified through HSE and Lease Control Meetings.

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**Question 6.9**

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***Has a designated spokesperson, in the event of an environmental emergency, received formal training in responding to regulatory agencies, the media, and to the public?***

- Yes  
 No  
 Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS are each responsible for their own staff

**Management Assertion**

**OEH:** OEH protocol is that all media responses or releases in response to environmental emergencies are handled through the OEH Public Affairs Unit. They will then determine who will respond to the media, public or regulatory agencies on behalf of OEH or the Minister. Given that we are the Office of Environment and Heritage the designated spokesperson would have a good understanding of environmental issues and media training is provided to all senior staff required to speak for OEH on environmental issues.

**MQS:** Under the terms of the Lease, the OEH is the landlord of MQS and in the event of any emergency it would be most appropriate for the OEH to comment in consultation with MQS and content input from MQS. Previous practice has always been for the OEH to provide comment (in consultation with MQS) for example, the OEH comments made to the media following Penguin deaths in 2011.

**Objective Evidence**

- Lease

**Notes**

The practice that public comment in the event of an environmental incident or emergency is made by OEH ensures that designated spokespersons have appropriate training and professional support.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.10**

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***Does the environmental manager participate in professional development programs that include:***

- An education program in environmental management conducted by an outside agency leading to a recognised qualification
-

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- Continuing professional development through regular environmental seminars, workshops or other programs covering changes in environmental legislation and good environmental management practice
- Keeping up to date with environmental trends through subscription to newsletters, magazines and update services or membership of professional environmental bodies

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** OEH

**Management Assertion**

**OEH:** Siân Waythe, Quarantine Station Environmental Performance Manager, has a Bachelor of Science in Applied Physical Geography (Hons), a Masters in Applied Science (Environmental Management) and 21 years working in environmental management. Siân has continued her professional education through attendance at training courses, conferences and professional reading. She works for the peak environmental protection authority in NSW and has ample opportunity for environmental enrichment training, examples include:

- Stakeholder engagement training in 2010
- Environmental Impact Assessment and Construction Assessment training in 2010.
- Environmental Law Enforcement Training in April 2007
- Access to online "Ranger Alert" service from OEH library which notifies staff of publications on natural resource management issues
- OEH circulars advising of changes to State environmental legislation, policies and strategies and recent studies or prosecutions

Outside her professional commitments, Siân Waythe is a trained SES rescuer, SES media officer, wildlife carer and member of Warringah Council's Environmental Sustainability Strategic Reference Group. In Siân Waythe's absence, Louise O'Flynn as acting Environmental Performance Manager, will have the opportunity to participate in professional development programmes as they arise.

**MQS:** Concur with the above.

**Objective Evidence**

- Siân Waythe CV
- Louise O'Flynn CV
- Induction register
- Lease Control Meeting Minutes

**Notes**

The Environmental Performance Manager and Acting Manager maintain a high standard of ongoing professional development

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.11**

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***Do the co-proponents' Training Awareness and Competency programs conform to the following additional requirements of ISO 14001?***

- All personnel whose work may create a significant impact on the environment receive appropriate training
- Procedures are established and maintained to make employees or members at each relevant function and level aware of the importance of conforming with the environmental policy and procedures
- Procedures are established and maintained to make employees or members at each relevant function or level aware of the requirements of the environmental management system or program
- Procedures are established and maintained to make employees or members at each relevant function or level aware of the significant environmental impacts, actual or potential, of their work activities
- Procedures are established and maintained to make employees or members at each relevant function or level aware of the environmental benefits of improved personal performance
- Procedures are established and maintained to make employees or members at each relevant function or level aware of their roles and responsibilities in conforming with the requirements of the environmental management system, including emergency preparedness and response requirements
- Procedures are established and maintained to make employees or members at each relevant function or level aware of the potential consequences of departure from specified operating procedures
- Personnel performing tasks which can cause significant environmental impacts are competent on the basis of appropriate education, training and/or experience

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS asserts that the demands of the question have been achieved by MQS and relies upon its objective evidence.

MQS relies upon the findings of the Auditor in the 2007 Audit in relation to this question where it was found that MQS fully complied with induction requirements in relation to staff and contractors in accordance with the Conditions of Approval. The Auditor further found that MQS' induction procedures were reviewed and that they covered the items listed for ISO 14001.

**Objective Evidence**

- Mirvac Associate Handbook
- EMP 2005 (Chapter 7)
- Examples of training modules

**Notes**

Staff induction training based on the EMP 2005 and other staff training programs have been established which meet these requirements. These programs have been maintained since

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the commencement of the project; however there have been only limited efforts to evaluate and review the training programs (see Question 6.8).

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.12**

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***Do the co-proponents comply with the requirement that contractors engaged in the undertaking of the activity must be able to demonstrate a commitment to environmental management by way of commitment to a recognised Environmental Management System in and/or a proven satisfactory environmental management performance record?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Contractors are given appropriate training in accordance with the requirements of the Conditions of Approval.

Any contractors who do not comply with MQS' environmental standards are removed from the site.

**Objective Evidence**

- Mirvac Associate Handbook
- EMP 2005 (Chapter 7)
- Examples of training modules
- Letter from Site Manager, Todd Durrant, to ordering non compliant contractors to leave the site.
- 2007 Audit Report

**Notes**

The 2007 environmental audit was sighted which reviewed a letter from the DEC approving references submitted by each contractor demonstrating a commitment to environmental management. Chapter 7 of the EMP also provides an outline of the environmental training modules that contractors must undertake before undertaking any works.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.13**

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***Do the co-proponents comply with the requirement that all construction, assessment and planning works should be carried out by appropriately qualified staff?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** All construction, assessment and planning works are carried out by appropriately qualified staff.

MQS therefore asserts that it does not believe that contracts and work orders do not need to be reviewed to further substantiate MQS' assertion above.

**Objective Evidence**

- OEH Minor Works Contract
- Staff interviews

**Notes**

This is a standard requirement in government contracts issued by OEH, and MQS asserted that similar requirements are included in their contracts.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.14**

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***Have the co-proponents complied with the requirement that prior to the commencement of works the co-proponents shall submit a list of appropriately qualified and/or experienced heritage specialists (particularly architects, landscape planners and builders) to the Heritage Council and DEC for approval as preferred contractors?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase only

**Responsibility:** MQS

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### Management Assertion

**MQS:** Prior to the commencement of any works, a list of preferred contractors and consultants is submitted to the OEH and the Heritage Office and approved by both parties, unless they have been previously used on site.

### Objective Evidence

- Letters of approval from OEH
- 2007 Audit Report

### Notes

The 2007 Audit was sighted which reviewed consultant profiles for the conservation and adaptation of North Head Quarantine Station dated May 2<sup>nd</sup> 2006. Letters from DEC and Heritage Office were also sighted in the 2007 audit which confirmed that appropriately qualified and experienced contractors and consultants were listed and gained approval prior to the commencement of works.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 6.15

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***Do the co-proponents comply with the requirement that all contractors, subcontractors and consultants working on the site are aware of the relevant conditions of approval for the activity and have been provided with sufficient training and awareness regarding the conservation values of the site?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS are each responsible for their own staff and contractors

### Management Assertion

**OEH:** An induction program is conducted for all OEH contractors, subcontractors and consultants working on the site to comply with Condition of Approval 64. The allocation of the induction program modules is outlined in the Q-Station Induction Program for different participants. Once an induction has taken place staff must then sign a declaration form and the trainer fills out a trainer record. All names are then entered into an induction register.

**MQS:** All contractors, subcontractors and consultants working on the site are made aware of the relevant Conditions of Approval and conservation values of the site through the Induction Program.

### Objective evidence

- Contract Clause under Condition of Approval 65
  - EMP 2005 (Chapter 7)
-

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- Induction Register
- Induction Program
- Q Station Induction Declaration Form
- Trainer Record template
- Mirvac Associate Handbook
- Induction training records

**Notes**

This training is provided through the Staff Induction Program which is delivered to contractors, subcontractors and consultants working on the site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.16**

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*Do the co-proponents comply with the requirement that an induction and training program shall be developed by a suitably qualified person?*

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Siân Waythe and Joanne Stuckey (former Q-Station Environment Officer) provided information for the environmental modules to support the Induction program. Siân Waythe and Joanne Stuckey are both environmental professionals with qualifications in small group training management.

**MQS:** The Induction Program was developed by MQS with input from the (then) DECC in March of 2006. The program was developed by Simon McArthur (then Project Manager and General Manager), John Pastorelli (then Visitor Services Manager and accredited trainer) and Kristian Butcher (then Construction Manager).

Supporting environmental material was provided by Sian Waythe (Environmental Manager).

The Induction Programs are updated from time to time by:

- MQS Director and Environmental Champion Maxwell Player.
- Legal Counsel Suzanne Stanton.
- Site Manager Todd Durrant.

**Objective evidence**

- Siân Waythe CV
  - Suzanne Stanton CV
  - Maxwell Player CV
-

- Todd Durrant CV
- EMP 2005 (Chapter 7)

**Notes**

The Staff Induction Program was developed by a highly qualified team.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 6.17**

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*Do the co-proponents comply with the requirement that an induction and training program shall be provided to all staff, contractors and sub-contractors within 1 week of those persons commencing duties/works?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS are each responsible for their own staff and contractors

**Management Assertion**

**OEH:** Every effort is made to ensure that all staff, contractors and sub-contractors are provided with an induction within 1 week of those persons commencing duties/works.

**MQS:** All contractors complete the induction programme within 1 week of commencing duties or works on site.

**Objective evidence**

- Contract Clause under Condition of Approval 65
- EMP 2005 (Chapter 7)
- Induction training records

**Notes**

The example contract clause requiring contractors to complete the Induction Program does not specify that it has to be completed within 1 week of commencing works. In practice, however, MQS has required that the Site Induction Program be completed before any on site activities are commenced.

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 7 COMMUNICATION**

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**7.1 Communications Management**

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**Question 7.1.1**

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***Have the co-proponents established and maintained procedures for internal communication among the various levels and functions within the organisation in relation to environmental aspects of the project and environmental management systems?***

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH has established and maintained procedures for internal communication among the various levels and functions within the organisation in relation to environmental aspects of the project and environmental management systems. These include:

1. *Property Services team meetings:* The Quarantine Station Environment Team (Environment Manager and Environmental Performance Manager) attend regular Property Services team meetings where important aspects of the project and milestones are noted.
2. *OEH and MQS monthly lease meetings:* OEH and MQS hold monthly planning meetings to discuss environmental management and leasing matters.
3. *Annual Monitoring Report:* Provides information and advice to OEH management and the QSCC on the health of the North Head Quarantine Station, in particular the report summarises the performance in achieving environmental, social, cultural and economic sustainability at the Quarantine Station.
4. *Annual Sustainability Report:* Provides information and advice to OEH management, the QSCC and regulation on the outcomes of sustainability.
5. *Bi-Annual IMAMS Reports* provide interim data so that the results of constant monitoring can be evaluated at regular intervals.

**MQS:** Mawland Quarantine Station has established and maintained procedures for internal communication among the various levels and functions within the organization in relation to environmental aspects of the project and environmental management systems. These being:

1. *Monthly Lease Control Meetings:* MQS concurs with the OEH assertion above in relation to this matter.
  2. *MQS Senior Management Meetings:* Any environmental matters of note are discussed and actioned as necessary by Senior Management who will then communicate matters to other staff as needed.
  3. *Q Station Health, Safety and Environment Committee:* Issues relating to the environmental management and environmental aspects of the project are discussed by this Committee.
  4. *MQS Sustainability Policy:* Section 4.1 of the Sustainability Policy sets out the practical implementation of MQS' environmental management system for the environmental aspects of the project.
  5. *MQS Induction Procedures:* The MQS induction procedures operate as a system to
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communicate the environmental aspects of the project as well as its practical operation to all levels of staff relevant to their function.

6. IMAMS: IMAMS Reports (annual and bi-annual) provide feedback on environmental aspects of the project which is then communicated by management to the various levels and functions of the organisation through the operation the processes identified in points 1-4 above.

**Objective Evidence**

- MQS Sustainability Policy 2007
- HSE Committee Minutes
- Lease Control Meeting Minutes
- Annual Monitoring report 2009
- Annual Sustainability Report 2009
- Property Services Meeting Minutes
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011

**Notes**

Section 4.1 of the MQS Sustainability Policy outlines the organisational structure for the environmental management of the Quarantine Station site.

Procedures for internal communication among the various levels and functions within the organisation in relation to environmental aspects of the project and environmental management systems have been established, implemented and maintained.

Records of the site HSE Committee meeting, Property Services meeting and Lease Control Meetings (between MQS and OEH) were sighted which show that they regularly discuss specific environmental management issues on site.

Environmental aspects of the project are monitored through IMAMS and results are reported quarterly, bi-annually and annually which is communicated by management to various levels of the organisation as necessary.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 7.1.2**

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*Have the co-proponents established and maintained procedures for receiving, documenting and responding to relevant communication from external interested parties?*

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

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### Management Assertion

**OEH:** OEH receives relevant communication from external interested parties through email, direct post or via the Minister's Office. Documents are recorded in the OEH record management system (TRIM). OEH responds in writing to all written correspondence (via email or post), which is recorded in TRIM. Another important component for documenting and responding to communication from external parties is the monthly MQS/OEH Lease Control Meeting. A fixed agenda item at the monthly MQS/OEH Lease Control Meeting is the review of the Quarantine Station Complaints Register. This is an opportunity for MQS/OEH to record and discuss any complaints and/or comments received and to determine the appropriate course of action if necessary.

**MQS:** Communications from external parties on environmental matters affecting the site are generally discussed with OEH at Lease Control Meetings, and in most instances OEH takes responsibility for responding.

### Objective Evidence

- Lease Control Meeting Minutes
- Lease Control Meeting Agenda
- QSCC Agenda
- QSCC Minutes
- Complaints register

### Notes

Because OEH retains policy responsibility for the site, it is appropriate that they assume responsibility for responding to external communications on environmental matters. As a government agency, OEH also has well developed systems for managing the communications process.

The auditors confirmed the arrangements by which communications from external parties on environmental matters affecting the site are discussed at Lease Control Meetings.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 7.1.3

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***Have the co-proponents established and maintained procedures for communicating with external interested parties about environmental aspects of the project?***

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

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## Management Assertion

**OEH:** The OEH and MQS have established a Quarantine Station Community Committee. Environmental aspects of the project are one of the issues discussed at Quarantine Station Community Committee meetings. Community Open Days are also held twice a year (April and September) and provide an opportunity for interested community members to visit the site and ask OEH staff questions about the project or the Quarantine Station site in general. The OEH and MQS have placed approved site wide plans and other general information on the OEH website to provide information to external interested parties about environmental aspects of the project.

**MQS:** MQS has established and maintained procedures for communicating with external interested parties about environmental aspects of the project through the following means:

- Discussion and dissemination of environmental information through the QSCC.
- Community Open Days.
- The Q Station Website contains a large amount of environmental information, including applicable policies such as the Sustainability Policy.
- All site wide plans and policies such as IMAMS have been made available to Manly Library.
- Environmental information pertaining to the project has been placed on site by MQS for view by site visitors in ways such as signage as well as information left in visitor guest rooms.

## Objective Evidence

- QSCC Agenda
- QSCC Minutes
- MQS Sustainability Policy 2007 available online:  
<http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>
- IMAMS Policy 2006 available online:  
<http://www.qstation.com.au/pdfs/070803IMAMSFinal.pdf>
- IMAMS Bi-annual Report April – December 2008 Available online:  
<http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf>
- Quarantine Station Plans of Management Available online:  
<http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm>
- Visitor Information
- Visitor Literature
- Environmental information displays on site
- Community Open Day Questionnaires

## Notes

The co-proponents have maintained the public information mechanisms set up during the project approval process, including the QSCC, Community Open Days and the provision of documentary information. A six-monthly newsletter was published during the construction phase.

Information on the environmental aspects of the project is an important part of the interpretation of the site to visitors, and is included in interpretive material provided across the site.

The Quarantine Station website was reviewed and found to provide copies of the MQS Sustainability Policy, the IMAMS Policy and IMAMS reports. The OEH website was also reviewed and found to have several of the approved plans available, including the Erosion

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and Sedimentation Control Plan, the Waste and Noise Management Plans, Heritage Landscape Management Plan and Conservation Works Program, Stage 1. The Manly Library online catalogue was reviewed and found to have several plans available for public viewing as well as the IMAMS policy and MQS Sustainability Policy. Minutes from the Quarantine Station Community Committee meetings have been sighted which indicates that environmental aspects of the Quarantine station project are discussed.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 7.1.4**

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***Has a Quarantine Station Community Committee been established and does it continue to meet as provided for in the Conditions of Planning Approval?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** A Quarantine Station Community Committee (QSCC) was established in November 2004. The QSCC is comprised of nine members and an independent Chair. The first QSCC meeting was held on 16 December 2004. The QSCC continues to meet several times every year (generally quarterly). Minutes are recorded for each meeting and approved at the following meeting. The most recent meeting was held on Wednesday 16 November at the North Head Quarantine Station. The first meeting of 2012 is set for Wednesday 15 February 2012.

**MQS:** Concur with OEH above.

**Objective Evidence**

- QSCC Minutes
- QSCC Agenda

**Notes**

The 2007 audit reviewed correspondence verifying the appointment of QSCC members and DIPNR's approval of the chair (letter dated 8/12/2004). QSCC meeting minutes were sighted which confirms regular meetings are held and documented.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 7.1.5**

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***Do the co-proponents comply with the requirement to provide the Quarantine Station Community Committee with information and facilities as provided for in the Conditions of Planning Approval?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The Community Committee is provided with regular information including:

- environmental planning information
- environmental performance and management of the activity
- IMAMS monitoring reports
- Site Wide Plans and Site Wide Plan reviews
- QSCC minutes are kept on file in the OEH site office and are available to the public.
- Q-Station provides meeting facilities

**MQS:** Concur with OEH above.

**Objective evidence**

- QSCC Minutes
- QSCC Agenda

**Notes**

QSCC Meeting Minutes and Agendas were sighted which confirm that the Committee is provided with the appropriate information, resources and facilities to carry out its functions. It is evident from the QSCC minutes that the Committee's comments and recommendations are considered and responded to by the co-proponents.

**Recommendations – Ranking: N**

There is no recommendation.

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## 7.2 Complaints Management

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### Question 7.2.1

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*Have the co-proponents established, publicised and maintained a contact telephone number for queries or complaints from members of the public?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phase

**Responsibility:** MQS

#### Management Assertion

**MQS:** MQS established a contact telephone number for general queries and/or complaints in accordance with the Condition of Approval on 28 November 2006. This phone number has been maintained since that date. The phone number is listed in the White Pages and is also publicised on the Q Station website and on a sign at the entrance to the site.

#### Objective Evidence

- Q Station telephone number white pages online:  
<http://www.whitepages.com.au/busSearch.do?subscriberName=Q+Station+Retreat&location=Sydney+CBD+NSW>
- Q station contact details located on Q station website:  
<http://www.qstation.com.au/contact.php>

#### Notes

The White Pages website and Q Station website provide the telephone number for Q Station general enquiries. The 2007 Audit reviewed an email (dated 28/11/06) to Determining Authority Contacts notifying them of the contact telephone number.

#### Recommendations – Ranking: N

There is no recommendation.

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### Question 7.2.2

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*Do the co-proponents comply with the requirement to maintain a complaints register?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

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### Management Assertion

**MQS:** MQS has a complaint form for each complaint received as well as a complaints register. The complaint forms record the details of any complaint received, actions taken and response times. These forms are then incorporated into the complaints register and are discussed with the Environmental Manager at the monthly Lease Control Meetings.

MQS further notes and relies upon the findings of the 2007 Audit in relation to this question, being:

*“Technically the fortnightly MQS/DECC planning meetings do not meet the CoA requirement to make the complaints register available to the Environmental Manager at the end of each week. However, based on the number and the type of complaints received to date, it is the auditor’s opinion that this does not affect environmental management of the site.”*

The above practice endorsed by the 2007 audit has continued, monthly. The complaints Register is available to the Environmental Manager at any time on request.

### Objective Evidence

- Complaints Register

### Notes

The complaints register is actively maintained and reviewed at Lease Control meetings, where any complaints relating to environmental and other policy matters are addressed. Complaints relating to operational matters are addressed by MQS and Mirvac.

### Recommendations – Ranking: N

There is no recommendation.

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**ELEMENT 8 DOCUMENTATION**

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**Question 8.1**

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*Do the co-proponents comply with the requirement to develop and implement a computer based information management and Geographic Information System (GIS) for the site?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** An outline of the Information Management System/GIS was prepared by the OEH in 2007. The IMS/GIS outline is currently under review.

**MQS:** As per comment for Question 8.2.

**Objective evidence**

- IMS/GIS outline
- IMS/GIS outline review action status database

**Notes**

An outline of the IMS/GIS was prepared by the OEH in 2007. This outline sets out the data stored in the GIS along with linked data stored in other management information systems.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 8.2**

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*Do the co-proponents comply with the requirement to undertake a review of the information management and GIS system every five years after the commencement date for the duration of the activity?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Operational Phase only

**Responsibility:** OEH

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### Management Assertion

**OEH:** The five yearly review of the GIS/IMS Outline is currently underway. An important part of the review is the plan action status database which identifies the current status of each plan action (i.e. complete, incomplete, ongoing or no longer relevant). This component of the plan review is an effective way for OEH and MQS to determine how effectively the plan has been implemented and to identify any plan actions that are not yet complete. The OEH was responsible for completing the initial plan review. MQS then had the opportunity to provide comments which were subsequently included in the plan review document.

In November 2011, the review was tabled at the QSCC meeting. QSCC member comments on the review are due by 27 January 2012. The OEH will then prepare a submissions report outlining all QSCC comments to be tabled at the QSCC meeting on 15 February 2012 for further discussion. Any changes resulting from QSCC comments that the OEH and MQS deem necessary will be made to the review document.

Following QSCC consultation, the next step in the review process is for the GIS/IMS Outline review to undergo stakeholder consultation (as set out in the Conditions of Approval). OEH will prepare a submissions report outlining all regulator comments. Any changes resulting from regulator comments deemed necessary by the OEH and MQS will be made to the review document. The QSCC and regulator submission reports will become attachments of the IMS/GIS outline review.

**MQS:** Concur with OEH above.

### Objective evidence:

- Entire Site wide plan review action status database
- IMS/GIS outline review action status database
- QSCC Agenda
- Item 3: Co-proponents review of site wide plans

### Notes

The five yearly review of the IMS/GIS is currently under way and a consultation process is being undertaken. This is largely technical review which addressed changes in database systems. Technological changes have provided for some improvements in the accessibility of information through the system.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 8.3

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***Do the co-proponents maintain an Environmental Manual or electronic library that summarises and provides direction to documents relating to the Environmental Management Plan?***

- Yes  
 No

**Category: Essential +ISO 14001**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

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**Responsibility:** OEH

**Management Assertion**

**OEH:** The EMP for the project fulfils the Environmental Manual role in that it refers to guiding policies and legislation in Chapter 4 and also provides reference to the origin of each environmental safeguards in Chapter 10. These references allow the reader to clarify further what is required. The main reference material includes:

- NSW legislation which may be downloaded at: [www.legislation.nsw.gov.au](http://www.legislation.nsw.gov.au).
- Project planning approval, EIS and Preferred Activity Statement - copies held in OEH Quarantine Station office. A copy of the EIS (excluding appendices) is also available electronically in PDF form.
- Site-wide plans – copies are available on the [OEH website](#), OEH office and the MQS office.

**MQS:** Concur with OEH above.

**Objective Evidence**

- EMP 2005
- MQS Sustainability Policy 2007
- Quarantine Station Plans of Management Available online:  
<http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm>

**Notes**

The EMP 2005 has been used as the environmental manual for the site. The Sustainability Policy also performs the functions of an environmental manual, providing direction to other documents and systems relevant to the environmental management of the site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 8.4**

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***Do the co-proponents maintain inventories of operating procedures which if not carried out correctly may result in harm to the environment?***

- Yes  
 No

**Category: Essential +ISO 14001**

**Rating: 20**

**Score: 0**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** OEH does not maintain inventories of operating procedures specific to the Quarantine Station. Instead it uses the EMP and standard OEH Job Safety Analysis procedures (JSA) which contain operating procedures.

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**MQS:** MQS does not maintain inventories of operating procedures, rather it uses the Lease and the Conditions of Approval as the governing framework to maintain and implement operating procedures designed to allow the conduct of operations with minimal environmental impact. Examples of these operating procedures include:

- Induction Programme
- Sustainability Policy
- IMAMS Policy
- Heritage Landscape Management Plan
- Staff and contractor induction procedures
- Visitor Management Plan – especially appendices H – K being the Minimal Impact Codes
- Infrastructure Control Plan

**Objective evidence**

- EMP 2005
- Management Plans
- OEH JSA
- OEH JSA Procedure

**Notes**

The co-proponents do not maintain inventories of operating procedures which may result in environmental harm if not carried out correctly. This is of particular relevance to the hotel operation where Mirvac standard operating procedures in areas such as cleaning or waste management may have environmental implications for the site. The 2007 Audit also noted that these operating procedures should include requirements for periodic review of their effectiveness.

This will become increasingly important if the revised, risk-based approach to environmental management proposed by Recommendation 4.3 is adopted.

The auditors did not, however, identify any specific deficiencies in operating procedures that represented a risk of environmental harm.

**Recommendations – Ranking: I**

It is recommended that the revised EMP include an inventory of operating procedures which control risks associated with the environmental aspects of the operation, and address arrangements for monitoring and periodic review of their effectiveness.

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**Question 8.5**

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*Using your professional judgement, evaluate the effectiveness of the integration of environmental management documentation with documentation relating to other management systems within the organisation. (Professional Judgement)*

Auditor's Professional Judgement

**Category: Professional Judgement**

**Rating: 20**

**Score: 15**

**Application:** Construction and Operational Phase

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**Responsibility:** Joint

### Management Assertion

**OEH:** The majority of documents for the site have substantial environmental content, therefore the OEH and MQS have achieved substantial compliance with this question. The Conditions of Approval of the project set out extensive site planning and environmental management obligations of the co-proponents. In drafting the adopted EMP, the OEH attempted to capture the environmental obligations arising from the Environmental Impact Statement, Preferred Activity Statement, Conditions of Approval, the Lease and environmental legislation generally, as well as good environmental practice in the one document.

These often disparate obligations are linked together under common subject areas (or environmental aspects or impacts). This successfully provided the co-proponents with an opportunity to clearly identify their environmental obligations for the project.

In some cases the EMP's environmental safeguards make direct reference to other site wide plans and project documentation. For example, FF6 refers to the Heritage Landscape Management Plan, while FF18 refers to Minimal Visitor Impact Codes. Additionally, for all of the EMP's environmental safeguards, suggested evidence of implementation of the safeguard is provided in the column titled "Compliance Record." The compliance records include site wide plans, completed standard forms and registers and monitoring reports. In this way the EMP provides a comprehensive directory to the operational documentation.

To further assist in the integration of environmental management documentation with documentation relating to other management systems, an outline of the information management system/geographic information system has been approved (as per Condition 67). As required by Condition 68, the primary role of the system is to document decision making by providing a record of all works and management actions undertaken, and to provide current information on resources and assets at the site. The IMS/GIS outline is currently under review. An important part of the review is the action status database which helps the OEH and MQS to evaluate the effectiveness of the implementation of the system and also to identify outstanding actions.

**MQS:** Concurs with the OEH above, refers to the Auditor's 2007 comments and relies upon the responses to Question 8.4.

### Objective evidence

- EMP 2005

### Notes

Environment documentation has had a primary role in the construction phase of the project and for land management on site.

Hotel operations conducted by Mirvac are based on Mirvac's own safety and operational procedures. There has been an effort to ensure that Mirvac procedures are consistent with the particular requirements of environmental management on site, however there has been no comprehensive, documented review of Mirvac procedures to ensure consistency.

### Recommendations – Ranking: I

It is recommended that in the context of development of the revised EMP, a documented review of safety and operational procedures for hotel operations be undertaken to identify

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changes, if any, that may be required to ensure compliance with environmental requirements at the site, and that similar analysis be undertaken when procedures are revised.

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**Question 8.6**

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***Do the co-proponents maintain a procedure or process for the periodic review of environmental documentation to ensure that it is up to date and relevant to the operations and activities of the organisation?***

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** All environmental documentation relating to the project, in particular the site wide plans are required under the conditions of approval to be reviewed after five years of adoption. In accordance with the conditions, the site wide plans are currently being reviewed by OEH and MQS.

**MQS:** Concur with OEH above.

**Objective evidence**

- Project Plan – Site wide plan review

**Notes**

The requirement for a five-yearly review of the EMP and site wide management plans is of particular relevance at this stage, as it marks the conclusion of the construction phase of the project.

A five yearly review cycle, while appropriate for strategic planning documents, is not suitable for documentation addressing the day-to-day environmental management of the site. Most EMS's compliant with the ISO 14001 standard provide for annual or biennial review of documentation.

**Recommendations – Ranking: I**

It is recommended that the revised EMP provide for review of operational environmental management documentation on an annual or 2 yearly basis.

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## ELEMENT 9 CONTROL OF DOCUMENTS

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### Question 9.1

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***Do the co-proponents maintain a procedure or process for the control of documents relating to environmental management that includes:***

- Identification of environmental documentation in either paper or electronic form
- Orderly maintenance of environmental documentation, including removal of obsolete documents
- Location of environmental documentation
- Periodic revision of environmental documents including the date of the last revision and the next revision
- Approval of environmental documentation by an authorised person

**Category: Recommended +ISO 14001**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

#### **Management Assertion**

**OEH:** There is a plethora of environmental documentation to control. All environmental related documentation is labelled and kept in a specified location at the OEH site office. Approval of environmental documentation is signed by an authorized OEH employee. The person authorized to approve a document will vary depending upon the significance of the document. For example, the person authorized to approve the adoption of a site wide plan will likely be different to the person authorized to approve environmental documentation pertaining to a more minor matter.

As per the Conditions of Approval, site wide plans are reviewed every five years and thus are currently under review in 2011/2012.

The IMS/GIS was drafted in 2007 and became operational in 2008 in accordance with the Conditions of Approval. Like the other site wide plans, the IMS/GIS outline is currently under review. The review has included the population of a database that outlines the status of each plan action. The OEH review has been considered by MQS and their comments have been added to the review. The review was sent to the QSCC at the meeting on 16th November for their consideration and comment. Following QSCC consultation, the next step in the review process is for the GIS/IMS Outline review to undergo stakeholder consultation (as set out in the Conditions of Approval). It is anticipated that stakeholder consultation will be undertaken in 2012.

The document control system used by OEH is known as TRIM. Information and data including environmental documentation relating to the Quarantine Station project and site are kept electronically on the OEH/OEH share drive and in paper form on TRIM files. The TRIM files relating to the Quarantine Station are located at the OEH site office. Key documents recorded in TRIM (i.e. correspondence, reports etc.) are given a unique number and may be searched for electronically and then retrieved manually. This procedure is in accordance with the OEH records management policy. See also response to Question 9.3 regarding review and approval of documentation.

**MQS:** Concur with OEH above. In addition, under Clause 4A of the Lease it is the responsibility of the Landlord to develop, implement and maintain the Information Management and Geographic Information System, which is the formal document control

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process for the project.

Under Clause 4A.2A of the Lease, the Tenant (MQS) must supply information to the Landlord to assist the Landlord to meet their obligations in relation to the IMS/GIS. MQS has complied with this requirement at all times and has received no material notification to the contrary.

#### Objective Evidence

- TRIM files inspected at OEH Quarantine Station site office
- OEH Records Management Policy 2011

#### Notes

Controlled documents relating to the environmental management of the site are managed by OEH using standard departmental document management and control procedures based on the TRIM document management system. MQS relies on OEH to maintain the document control system.

#### Recommendations – Ranking: N

There is no recommendation.

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#### Question 9.2

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***Are current versions of environmental documentation readily available to personnel undertaking operations, which if not carried out correctly, may cause environmental harm?***

- Yes  
 No

**Category: Essential +ISO 14001**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS

#### Management Assertion

**OEH:** Environmental documentation, including the Environmental Management Plan, MQS Sustainability Policy, Environmental training program modules and site-wide plans are available at the MQS/OEH offices in paper form for all personnel undertaking operations which may cause environmental harm if not carried out correctly.

OEH staff undertaking activities on site are to complete a Job Safety Analysis (JSA). The JSA provides the steps involved in an activity, the potential hazards and controls. Examples of these works include fox and rabbit baiting and pesticide use.

**MQS:** All current versions of environmental documentation, including the Environmental Management Plan, Environmental training program modules, the Sustainability Policy, work orders and approvals as well as all site wide plans are readily available in hard copy form for all personnel undertaking operations which may cause environmental harm if not carried out correctly and this is specifically drawn to attention in the induction process.

The comments of 2007 auditor have been taken into account and/or will be raised as a part of

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the review.

**Objective evidence**

- Quarantine Station Plans of Management Available online:  
<http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm>
- Documentation viewed on site at OEH and MQS offices

**Notes**

OEH maintain a comprehensive electronic document management system. MQS maintains paper copies of current approved versions of all environmental documents for reference by personnel on site, and most key documents are available on line.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 9.3**

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***Are operating procedures relevant to environmental management included in a document control system that includes periodic reviews and approval of changes to operating procedures by authorised personnel?***

- Yes  
 No

**Category: Necessary +ISO 14001**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** All site wide plans have been approved by authorised personnel as shown on each plan's "Declaration and Approval" page. The Environmental Management Plan and all other plans are subject to review every five years in accordance with the CoA. The site wide plans are currently under review in 2011/2012. The reviews are being undertaken by OEH and MQS and will involve consultation with the QSCC and regulators.

Many activities undertaken by the OEH on site are subject to Job Safety Analysis (JSA) procedures, e.g. JSA Fox baiting using 1080, JSA Rabbit warren fumigation, JSA Ground shooting operations and JSA Rabbit monitoring and control. JSA's undergo regular review and approval (when revised) by the Area Manager, Harbour North.

**MQS:** MQS relies upon the assertions given in response to Questions 9.1 and 9.2. Furthermore, the main document control system and process that provides for periodic review and approval of environmental documentation is the governing framework of the Lease and Conditions of Approval.

**Objective evidence:**

**OEH:**

- Site wide plans (declaration and approval page)
-

- OEH JSA
- OEH Records Management Policy

**Notes**

Controlled documents are subject to approval in accordance with OEH Departmental procedures.

**Recommendations – Ranking N**

There is no recommendation.

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**Question 9.4**

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*Do the co-proponents periodically review documentation relating to the Environmental Management Plan, maintained by others, to ensure that environmental protection requirements are included?*

- Yes  
 No

**Category: Necessary +ISO 14001**

**Rating: 15**

**Score: 0**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** See response to Question 8.6 and 9.3. The Quarantine Station Environment Manager reviews all MQS produced environmental documentation that is presented for review and/or approval of the OEH. Currently the Quarantine Station site wide plans are being reviewed as required by the Conditions of Approval.

**Objective evidence**

- Site wide plans

**Notes**

This question relates to documentation not maintained under the joint arrangements between OEH and MQS, most notable operating procedures maintained by Mirvac for the hotel operation. There is no formal mechanism for review of this documentation in relation to the EMP. See also Question 8.5.

**Recommendations – Ranking: N**

See Recommendation 8.5.

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**Question 9.5**

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***Do the co-proponents maintain a procedure or process for requesting changes to approved controlled documentation to ensure that changes to documents relating to environmental management are considered during the periodic review?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** OEH

**Management Assertion**

**OEH:** The process involves suggested amendments being sent to the document author or staff member responsible for the plan. It is this person's responsibility to retain the suggested amendments until the next scheduled plan review. At the time of a review, any suggested amendments considered unless the nature of the amendments prompts an earlier review. To date this process for requesting changes to approved plans has worked effectively.

Currently the site wide plans are under review and as part of this process any previously identified changes to plans have been included in the reviews. A good example of this is the review of the Quarantine Station Moveable Heritage and Resource Collection Plan. The OEH Metropolitan Branch Cultural Heritage Curator is responsible for this plan and has over time maintained a list of suggested amendments to the plan which were subsequently included in the current review of the plan in 2011.

**MQS:** MQS are actively participating in the current plan review.

**Objective Evidence**

- Project Plan – Site wide plan review
- OEH Records Management Policy 2011

**Notes**

OEH document control procedures assign responsibility for change control to identified document authors.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 9.6**

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***Does document control relating to environmental management consider the following additional requirements of ISO 14001?***

- Suitable identification of obsolete documents retained for legal and/or knowledge preservation purposes
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- Retention of documents for a specified period
- Procedures for creation and modification of documents
- Responsibilities for creation and modification of documents

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** OEH

**Management Assertion**

**OEH:** The Property Services Section operates an effective records management system by recording and storing documents in the TRIM record management system. This is in accordance with the OEH records management policy. The TRIM system allows document tracking and recovery.

Evidently, the process of document control at the Quarantine Station is the same as for any other section or unit within the OEH. TRIM guidelines are available on the OEH intranet and in-person training courses are held throughout the year. This corporate approach to document control and the availability of information on TRIM for OEH staff makes the passing on of the document control process at the Quarantine Station in the event of staff changeover a smooth process. A good example of this is the recent staff changeover from Sian Waythe to Louise O'Flynn at the Quarantine Station.

The IMS/GIS Outline is the OEH response to the State Records Act and the OEH Records Management Policy.

For the project the two most critical types of documents are the site-wide plans and the Construction Certificate and Section 60 applications for construction works. Each site-wide plan contains a declaration of approval and sign-off page. The original and approved Construction Certificates can be identified by the green NPWS stamp (with date). The Heritage Office also date stamp their approved Section 60 approvals. Stamping prevents approved drawings from being amended after approval.

**MQS:** Concurs with the OEH above and notes these matters are being taken into account in the current review.

**Objective evidence**

- OEH Records Management Policy 2011

**Notes**

Management of controlled documents within OEH takes place in accordance with Departmental procedures which meet the requirements of this question.

**Recommendations – Ranking: N**

There is no recommendation.

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## ELEMENT 10 OPERATIONAL CONTROL

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### 10.1 General Procedures

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#### Question 10.1.1

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*Have the co-proponents complied with the requirement to identify and plan those operations that are associated with identified significant environmental aspects consistent with its environmental policy, objectives and targets?*

- Yes  
 No  
 Not Applicable

**Category:** ISO 14001 Requirement

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phase

**Responsibility:** Joint

#### Management Assertion

**OEH:** Operations associated with significant environmental aspects are identified in the EMP and the measures to minimise these impacts are identified through the site wide plans for example for heritage, noise and other such matters. The plans are consistent with the Sustainability Policy, and established environmental objectives and targets for the project.

Implementation of the site-wide plan actions is clearly demonstrated through the site-wide plan action status database prepared in 2011 as part of the site-wide plan review process.

**MQS:** Concur with the OEH above. Furthermore, operations that are associated with identified significant environmental impacts have been identified and planned in the relevant MQS policies such as the Sustainability Policy, IMAMS Policy, IMAMS Reports, Visitor Management Plan and the HLMP.

#### Objective evidence

- EMP 2005
- MQS Sustainability Policy 2007
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Noise Management Plan
- Heritage Landscape Management Plan
- Waste Management Plan
- Visitor Management Plan
- Site wide plan review action status database

#### Notes

Environmental management at the site has been based on the EMP and associated management plans developed at the commencement of the project. These identified and planned for the environmental aspects of the site as identified at that time. A review of the EMP is currently under way.

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It was important that environmental requirements relating to the construction phase of the project and the establishment of operations were set out clearly in advance. However this approach does not provide the flexibility to identify and respond to environmental issues that may emerge over the remaining life of the project. See also Question 2.2.

**Recommendations – Ranking: I**

See Recommendation 2.2

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**Question 10.1.2**

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***Have the co-proponents established a documented procedure(s) which addresses the following requirements of ISO14001?***

- To control situations where the absence of appropriate procedures could lead to deviation from the environmental policy and objectives and targets
- Stipulates the operating criteria
- Relates to the identified significant environmental aspects of goods and services used by the organisation

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH has established documented procedures to:

1. Control situations where the absence of appropriate procedures could lead to deviation from the environmental policy and objectives and targets. This is provided for in Section 6.2 Emergency Procedures of the Environmental Management Plan. OEH has one onsite Environmental Scientist (Sian Waythe) to assist in controlling situations if required.
2. Stipulate the operating criteria. This is also provided for in Section 6.2 of the EMP. The IMAMS also provides acceptable ranges to guide staff on what may be an unacceptable range and risk.
3. Identify significant environmental aspects of goods and services used by the organisation. The OEH identify significant environmental aspects of goods and services by conducting Environmental Impact Assessments. For procurement and purchasing detail refer to section 10.12.

**MQS:** Concur with the OEH above. In addition, MQS has documented procedures countenancing the above additional requirements of ISO 14001. These include the Sustainability Policy, IMAMS Policy, the EMP and Site Wide Plans such as the Visitor Management Plan, in particular the Minimum Impact Code.

Specifically, MQS has established documented procedures:

1. To control situations where the absence of appropriate procedures could lead to deviation from the environmental policy and objectives and targets – see the EMP, Sustainability Policy and IMAMS Policy.
  2. Stipulates the operating criteria – see Sustainability Policy (in particular section 3) and the IMAMS Policy.
  3. To identify significant environmental aspects of goods and services used by the organisation – see Sustainability Policy section 3 in relation to goods and Site Wide Plans (for example the Noise Management Plan, Visitor Management Plan) generally
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in relation to services.

**Objective evidence**

- IMAMS Policy 2006
- MQS Sustainability Policy 2007
- EMP 2005
- Visitor Management Plan
- Noise Management Plan

**Notes**

These procedures are established by the EMP and associated Site Wide Management Plans.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.1.3**

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***Have the co-proponents implemented a documented procedure(s) which addresses the following requirements of ISO14001?***

- To control situations where the absence of appropriate procedures could lead to deviation from the environmental policy and objectives and targets
- Stipulates the operating criteria
- Relates to the identified significant environmental aspects of goods and services used by the organisation

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** See response to 10.1.2

**MQS:** See response to 10.1.2. In addition MQS asserts that the above requirements of ISO 14001 have been implemented.

**Objective Evidence**

- EMP 2005
- Site Wide Management Plans

**Notes**

These procedures are established by the EMP and associated Site Wide Management Plans have been implemented. Detailed evidence is provided throughout this audit report.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.1.4**

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***Have the co-proponents maintained a documented procedure(s) which addresses the following requirements of ISO14001?***

- To control situations where the absence of appropriate procedures could lead to deviation from the environmental policy and objectives and targets
- Stipulates the operating criteria
- Relates to the identified significant environmental aspects of goods and services used by the organisation

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** See response to 10.1.2

**MQS:** Repeated question, see Question 10.1.3.

**Objective Evidence**

- MQS Sustainability Policy 2007 (Section 3)
- IMAMS Policy 2006
- EMP 2005 (Chapters 6 and 10)

**Notes**

The MQS Sustainability Policy 2007 (section 1.4 page 6) states that, “this policy will be regularly reviewed and updated as existing policies need refining and new initiatives are created”, and lists the information sources which will provide inputs for such reviews. The first review was scheduled for the fourth quarter of 2008 when the first Environment Report was prepared.

In practice, the Sustainability Policy has not been updated since 14 June 2007.

EMP 2005 provides for the EMP and Site Wide Management plans to be reviewed every 5 years. This review is currently under way.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.1.5**

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***Have the co-proponents complied with the requirement to communicate applicable procedures and requirements to suppliers, including contractors?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH and MQS are each responsible for their own suppliers

**Management Assertion**

**OEH:** This is primarily a MQS matter however; OEH communicates its procedures and requirements to suppliers and contractors by placing clauses within OEH standard works contracts and inducting staff and contractors to the site, and also signage on site.

**MQS:** MQS asserts that it has already answered this question both directly and by implication in the responses given for the following Questions and relies upon the assertions and evidence tendered in response to same; Questions 1.5, 1.7, 2.3, 4.8, 5.3, 5.6, 5.7, 6.1, 6.4, 6.5, 6.7, 6.8, 6.12, 6.15 and 6.17.

**Objective evidence**

- EMP 2005 (Chapter 7)
- Contract Clause under Condition of Approval 65
- Induction Program
- Induction Register
- OEH Procurement Manual

**Notes**

Chapter 7 'Environmental Awareness and Training' of the EMP was reviewed which confirms suppliers and contractors are required to undertake induction training before the commencement of works. The Induction register provides evidence that suppliers and contractors who work on site have undergone training. The 2007 audit reviewed the NSW DEC Tender document 'Tender Documents for Reconstruction of Buildings HI and P22, Quarantine Station, Sydney Harbour National Park, Contract No CB-1501-002-05, December 2005' which included clauses relating to cultural heritage, environmental management requirements, waste management, working hours, etc. The 2007 audit also reviewed a fax from MQS to Manly cabs 28/05/07 which confirmed that the training module "Access Information – Taxi Drivers" had been communicated.

Communication of environmental requirements to suppliers in purchasing documentation is considered in Element 10.12.

**Recommendations – Ranking: I**

See Recommendation 10.12.1.

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## 10.2 Cultural Heritage

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### Question 10.2.1

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*Is the project consistent with the DEC Cultural Heritage Strategic Policy?*

- Yes  
 No

**Category:** Corporate Requirement

**Rating:** 15

**Score:** 15

**Application:** Construction and Operational Phases

**Responsibility:** OEH

#### Management Assertion

**OEH:** Yes. Conservation and adaptive reuse of the Quarantine Station is consistent with OEH Cultural Heritage Strategic Policy. Examples are shown below:

OEH Cultural Heritage Strategic Policy 2006 Focus Areas	Examples
Fostering connections between NSW communities (aboriginal and non-aboriginal) and aspects of their heritage managed and protected by OEH.	<ul style="list-style-type: none"><li>Publicly open EIA process for the project including a Commission of Inquiry.</li><li>Establishment and ongoing meetings of the Quarantine Station Community Committee.</li><li>Relationship with Metropolitan Local Aboriginal Land Council.</li><li>Bi-annual community open days.</li><li>Free access to the beach and visitor centre.</li></ul>
Setting standards for heritage management and protection within OEH	Roles of Heritage Architect, Curator, Heritage Advisor and Environment Manager to direct or advise on site works
Promoting the understanding of heritage in its context	Adoption and current review of the Heritage Landscape Management Plan & Conservation Works Program.

#### Objective evidence

- Cultural Heritage Strategic Policy
- QSCC Agenda
- Paul Davies CV

#### Notes

The project is consistent with the OEH Cultural Heritage Strategic Policy.

#### Recommendations – Ranking: N

There is no recommendation.

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**Question 10.2.2**

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***Have the co-proponents complied with the requirement that the use of the site and the undertaking of the activity must continue to be in accordance with uses permissible under the National Parks and Wildlife Act 1974?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** The Quarantine Station Conservation and Adaptive Reuse Project includes the following uses: tourist accommodation; environmental and cultural heritage study centre; cultural heritage tours; food service (including a restaurant/kiosk); visitor centre including retail operations; and conference facilities. This is consistent with S151B of the *National Parks Act 1974* which allows the granting of leases for various purposes with national parks.

**Objective evidence:**

- National Parks and Wildlife Act 1974 Sec151B
- Preferred Activity Statement
- Draft Plan of Management for Sydney Harbour National Park
- Site inspection

**Notes**

The activities conducted on site are consistent with the range of uses provided for in the legislation.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.3**

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***Have the co-proponents, prior to the commencement of any works associated with the conversion of rooms in any of the accommodation buildings, completed a sample adaptation within Building P6 which has been endorsed by the Heritage Council and DEC?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

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**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, MQS completed a sample adaptation of Building P6 in February 2007, prior to commencing with the conversion of rooms in the accommodation buildings. The sample adaptation was approved in correspondence from the DECC dated 8 March 2007 and from the Heritage Office dated 15 March 2007.

**Objective Evidence**

- Site inspection

**Notes**

The 2007 Audit reviewed 'letter of endorsement of Building P6 Prototype from the DECC' (dated 8th March 2007) and 'letter of endorsement of Building P6 Prototype from the Heritage Office' (dated 15th March 2007) which confirms that this requirement has been complied with.

Building P6 was inspected during the site visit.

This requirement was completed on the 15<sup>th</sup> March 2007.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.4**

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***Have the co-proponents complied with the requirement that adaptation of buildings within the First and Second Class Precincts may occur in accordance with the specifications in Table B-2 of the PAS, subject to other approval processes set out in the conditions of approval?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, the relevant buildings have been adapted in accordance with Section 60 applications with compliance with the specifications of Table B-2 of the PAS examined by the relevant authorities. Furthermore, the work was monitored by Paul Davies (Heritage Advisor) who signed off that the work was done in accordance with these requirements.

**Objective Evidence**

- Site inspection
-

**Notes**

Buildings from the First and Second Class Precincts were sighted during the site visit.

**Recommendations – Ranking: N**

There is no recommendation

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**Question 10.2.5**

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*Have the co-proponents complied with the requirement that buildings P1, P2 and the original rooms that are not adapted are to remain intact and essentially unaltered, and are to be available for accommodation and/or interpretation purposes for the life of the approval?*

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** No. By agreement with OEH, one first class room has been retained unaltered for interpretation purposes in building P1

**Objective Evidence**

- Site Inspection
- Interviews with OEH and MQS staff

**Notes**

It was accepted by OEH that it was not feasible to use unaltered rooms for commercial accommodation. It was MQS's judgement that there was no demand for an "authentic" experience of accommodation in rooms without modern facilities, and this has been borne out by subsequent feedback from visitors.

One first class room has been retained unaltered for interpretation purposes in building P1 and is visited during site tours.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.6**

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***If the proposed reconstruction of P21 and P23 and use for environmental and cultural study purposes is to proceed, have the co-proponents complied with the prior conditions set out in the conditions of approval?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** NA

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** In 2011 MQS submitted a formal proposal and plans for the reconstruction of buildings P21 and P23 in accordance with the Conditions of Approval.

MQS is currently waiting on determination and final approval of this application.

**Objective Evidence**

- Interviews with MQS staff

**Notes**

MQS has sought approval for the reconstruction of these buildings based on the conditions set out in CoA 22 relating to the need for space and compliance with heritage requirements. This is a matter for determination by OEH in its approval of the application.

The NSW Heritage Council noted in its comments on the Draft Report that the Council approved reconstruction of buildings P21 and P23 for the purpose of educational accommodation within the 3<sup>rd</sup> Class/Asiatic precinct of the Quarantine Station on 7 March 2012, subsequent to the date of this audit..

**Recommendations – Ranking:** NA

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**Question 10.2.7**

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***Prior to the reconstruction and use of buildings H1 and P22, have the co-proponents complied with the requirements set out in the conditions of approval?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** OEH

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### Management Assertion

**OEH:** Detailed plans were endorsed by the Heritage Office (under delegation of the Heritage Council) on 31 March 2006. The CAAC (Construction Certificate) application for the reconstruction works was approved on 18 November 2005.

### Objective evidence

- S60 approval for reconstruction of H1 and P22
- Works certificate approval

### Notes

The Section 60 and CAAC approvals for reconstruction of buildings H1 & P22, approved on 18 November 2005, were reviewed and indicate the CoA were met. Building H1 and P22 were viewed on site which confirmed construction has concluded.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.2.8

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*Do the co-proponents comply with the requirement that buildings in the Third Class/Asiatic Precinct shall be used only for accommodation, interpretation and education purposes as specified in the PAS?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** Usage of buildings in the Third Class/Asiatic Precinct was agreed with OEH. Part of P14 is currently used for storage of the archival collection.

### Objective Evidence

- Site inspection

### Notes

Buildings in the Third Class/Asiatic Precinct were viewed on site which confirmed that they are used for interpretation, accommodation and education purposes. Building P14 was sighted which confirmed that it is being used for climate controlled storage of the archival collection.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.9**

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***Have the co-proponents complied with the requirements for staging of the works program?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement                      Rating: 20                      Score: 20**

**Application:**    Construction Phase Only

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** Yes, there has been sustainable compliance with the approval of NPWS.

**Objective Evidence**

- 2007 Audit Report

**Notes**

The 2007 Audit reviewed correspondence which confirms that a staging plan was developed, revised and submitted for approval to DEC and Heritage Council which was approved in 2006. The correspondence reviewed in the 2007 audit also shows that in April 2007, the DEC and Heritage Council granted conditional approval for MQS to commence stage 2 of the Staging Plan. This confirms that MQS has complied with the requirements for staging of the works program.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.10**

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***Have the co-proponents complied with the requirements of the NPWS Construction Assessment and Approvals Procedure for all relevant construction works to be carried out under this approval, except where varied by the conditions of this approval?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement                      Rating: 20                      Score: 20**

**Application:**    Construction Phase Only

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**Responsibility:** OEH and MQS are each responsible for works they manage

**Management Assertion**

**OEH:** Yes, OEH has an approval under the CAAP for the reconstruction of buildings H1 and P22 and has acted in accordance with that approval.

**MQS:** Concurs with the OEH above and further notes that a CAAP is prepared and submitted to the OEH for all relevant construction works, as per the Conditions of Approval 35, 37 and 39.

**Objective evidence**

- Works certificate approval
- Construction Certificates for H1 and P22
- OEH Construction Assessment & Approvals Procedure
- S60 approval for reconstruction of H1 and P22

**Notes**

OEH managed the construction assessment and approvals process in accordance with the procedure, maintaining appropriate approvals documentation for all works.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.11**

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*Do the co-proponents comply with the requirement that any application for construction work within the Quarantine Station site must be submitted to the Heritage Advisor for review prior to lodgment with the DEC and Heritage Council?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** OEH and MQS are each responsible for works they manage

**Management Assertion**

**OEH:** All applications for construction work with the Quarantine Station site are submitted to the Heritage Advisor (HA) for review prior to lodgment with the OEH and Heritage Council. The role of the HA falls under the responsibility of the Heritage Office. Works approvals are not required for the following matters where these are undertaken in accordance with the provisions of the Conservation Works Program or relevant site wide plan(s):

- Painting and carpeting;
  - Provision and maintenance of basic essential services;
  - Infrastructure works involving the essential repair/replacement of existing facilities with 'like for like' technology or where this is unavailable appropriate contemporary technology;
-

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- The provision of external lighting, signage and waste receptacles; and
- Minor maintenance repairs or works.

**MQS:** MQS concurs with the above and complies with the same procedures.

**Objective evidence**

- S60 approval for reconstruction of H1 and P22

**Notes**

The 2007 Audit reviewed letter of approval from the Heritage Office for buildings P1, P2 and P13 (dated 22/04/05) and letter of approval for reconstruction of H1 and P22 (dated 31/03/06) which demonstrated that applications were submitted to the Heritage Advisor for reviewing construction applications.

The 2007 Audit also reviewed a letter from MQS to the Heritage Office (dated 01/09/06) outlining the roles and responsibilities of the Heritage Advisor – including reviewing construction applications. Sample Works Approval folders on site for buildings P5, A2 and S1 were reviewed by the 2007 audit. These included Section 60 approvals from the NSW Heritage Office. “Conservation Works Items” were also reviewed for buildings P5 and A2.

**Recommendations – Ranking: N**

There is no recommendation

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**Question 10.2.12**

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***Do the co-proponents comply with the requirement that, prior to works commencing, the co-proponents shall notify the Environmental Manager and provide evidence that the necessary approvals have been obtained in accordance with the NPWS Construction Assessment and Approvals Procedure?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The Environmental Manager is notified of any and all works prior to commencement of works. NB, conservation work does not require approvals.

**Objective Evidence**

- Lease Control Meeting Agenda
  - Lease Control Meeting Minutes
-

**Notes**

The mechanism of notification is the Monthly Lease Control Meeting.

The Lease Control Meeting Agenda was sighted along with Lease Control Meeting Minutes which includes agenda items such as, 'conservation & adaptation program', 'program status', 'applications (i.e. S60, CAAC, OC, REF)', 'current construction work status'. Louise O'Flynn or Sian Waythe has been present at each of these meetings which confirms that the Environmental Manager is aware of works prior to their commencement.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.13**

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***Do the co-proponents comply with the requirement that, prior to any construction works commencing, the co-proponents shall submit the detailed design and working drawings for the project to the NSW Heritage Council for approval?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Details of proposed works are submitted to the NSW Heritage Council in the form of a Section 60 application which includes detailed design and working drawings. OEH has delegated authority to approve Section 60 applications.

**Objective Evidence**

- S60 approval for reconstruction of H1 and P22

**Notes**

It has been standard practice for works applications to be submitted for approval by the NSW Heritage Council.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.14**

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***Do the co-proponents comply with the requirements for archival reporting in the context of the adaptation works?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS complies with the requirements for archival recording. In addition the curator on site assists in this regard.

**Objective Evidence**

- 2007 Audit Report

**Notes**

The 2007 audit reviewed a letter from Heritage Office to MQS 'Conditional Endorsement of Archival Recording for Quarantine Station, Compliance with Conditions of Approval (01/S60/161)', dated 16/6/2006 confirming that the archival recording for the Quarantine Station had been reviewed and considered satisfactory by the Director, Heritage Council.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.15**

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***Have the co-proponents complied with the requirement to prepare and submit a final Conservation Works Program (CWP) to the Heritage Council and the DEC for approval?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** A Conservation Works Programme was approved by the (then) DEC on 12 May 2006 and the Heritage Council on 1 June 2006, endorsing its consistency with the Conditions of Approval. The table of relevant Conditions of Approval located on Page 3 and 4 of the CWP,

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outlines how these conditions are met in the Programme. This table was part of the document approved by the DEC and the Heritage Council.

This was endorsed by the 2007 Audit.

**Objective Evidence**

- CWP

**Notes**

The Conservation Works Program (CWP) was prepared and submitted to the Heritage Council and the DEC for approval. The CWP was reviewed and the approvals were attached. The CWP was approved by Tony Fleming from the DEC on 12/5/2006 and Reece McDougall from the Heritage Council on 14/12/2006. The CWP is consistent with the Conditions of Approval.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.16**

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*Have the co-proponents complied with the requirement that, following the approval of Stage 1 of the CWP, the co-proponents shall undertake the urgent and medium term priority conservation works in accordance with the staging plan for the activity?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has complied with the Staging Plan, undertaking urgent and medium term priority conservation works in accordance with the Staging Plan and NPWS is aware of this position.

**Objective Evidence**

- Staging Plan

**Notes**

Conservation works were conducted in accordance with the Staging Plan. These works are now materially complete.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.17**

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***Do the co-proponents comply with the requirement that all conservation works, excluding minor maintenance repairs or works, shall be conducted in accordance with the Conservation Works Program?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** All conservation works, with the exception of minor maintenance repairs or works, are conducted in accordance with the Conservation Works Program and in consultation with the Heritage Advisor, Paul Davies.

**Objective Evidence**

- CWP

**Notes**

The 2007 audit reviewed a letter to the DEC and Heritage Office from Paul Davies Architects, dated 2/4/2007, titled 'Re: Quarantine Station Conservation Works Stage 1' which states that as part of their role as heritage advisor they have inspected the site and reviewed work status, and that site inspections and advice have been carried out on a regular basis throughout Stage 1. Works under the CWP are now materially complete.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.18**

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***Have the co-proponents complied with the requirements set out in the conditions of approval for regular reviews and revision of the CWP?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

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### Management Assertion

**MQS:** This is addressed by IMAMS and Sustainability Reports.

### Objective Evidence

- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- CWP

### Notes

The CWP 2006 (page 7) states that “the CWP will continue to be reviewed on an annual basis as part of the overall annual environment report (CoA 221)”.

In practice, the CWP has not been updated since June 2006, and works included in the CWP are now materially complete.

The NSW Heritage Council recommended in its comments on the Draft Report that a Cyclical Maintenance Plan which specifically addressed maintenance and operational issues and presents a guide for future works as they arise on the site would be more appropriate, in lieu of a new CMP.

### Recommendations – Ranking: I

It is recommended that the CoA and EMP be revised to provide for the replacement of the Conservation Works Program with a Conservation Management Plan or Cyclical Maintenance Plan which addresses the capital works and maintenance activities required to preserve the heritage values of the site. This Plan, once developed, should be reviewed and revised on a 2 yearly basis.

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### Question 10.2.19

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***Have the co-proponents complied with the requirement to prepare and implement a sampling and replacement strategy for the AC rainwater system and AC vinyl tiles on the site in accordance with the policies outlined in the DACMP?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** MQS has complied with the requirement to prepare and implement a sampling and replacement strategy for the AC rainwater system and AC vinyl tiles on the site in accordance with the policies outlined in the DACMP.

The Sampling and Asbestos Strategy was prepared by Paul Davies Architects for MQS in October 2005 to meet the requirements of the relevant Conditions of Approval. The Strategy forms part of the approved Conservation Works Program and was approved by the DEC on

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12 May 2006 and the Heritage Council on 1 June 2006 as a part of the Conservation Works Program.

### Objective Evidence

- CWP

### Notes

Section 5 'Sampling and Asbestos Strategy' of the CWP includes sampling strategies for asbestos, bathroom and plumbing fit outs, roofing products, fencing etc. Letters of approval from the DEC and Heritage Council attached to the CWP were reviewed which stated that they approve of the CWP which incorporates the 'sampling and asbestos strategy', which confirms that the requirements of CoA were met. The 2007 Audit reviewed a HLA Asbestos Removal Clearance Certificate (dated 30/5/02), indicating that asbestos removal was appropriately conducted. The 2007 audit also reviewed a letter from the HLA Envirosciences to Lidoran Environmental Services (dated 6/6/2007) stating that HLA had conducted an asbestos visual and air clearance for Building P9 at the Quarantine Station, and found the works to be satisfactory.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.2.20

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***Have the co-proponents complied with the requirement to submit a Moveable Heritage and Resource Collection Plan within 12 months of the commencement date?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** OEH

### Management Assertion

**OEH:** The Moveable Heritage and Resource Collection Plan was adopted in 2007. Pages iii-v1 and 6-7 demonstrate how the plan meets the requirements of CoA 85-86. This plan is currently under review.

### Objective evidence

- Moveable Heritage & Resource Collections Management Plan

### Notes

A Moveable Heritage and Resource Collection Plan was prepared for the project in accordance with condition 86, and approved by the Heritage office and DEC in 2007.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.21**

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***Do the co-proponents comply with the requirement that the display, storage, loan and public access of moveable heritage must be undertaken in accordance with the Moveable Heritage and Resources Plan?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, MQS complies with the requirement that the display, storage, loan and public access of moveable heritage must be in accordance with the Moveable Heritage and Resources Plan.

**Objective Evidence**

- Moveable Heritage and Resource Collections Management Plan
- Staff Interviews
- Site Inspection

**Notes**

An interview took place with MQS' Heritage Curator, Rachel Lawrence, who stated that she has read and complies with the Moveable Heritage and Resource Collections Management Plan when dealing with moveable heritage on site. The auditors inspected Building P14 used for archival storage and interpretive displays on site which demonstrate that moveable heritage and items from the resource collection are dealt with in accordance with the Plan.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.22**

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***Do the co-proponents comply with the requirement that the Moveable Heritage and Resources Plan shall be reviewed every five years after the commencement date for the duration of the activity?***

- Yes  
 No  
 Not Applicable
-

Environmental Audit

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** OEH

**Management Assertion**

**OEH:** Policy 7.1, action 7.1.1 and 7.1.2 of the Moveable Heritage and Resource Collection Plan require that the plan be reviewed at least every 5 years, and amended as necessary. The Plan is currently under review in accordance with the Conditions of Approval and Policy 7.1. As part of the review, a database has been populated which identifies the status of each plan action. The next step in the review process is for QSCC members to comment on the review. At the meeting on 16 November 2011, a briefing paper discussing the site-wide plan reviews was tabled together with the Moveable Heritage and Resource Collection Plan for QSCC comment. QSCC comments received will be considered by the OEH. Stakeholder consultation will be undertaken in 2012 following QSCC comment on the review.

**Objective evidence**

- Moveable Heritage & Resource Collections Management Plan
- Site wide plan review action status database – heritage landscape management plan section
- Moveable Heritage and Resource Collection Plan Review coversheet
- Item 3: Co-proponents review of site wide plans

**Notes**

The Moveable Heritage and Resources Plan is currently under review. The site wide plan action status database was reviewed which sets out actions taking place in relation to the review of the plan. The QSCC has also had an opportunity to comment on the review through the briefing paper.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.23**

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***Do the co-proponents comply with the requirement that a site-wide Heritage Landscape Master Plan shall be prepared within 18 months of the commencement date?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The HLMP was prepared and approved in 2006. The plan is being implemented and

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is currently subject to the five yearly Site Wide Plan Review.

**Objective Evidence**

- Heritage Landscape Management Plan
- Site inspection

**Notes**

The Heritage Landscape Master Plan approved by the DEC on 15/9/2006 and Heritage Office on 15/9/2006.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.24**

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*Do the co-proponents comply with the requirement that all landscape works are to be undertaken in accordance with the Heritage Landscape Master Plan?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** All landscaping works have been or are being undertaken in accordance with the HLMP.

**Objective Evidence**

- Heritage Landscape Management Plan
- Site inspection

**Notes**

Landscaping works have been undertaken materially in accordance with the HLMP. Minor variations have been agreed by MQS and OEH at Lease Control Meetings.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.25**

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***Do the co-proponents comply with the requirement that the Heritage Landscape Master Plan shall be reviewed every five years after the commencement date for the duration of the activity?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS complies with the requirement that the HLMP be reviewed every five years. The HLMP review has been completed and is in the process of proceeding to consultation with the QSCC before approval.

**Objective Evidence**

- Heritage Landscape Management Plan review coversheet

**Notes**

The HLMP has currently completed its review and will be submitted to the QSCC for comment before being approved.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.26**

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***Do the co-proponents comply with the requirement to prepare an Inscriptions Management Plan within 18 months of the commencement date?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The Inscriptions Management Plan was prepared as Appendix C to the HLMP and was approved by the Heritage Office on 5 September 2006 and the (then) DEC on 15 September 2006.

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**Objective Evidence**

- Heritage Landscape Management Plan

**Notes**

The Inscriptions Management Plan was prepared as part of the HLMP and approved by the DEC on 15/9/2006 and the Heritage Office on 15/9/2006.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.27**

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*Do the co-proponents comply with the requirement to undertake a review of the Inscriptions Management Plan every five years after the commencement date for the duration of the activity?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** This review is being undertaken as part of the five yearly review of the HLMP.

**Objective Evidence**

- Heritage Landscape Management Plan review coversheet

**Notes**

The Inscriptions Management Plan is reviewed as part of the Heritage Landscape Management Plan. The review has been completed and the plan review has been provided to the QSCC for comment before being submitted for approval.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.28**

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***Have the co-proponents complied with the requirement that no works shall be undertaken on, or in respect to the inscriptions or engravings prior to the adoption of the Inscriptions Management Plan?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS relies upon the evidence and assertions given in Question 10.2.26 to the effect that no works were undertaken on the inscriptions prior to the adoption of the Inscriptions Management Plan.

**Objective Evidence**

- Heritage Landscape Management Plan
- Lease

**Notes**

The Inscriptions Management Plan was prepared as part of the HLMP and approved by the DEC on 15/9/2006 and the Heritage Office on 15/9/2006, which was prior to the commencement of the lease on 26/10/2006. This confirms that no works were undertaken on, or in respect to the inscriptions or engravings prior to the adoption of the Inscriptions Management Plan.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.2.29**

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***Do the co-proponents comply with the requirement that all conservation works on the engravings and inscriptions shall be undertaken by an appropriately qualified and experienced conservation specialist?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

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### Management Assertion

**MQS:** All conservation works on the engravings and inscriptions have been carried out by the appropriately qualified and experienced conservation specialist, International Conservation Services. The qualifications and experience of International Conservation Services were also given to the (then) DECC.

### Objective Evidence

- 2007 Audit Report
- Site inspection

### Notes

The 2007 Audit reviewed a Heritage Council Exemption Notification Form prepared by MQS that provided the Heritage Office with details of the qualifications and experience of ICS as well as an approval letter from the Heritage Office for the Exemption (dated 6/3/2007). An invoice from ICS to MQS (dated 30/3/2007), was also reviewed in the 2007 audit which confirms that ICS carried out work at the site.

A number of the restored inscriptions were sighted as part of the site visit. The restored inscriptions are now a major feature of the site and contribute to site interpretation.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.2.30

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***Have the co-proponents complied with the requirement to arrange for preparation of a site wide plan for internal building fitout within 12 months of the commencement date?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** MQS

### Management Assertion

**MQS:** The Internal Fitout Plan was prepared and was reviewed in the 2007 Audit.

### Objective Evidence

- Interior Fitout Plan – Part 2
-

### Notes

The Interior Fitout Plan – Part 2 was reviewed. It was prepared by Paul Davies the Heritage Advisor. The 2007 audit reviewed a letter from the DECC stating that the plan was approved on 21/5/2007.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.2.31

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***Do the co-proponents comply with the requirement that an Excavation Permit must be obtained before the commencement on site of any works involving potential disturbance of relics?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** All excavation work is conducted in accordance with the CAAP and Section 60 application processes. As part of this process, archaeological impact assessments are conducted which identify if there is a potential for any disturbance of relics, and whether an additional excavation permit is required.

### Objective Evidence

- 2007 Audit Report

### Notes

The 2007 audit reviewed letters that indicated excavation work was subject to assessments to ensure any potential disturbance of relics is avoided or controlled, and to determine if an Excavation Permit is required. No works involving excavation are currently under way.

### Recommendations – Ranking: N

There is no recommendation.

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### 10.3 Aboriginal Heritage

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#### Question 10.3.1

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*Have the co-proponents prepared an Aboriginal heritage management plan?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** OEH

#### Management Assertion

**OEH:** An Aboriginal heritage management plan (known as the Aboriginal Site Management Report) was adopted in 2007 and meets the requirements of Conditions 70 and 71. In accordance with the conditions of approval, the Aboriginal Heritage Management Plan is currently under review. As part of the review a database has been populated that identifies the status of each plan action.

#### Objective evidence:

- Aboriginal Site Management Report
- Action Status Database – Aboriginal Site Management Report

#### Notes

The first 7 pages of the Aboriginal Site Management Report were reviewed which confirmed that the plan was written and compiled by the Aboriginal Heritage Office in 2007. The Action status database for the Aboriginal site management report was sighted which confirms that the plan is currently under review and the status of each action is documented.

#### Recommendations – Ranking: N

There is no recommendation.

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#### Question 10.3.2

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*Have the co-proponents implemented an Aboriginal heritage management plan?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phase

**Responsibility:** Joint

---

### Management Assertion

**OEH:** The Aboriginal heritage management plan (known as the Aboriginal Site Management Report 2007) has been implemented since its adoption. The current plan, in particular the plan action status database clearly shows the plan's implementation by identifying the status of each plan action.

**MQS:** Concur with the OEH above.

### Objective evidence

- Action Status Database – Aboriginal Site Management Report

### Notes

The action status database for the Aboriginal Site Management Report was reviewed which confirms that the plan is implemented. The status of each plan action is identified and documented.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.3.3

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***Have the co-proponents reviewed the Aboriginal Heritage Management Plan every five years after the commencement date, and prepared and submitted revised plans for approval?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Operational Phase Only

**Responsibility:** OEH

### Management Assertion

**OEH:** 2011 marks five years since the Aboriginal Heritage Management Plan's adoption and consequently the plan is currently under review. The review has involved an assessment of the Aboriginal heritage items on site (undertaken in September 2011) and the population of a database that identifies the status of each plan action.

Currently, the plan review drafted by Louise O'Flynn, Environmental Performance Manager and Lee de Gail, Ranger North Head, is with the OEH's Country, Culture and Heritage Division for their input. The Environmental Performance Manager has decided that the Aboriginal Heritage Management Plan will not be provided to the QSCC for comment in accordance with normal practice for the review of management plans, because of the confidential nature of the Plan.

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**Objective evidence**

- Action Status Database – Aboriginal Site Management Report
- Aboriginal Site Management Report Review coversheet
- QSCC minutes (briefing paper)

**Notes**

The Aboriginal Site Management Report is currently being reviewed.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.3.4**

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*Do the co-proponents comply with the requirement that any conservation works for Aboriginal sites are to be undertaken in accordance with the Aboriginal Heritage Management Plan and schedule of conservation works and in consultation with the relevant Aboriginal community group/s?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** No conservation works on an Aboriginal Site have been undertaken to date.

**Objective Evidence**

**MQS:** Not needed.

**Notes**

No conservation works on an Aboriginal site has been undertaken to date which means this question is not applicable at this time.

**Recommendations – Ranking: NA**

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**Question 10.3.5**

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***Do the co-proponents comply with the requirement to undertake on-going consultation with the relevant Aboriginal community groups on aspects of the proposal and operation of the site that relate to Aboriginal heritage?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** See Question 7.1.2

**Objective Evidence**

- Staff interviews

**Notes**

The Aboriginal Heritage Office is commissioned to provide Aboriginal heritage consultation services to the NPWS Harbour North area, including the Quarantine Station (see Question 2.6). The Aboriginal Metropolitan Lands Council has been considered a project stakeholder and is provided with information about the project. See also Question 10.3.4

**Recommendations – Ranking:** N

There is no recommendation.

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**Question 10.3.6**

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***Do the co-proponents comply with the requirement that there shall be no promotion of or public access to Aboriginal sites within the Quarantine Station unless endorsed by the relevant Aboriginal community group/s and the DEC?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** There has been no promotion of or public access to Aboriginal sites within the Quarantine Station lease boundaries.

---

**Objective Evidence**

- Q Station website
- Visitor Literature
- Site Inspection

**Notes**

The Q Station website and on site visitor literature were reviewed and confirmed that Aboriginal sites within the lease boundaries of Quarantine Station are not promoted. The site inspection also confirmed that there is no public access of Aboriginal sites.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.3.7**

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*Do the co-proponents comply with the requirement that a fence shall be installed near the southwest end of Building A14-17 to limit public access to Cannae Point within twelve months of the commencement date?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The fence was installed. The fence was designed and located in accordance with Condition of Approval 76.

**Objective Evidence**

- Site inspection

**Notes**

The fence is in place and maintained.

**Recommendations – Ranking: N**

There is no recommendation.

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## 10.4 Land Management

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### Question 10.4.1

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*Have the co-proponents complied with the requirement to prepare a site wide Infrastructure Control Plan to be submitted within 12 months of the commencement date, which is in accordance with Condition 106 of the Conditions of Planning Approval?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase and Operational Phase

**Responsibility:** MQS

#### Management Assertion

**MQS:** The Infrastructure Control Plan has been submitted and is now under review.

#### Objective Evidence

- Infrastructure Control Plan Review coversheet

#### Notes

The Infrastructure Control Plan was prepared and submitted in accordance with this requirement.

#### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.4.2

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*Do the co-proponents comply with the requirement to undertake a review of the Infrastructure Control Plan every five years after the commencement date for the duration of the activity?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Operational Phase only

**Responsibility:** MQS

#### Management Assertion

**MQS:** MQS has complied with the requirement to undertake a five year review of the Infrastructure Control Plan. This plan has been reviewed as part of the five yearly review of the Site Wide Plans and is currently at the stage of community consultation with the QSCC

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prior to approval.

**Objective Evidence**

- Infrastructure Control Plan Review coversheet

**Notes**

The Infrastructure Control Plan is currently under review as part of the five yearly review of site wide plans.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.3**

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*Have the co-proponents complied with the requirement to submit a preliminary investigation, prepared in accordance with the “Managing Land Contamination: Planning Guidelines” to the DEC prior to any works commencing in areas of potential contamination?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The Environmental Impact Assessment identified three types of potential contamination within the lease area: latent disease within the two cemeteries; fuel spill sites alongside buildings A6 and A18; and any damaged asbestos associated with historic buildings. In terms of cemetery disease risks, a letter from NSW Health (reproduced within the EIS Appendices) confirmed minimal risk of public exposure at the two cemeteries, particularly given the passive use of the sites and no proposal for significant ground disturbance and that no mitigative measures were required.

In terms of fuel spill risks, the EIS Health Chapter found that the diesel spillage around building A18 was minimal, and the proposed use of the building as a maintenance storage facility minimised public contact and could presume to be considered safe – thus no mitigative measures were required. The EIS further found that the contamination around building A6 was likely to pose minimal risk to current uses, but given the proposed use as an outdoor eating area, warranted further investigation via a specific report, prior to the facility being established.

In terms of asbestos risks, the EIS Health Chapter found that most of the asbestos is found as roofing, gutters and downpipes; only the gutters and downpipes have cracks or fretting that warrant any form of risk; and an Asbestos Strategy should be produced that identifies the treatment / removal of all asbestos within the lease area.

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The OEH commissioned contamination specialists (EarthTech) to further investigate contamination in the A6 area – particularly potential soil and groundwater contamination and the implications for a food service area. The First report was issued in 2003. The report found that: the source of the contamination was a decommissioned underground fuel storage tank under building A6, and ash and slag within the surrounding ground associated with the former boilers; contamination exceeded thresholds for the proposed outdoor eating use, requiring either removal or capping in order to proceed with the uses – removal was concluded to be less desirable due to possible flow on effects of exposing the material and the heritage impacts upon the archaeological site; and groundwater tests should be undertaken to clarify any flow-on effects into the watertable.

The OEH commissioned the same contamination specialists to investigate flow on effects into the watertable. The second report (2006) found that: surface water that runs through the contamination area does not exceed guidelines for recreational or drinking water; and neither surface water flowing in the course nor ground water is considered to be a risk to human health.

The Report attached an Excavation Management Plan to provide guidance for any minor excavation works associated with the MQS solution, to minimise potential impacts on construction workers and future users. In a letter dated 30th September 2005, MQS wrote to the OEH proposing a response to the A6 contamination area. The Proposal used the findings of the two investigation reports Plan to propose solutions to each finding. The OEH referred the proposal to EarthTech to check it was consistent with the recommendations.

A series of correspondence between MQS and the OEH resulted in approval of the proposed solution. This correspondence can be summarised as follows:

- on the 21st November 2005, the OEH wrote back to MQS saying that it was satisfied with the use of both concrete slab or pavers as the MQS solution;
- in December 2005 MQS submitted a detailed works design to the DEC for construction approval; and
- on the 9th February 2006 the OEH wrote back to MQS approving the works with a Works Certificate for building A6 and the adjacent outdoor eating area.

It can also be noted that EarthTech decommissioned the Underground Storage Tank in the A6 area. HLA Envirosciences were engaged to assess the contamination and recommended and supervised the remedial action and asbestos clean up for H1. These works were completed by 30 May 2002.

**MQS:** Concur with the OEH above.

**Objective Evidence**

- Asbestos Removal Clearance Certificate for building H1 and H2
- Decommissioning certificate for underground storage tank adjacent to building A6

**Notes**

A comprehensive assessment of land contamination was undertaken which formed the basis for works approvals.

The Asbestos Removal Clearance Certificate for building H1 and H2 and the Decommission Certificate for the underground storage tank adjacent to building A6 were reviewed which confirm that the co-proponents have fulfilled this requirement.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.4**

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***Have the co-proponents undertaken a detailed investigation in accordance with the Guidelines and/or undertaken any necessary remediation work prior to any works commencing in areas of potential contamination, if required by the DEC?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** See response to Question 10.4.3.

**MQS:** See response to Question 10.4.3. This work is ongoing as per asbestos cement sampling strategy.

**Objective Evidence**

- Asbestos Removal Clearance Certificate for building H1 and H2
- Decommissioning certificate for underground storage tank adjacent to building A6

**Notes**

See Question 10.4.3.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.5**

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***Have the co-proponents complied with the requirement to prepare and implement an erosion and sedimentation control plan for all works that involve ground surface disturbance as part of the EMP?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase only

**Responsibility:** MQS

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### Management Assertion

**MQS:** The Erosion and Sedimentation Control Plan was prepared in May 2005 as part of the EMP and was approved by the DEC as appendix 4 of the EMP on 13 July 2005.

### Objective Evidence

- EMP 2005 (Appendix 4)
- Erosion and Sedimentation Control Plan

### Notes

The EMP and Erosion and Sedimentation Control Plan were reviewed which confirmed that the Erosion and Sedimentation Control Plan was approved by the DEC on 13/7/2005.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.4.6

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*Have the co-proponents complied with the requirement to undertake regular inspections of temporary and permanent erosion and sedimentation control devices during the undertaking of any works involving ground surface disturbance?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** MQS undertakes regular inspections of temporary and permanent erosion and sedimentation control devices during any works involving ground surface disturbance.

### Objective Evidence

- Staff interviews
- Site inspection

### Notes

This is provided for in the Erosion and Sedimentation Control Plan and was confirmed to be standard practice. No works involving ground disturbance are currently being undertaken.

### Recommendations – Ranking: N

There is no recommendation.

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**Question 10.4.7**

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***Have the co-proponents complied with the requirement that car park internal areas are to be generally devoid of any vegetation that may harbour or provide a foraging resource for fauna?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has complied with the requirement that the internal areas of car parks are devoid of vegetation that may harbour or provide a foraging resource for fauna (especially Long-nosed Bandicoots).

**Objective Evidence**

- Site inspection

**Notes**

Site inspections of the car parks located on site showed that internal areas are devoid of vegetation that may harbour or provide a foraging resource for fauna.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.8**

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***Have the co-proponents complied with the requirement to plant and maintain native vegetation to screen CP1 and CP5?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has complied with the requirement to plant and maintain native vegetation to screen CP1 and CP5 as per HLMP and drawings. However, as at 2012, there are limitations to the total effectiveness offered by the vegetation screens, including; the relatively young age of the vegetation, the need to maintain some visual integrity in the car park areas for amenity

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**Environmental Audit**

and safety as well as the need to ensure that fire safety and prevention measures are complied with.

**Objective Evidence**

- Site inspection
- Heritage Landscape Management Plan

**Notes**

CP1 and CP5 were viewed as part of the site inspection which confirmed that native vegetation has been planted and maintained to screen CP1 and CP5.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.9**

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*Have the co-proponents complied with the requirement that car parks shall not be enclosed by fencing that may trap individual fauna?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The car parks are not fenced in a fashion that poses a risk of trapping individual fauna.

**Objective Evidence**

- Site inspection

**Notes**

Fencing surrounding the car parks on site were inspected and found to be of a design that is unlikely to trap any individual fauna.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.10**

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***Have the co-proponents complied with the requirement to provide sufficient low-level lighting in the car parks to allow drivers to detect fauna?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has complied with the requirement to provide sufficient lighting in car parks to allow driver safety and the protection of fauna.

**Objective Evidence**

- Site inspection

**Notes**

Lighting in the car parks was inspected and found to have been well designed to meet the requirements of driver safety, minimal visual impact and allowing drivers to detect fauna.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.11**

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***Have the co-proponents complied with the requirement to define the eastern boundary of CP5 by fencing that prevents vehicle access and discourages human access to the adjoining area of Eastern Suburbs Banksia Scrub?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The boundary is defined by gradient but not fenced; this prevents vehicle access and discourages human access to the adjoining area of Eastern Suburbs Banksia Scrub. NPWS has approved this arrangement.

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**Objective Evidence**

- Site inspection

**Notes**

Treatment of the eastern boundary of CP5 provides an effective deterrent to vehicle and human access to the adjoining area of Eastern Suburbs Banksia Scrub.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.12**

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*Have the co-proponents complied with the requirement to ensure that any removal of Eastern Suburbs Banksia Scrub required as part of the construction of CP5 shall be offset by the undertaking of habitat regeneration works?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 0**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Finalisation of this matter is currently under discussion between the parties.

**Objective Evidence**

- Lease Control Meeting Minutes

**Notes**

Discussions have taken place between OEH and MQS as to the extent to which additional habit regeneration works are required, and it is desirable that this matter be brought to a conclusion.

**Recommendations – Ranking: I**

It is recommended that OEH either identify an appropriate area of North Head for MQS to undertake habitat regeneration works to offset habitat loss from the construction of the CP5 car park or remove the requirement from the CoA.

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**Question 10.4.13**

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*Have the co-proponents complied with the requirement to undertake any works requiring the excavation or trenching of areas in stages so that the extent of these activities do not exceed 50 metres at any one time?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**                      **Rating: 20**                      **Score: NA**

**Application:** Construction and Operational Phases

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** This has not been relevant to date.

**Objective Evidence**

**Notes**

This question is not applicable as no trenching exceeding 50 metres has so far been undertaken.

**Recommendations – Ranking: NA**

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**Question 10.4.14**

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*Have the co-proponents complied with the requirement to undertake all infrastructure maintenance and upgrade works in accordance with the adopted Infrastructure Control Plan?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**                      **Rating: 20**                      **Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** All infrastructure maintenance and upgrade works have been undertaken in accordance with the infrastructure control plan, maintenance is ongoing and staged.

**Objective Evidence**

- Works approvals
-

**Notes**

All infrastructure maintenance and upgrade works have been undertaken in accordance with the Infrastructure Control Plan, subject to minor variations agreed with OEH.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.15**

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*Have the co-proponents complied with the requirement that all investigative techniques employed in preparing the Infrastructure Control Plan are non-destructive and non-polluting and comply with the relevant industry guidelines and standards?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The Draft Infrastructure Control Plan which was submitted to the (then) DEC and Heritage Office on 29 January 2007, states that all investigative techniques employed in preparing the plan were non-destructive and non-polluting, and complied with relevant industry guidelines and standards.

**Objective Evidence**

- Infrastructure Control Plan
- 2007 Audit Report

**Notes**

This was verified in the 2007 Audit.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.4.16**

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***Have the co-proponents obtained appropriate approvals for any changes in access tracks to Store Beach?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** There have been no changes to, or applications to change, the access tracks to Store Beach.

**Objective Evidence**

- Site inspection

**Notes**

There have been no changes to access tracks to Store Beach.

**Recommendations – Ranking: NA**

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## 10.5 Flora and Fauna

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### Question 10.5.1

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***Have the co-proponents engaged a person(s) trained in flora and fauna identification and appropriately licensed to monitor construction activities for the duration of the work?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase only

**Responsibility:** Joint

#### **Management Assertion**

**OEH:** Siân Waythe, Quarantine Station Environment Manager has been available on site for the Construction Manager to report directly. Siân Waythe is a member of Sydney Metropolitan Wildlife Services Inc. and as such holds appropriate licenses for wildlife handling and care. Siân is also an OEH/NPWS employee. Todd Durrant, QS Property Manager and his predecessor are/were also trained in wildlife handling. Please note that this is primarily the responsibility of MQS.

**MQS:** Concur with the OEH above but note this is an issue for construction phase only.

#### **Objective Evidence**

- Siân Waythe CV
- Louise O'Flynn CV
- Todd Durrant CV
- 2007 Audit Report

#### **Notes**

The 2007 Audit found that the Construction Manager at the time of construction, Kristian Butchers, held a WIRES certificate (ID 10507). His site diary confirmed that regular inspections were undertaken to ensure no inadvertent impacts on flora and fauna occurred during construction activities. The Environment Manager, Siân Waythe was also available to identify flora and fauna.

Currently, the Acting Environmental Performance Manager, Louise O'Flynn, and the Property Manager (Todd Durrant) have training in wildlife handling.

#### **Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.2**

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***Are any fences or barriers provided for active work areas constructed with appropriate regard to the movement of fauna across the site?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Fencing and barriers used construction safety mesh to temporarily limit public access on the Wharf, alongside buildings in the First and Second Class and at CP5. This material is an orange soft plastic structured in lattice form, providing holes sufficient for wildlife to crawl through.

This was accepted by the 2007 auditor.

**Objective Evidence**

- 2007 Audit Report
- Site Inspection

**Notes**

The 2007 audit sighted temporary fences used for active work areas which were found to allow fauna to move freely around the site. The fences had a 15cm gap available at the bottom to allow for fauna movement.

Temporary fencing currently in use also meets this requirement.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.3**

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***Do the co-proponents comply with the requirement to take measures to prevent the removal of hollow-bearing trees and threatened flora?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

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### Management Assertion

**MQS:** The Condition of Approval 160 has been transferred to both the EMP (at chapter 10.5) and the HLMP (chapter 4) increasing its potential to become a consideration of conservation and adaptation works. An example of a relevant removal of vegetation would be when the route for the funicular stairway was cleared. In this case, a survey of the funicular stairway was conducted by a suitably qualified person and confirmed the location of hollow-bearing trees.

Compliance continues with this obligation.

### Objective Evidence

- EMP 2005 (Chapter 10.5)
- Heritage Landscape Management Plan (Chapter 4)

### Notes

The 2007 Audit reviewed a letter from Re-Garden Horticulture (dated 5/4/2007) which confirmed that an inspection was undertaken in the area of the funicular railway where clearing of vegetation was to take place for the construction of the stairway. Chapter 10.5 of the EMP and chapter 4 of the Heritage Landscape Management Plan were sighted and both included the requirements of CoA 160. During the site inspection the Property Manager Todd Durrant pointed out that all vegetation is left untouched so that dead and hollow fallen trees can be used for fauna habitat.

### Recommendations – Ranking: N

There is no recommendation.

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#### Question 10.5.4

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***Are Existing Coral trees in the Wharf Precinct the subject of regular inspection and maintenance by a suitably qualified person to ensure safe access to this area for site visitors?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** Existing Coral Trees in the Wharf Precinct were inspected in 2005 by a suitably qualified arborist with the results documented in section 4.2 and Appendix B of the HLMP. The trees were inspected in early 2007 and some pruning was undertaken prior to the 2007 Audit. Inspections and care continue, including trimming where necessary.

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**Objective Evidence**

- Site inspection register
- Heritage Landscape Management Plan (chapter 4.2, 5.1 and appendix B)
- Site inspection

**Notes**

The site inspection register was sighted in the OEH office which confirmed that procedures for inspection and maintenance of coral trees in the wharf precinct are implemented to ensure safe access to this area for site visitors. A site inspection of the coral trees in the wharf precinct confirmed that limbs have been recently trimmed.

Appendix B of the Heritage Landscape Management Plan confirmed that the coral trees were included in a Tree Survey conducted by Arborcraft on 4/7/2003.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.5**

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***Is the proposed design and location of any artificial nesting sites or boxes (including for Little Penguins) endorsed by the DEC?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH

**Management Assertion**

**OEH:** The nest boxes for Little Penguins were designed and installed by OEH.

**Objective Evidence**

- Site inspection

**Notes**

Artificial nesting boxes for little penguins located behind the boiler room near the funicular stairway, and other nesting boxes on site were observed during the site inspection.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.6**

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***Have methods and approaches to be used in meeting the monitoring requirements specified in the conditions of approval for Long-nosed Bandicoots and Little Penguins been approved by the DEC?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH

**Management Assertion**

**OEH:** It is the role of OEH to conduct Long-nosed Bandicoot and Little Penguin monitoring activities. The OEH undertake a number of activities to ensure monitoring requirements specified in the conditions of approval for Long-nosed Bandicoots and Little Penguins are met, including:

**1. Long-nosed Bandicoot Foraging Habitat monitoring:** Monitoring is conducted quarterly in selected areas of the Quarantine Station and controlled sites around North Head. These monitoring sites were recommended by the Harbour North Ranger with involvement from OEH Threatened Species Unit and the University of New South Wales. OEH has modified the approved monitoring methodology for monitoring Long-nosed Bandicoot foraging habitat. Spotlight transects are no longer used as they were found to disturb the Long-nosed Bandicoot. The monitoring methodology currently in use was developed by Nelika Hughes from her research on Long-nosed Bandicoots. Bandicoot diggings are counted over a 25 metre transects within 7 hoop quadrants, 2m in diameter spaced 2 metres apart during the day.

**2. Long-nosed Bandicoot mortality register:** North Head roads are inspected each morning for evidence of animal mortality. Any Long Nosed Bandicoot deaths are recorded in a mortality register.

**3. The Heritage Landscape Management Plan:** The Heritage Landscape Management Plan documents actions to enhance and regenerate Long-nosed Bandicoot habitat throughout the site.

**4. Little Penguins:** Penguin wardens have been trained to monitor public activity around known penguin sites.

**5. IMAMS** also specifies monitoring measures and adaptive management responses.

**Objective evidence:**

- North Head Bandicoot Mortality Register
- Heritage Landscape Management Plan (Section 4.2.4)
- Bandicoot foraging habitat monitoring field sheet
- IMAMS Policy 2006

**Notes**

The IMAMS Policy (approved by the DEC in March 2007) was reviewed which outlines the monitoring method and adaptive management responses. It was found that the IMAMS refer to monitoring bandicoots using spotlight transects. However spotlight transects are no longer used and OEH has modified this monitoring method because research has found that

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spotlight transects disturb the Long-nosed bandicoots. This should be revised in the next revision of the IMAMS policy. The Bandicoot mortality register and the bandicoot foraging habitat monitoring field sheet (dated November 2011) were reviewed which provides evidence that these monitoring methods are being effectively implemented. The monitoring methods and approaches to be used in meeting the monitoring requirements specified in the conditions of approval for Long-nosed Bandicoots and Little Penguins are outlined in the IMAMS Policy and Heritage Landscape Management Plan which have both been approved by the OEH. OEH is responsible for conducting the monitoring of both the Long-nosed Bandicoot and Little Penguin.

**Recommendations – Ranking: I**

It is recommended that references in IMAMS to bandicoot monitoring methods be updated to reflect current practice.

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**Question 10.5.7**

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***Have the co-proponents updated signage along Darley Road and into the Quarantine Station within 6 months of the commencement date to strengthen warnings to vehicle drivers regarding the presence of Long-nosed Bandicoots?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** OEH

**Management Assertion**

**OEH:** Bandicoot warning signage can be viewed along Darley Road, North Head Scenic Drive and into the Quarantine Station.

**Objective evidence**

- Site inspection

**Notes**

Bandicoot warning signage is visible on Darley Road and a 'Watch out for Bandicoots' sign indicating the number of road mortalities is located on North Head Scenic Drive. Bandicoot signage was also viewed on the Quarantine Station site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.8**

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***Do the co-proponents meet the requirement that grassed areas be kept in good condition?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** The grassed areas on the site have been maintained in a good condition and in accordance with Condition of Approval 164 and section 4 of the HLMP.

**Objective Evidence**

- Site inspection

**Notes**

Throughout the site inspection it was apparent that the grassed areas have been maintained in good condition. Long-nosed Bandicoots were sighted utilising the open mown grass areas in the First Class Precinct for foraging.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.9**

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***Have the co-proponents undertaken further assessments within 12 months of the commencement date to refine the mapping of high-use Long-nosed Bandicoot foraging habitat and to identify suitable potential areas and techniques for habitat enhancement, reconstruction and rehabilitation?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** OEH

**Management Assertion**

**OEH:** OEH has been conducting Long-nosed Bandicoot foraging habitat monitoring since 2004. Ten sites have been chosen throughout the Quarantine Station to monitor. The Heritage Landscape Management Plan identifies sites within the Quarantine Station for bandicoot habitat enhancement, reconstruction and rehabilitation. These sites have been

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determined by recommendations from the bandicoot monitoring program, advice from the OEH Threatened Species Unit, University of NSW, the OEH North Head Ranger and the Department of Planning, Heritage Office.

The proposed Long-nosed Bandicoot Habitat Enhancement Map in the Landscape Management Plan and some habitat rehabilitation has been undertaken in the first and second class precincts this includes: turfing of former carpark areas and returfing existing grassed areas. OEH is proposing a watering and aeration trial to improve grassed areas for bandicoot foraging.

**Objective evidence**

- Heritage Landscape Management Plan (Section 4.2.4)
- Long-nosed Bandicoot Habitat Enhancement Map and methodology

**Notes**

Section 4.2.4 of the Heritage Landscape Management Plan was reviewed which identifies sites for bandicoot habitat enhancement, reconstruction and rehabilitation, and the further work being undertaken to improve foraging noted.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.10**

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*Have works undertaken for the activity, involving the loss of, or damage to, Long-nosed Bandicoot foraging habitat been offset by the undertaking of habitat enhancement, reconstruction or rehabilitation works on an area elsewhere at North Head that is at least ten times the size of the area impacted?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**OEH:** The HLMP identifies the areas where long-nosed bandicoot habitat is lost and to be offset by habitat enhancement. All stage one actions regarding bandicoot foraging habitat have been complied with, meaning there is a net gain at this point in time. See also Question 10.5.9.

**MQS:** Concur with the OEH above.

**Objective evidence**

- Heritage Landscape Management Plan (Section 4.2.4)
-

**Notes**

See Question 10.5.9.

**Recommendations – Ranking: N**

See Recommendation 10.5.9.

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**Question 10.5.11**

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***Have the co-proponents implemented the monitoring program for the Long-nosed Bandicoot, detailed in Schedule 5 of the Conditions of Approval?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH

**Management Assertion**

**OEH:** OEH has implemented the monitoring program for the Long-nosed Bandicoot, detailed in Schedule 5 of the Conditions of Approval:

**1. *Bandicoot activity and use of foraging habitat:*** Bandicoot foraging habitat monitoring has been conducted quarterly since November 2004. Sites monitored include areas within the Quarantine Station and two control sites around North Head (North Fort and Sydney Harbour Federation Trust lands). Monitoring sites were recommended by the Harbour North Ranger with involvement from OEH Threatened Species Unit and the University of New South Wales. OEH has modified the approved monitoring methodology for monitoring Long-nosed Bandicoot foraging habitat since its commencement. Spotlight transect are no longer used due to the disturbance impacts on the Long-nosed Bandicoot and the variability in equipment and observers. The monitoring methodology was developed by Nelika Hughes from her research on Long-nosed Bandicoots. Bandicoot diggings are counted over a 25 metre transects within 7 hoop quadrants, 2 metres in diameter spaced 2 metres apart during the day.

**2. *Any enhanced, reconstructed or rehabilitated habitat established:*** Any enhanced, reconstructed or rehabilitated habitat is detailed in the Heritage Landscape Management Plan.

**3. *Deaths of Long-nosed Bandicoots:*** All North Head Roads are monitored on a daily basis for evidence of Long-nosed Bandicoot mortalities. Monitoring of Quarantine Station roads is conducted by trained MQS staff. All deaths are recorded in a mortality register with information such as but not limited to date, name of recorder, location, age/sex, microchip number and cause of death. The public can report bandicoot deaths to the OEH office if a bandicoot is found. A sign has been placed at the entrance to the Sydney Harbour National Park, just past Parkhill Arch to provide the public with information and phone numbers required to report these deaths to the OEH. Necropsies on Long-nosed Bandicoot have not been recently performed. OEH apply the following principles to identify vehicles impact and age of animal:

- Adult female 450+ grams (Schedule 5)
  - Adult male 650+ grams (Schedule 5)
-

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- Road deaths are taken to include: bandicoot remains identified on or next to roads (Schedule 5). The locations of bandicoot mortalities have been placed on the Geographic Information System (GIS).

**Objective evidence**

- North Head Bandicoot Mortality Register
- Heritage Landscape Management Plan (Section 4.2.4)
- Bandicoot foraging habitat monitoring field sheet
- IMAMS Policy 2006
- Bandicoot habitat usage database

**Notes**

Specific bandicoot indicators and their corresponding monitoring methods are outlined in the IMAMS Policy. Bandicoot foraging habitat monitoring field sheets (dated 11/11/11); section 4.2.4 of the HLMP 'habitat enhancement' and the bandicoot mortality register were all sighted which indicates that the monitoring program for the Long-nosed Bandicoot, detailed in Schedule 5 of the CoA is being implemented and maintained.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.12**

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***Have measures been taken in consultation with the DEC to reduce the extent of light, noise and activities in areas showing a statistically significant reduction in bandicoot numbers as indicated by results of monitoring over two consecutive years?***

Please select only one response from the list below

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** IMAMS data has shown that light and noise have not contributed to a significant reduction in bandicoot numbers. MQS is currently in consultation with the OEH in relation to bandicoot road mortalities and matters such as traffic calming devices are under consideration. At this date MQS is waiting for correspondence from the OEH outlining proposed strategies and actions.

**Objective Evidence**

- Annual Monitoring Report 2010
-



**Notes**

The 2010 Annual Monitoring Report was reviewed which indicated that bandicoot mortality is most common from traffic. It was also asserted by staff during the site visit that the most common cause of death for bandicoots is mortalities on public roads. Bandicoots were observed foraging actively in lit areas of the site and when guests are present, indicating that current levels of light and noise on the site do not pose a threat.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.13**

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*Do the co-proponents comply with the adaptive management measures for road mortalities of the Long-nosed Bandicoot, detailed in Schedule 6 of the Conditions of Planning Approval?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** See response to Question 10.5.12.

**Objective Evidence**

- Annual Monitoring Report 2010
- North Head Bandicoot Mortality Register

**Notes**

Current operating arrangements for the site have resulted in lower levels of traffic on the site than was anticipated at the time of the planning approval, resulting in a reduced threat to bandicoots.

See also Question 10.5.12.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.14**

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***Have the co-proponents provided a sign at the entrance to Sydney Harbour National Park in accordance with Condition 169A of the Conditions of Planning Approval?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** OEH

**Management Assertion**

**OEH:** OEH provided a sign on 4 May 2007, at the entrance to Sydney Harbour National Park, just after the Parkhill Archway, to indicate the number of Long-nosed Bandicoot road mortalities within the monitored roads of North Head. The sign includes a short statement regarding the endangered status of the bandicoot population, its estimated population size (within North Head) and the threats posed to its continued survival, the total number of road deaths for the previous year and a running tally of the number of deaths for the current year. The tally is updated after each confirmed road death as recorded on the mortality register. The sign includes a 24 hour phone number to allow members of the public to inform the co-proponents of any mortalities.

**Objective evidence**

- Site inspection

**Notes**

The 'Watch out for Bandicoots' sign was sighted at the entrance to Sydney Harbour National Park, located after the Parkhill Archway.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.15**

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***Have the co-proponents complied with the requirement to provide funding to the DEC to undertake a revised population viability assessment (PVA) for the Long-nosed Bandicoot every 2.5 years from the commencement date?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

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**Management Assertion**

**MQS:** The PVA is taking place.

**Objective Evidence**

- Lease Control Meeting Minutes

**Notes**

This assessment is currently taking place.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.16**

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***Do the co-proponents comply with the conditions of any revised recovery plan for the Long-nosed Bandicoot population?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** Discussions continue with the OEH for the best methods of recovery, including installing further traffic calming measures in 2012.

**Objective Evidence**

- Lease Control Meeting Minutes

**Notes**

No formal Revised Recovery Plan has been developed. A number of specific habitat enhancement measures have been implemented or are currently under discussion. See also Question 10.5.9.

**Recommendations – Ranking: NA**

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**Question 10.5.17**

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***Has permanent barrier fencing that maintains access for penguins been provided to actively discourage human access to Little Penguin habitat in accordance with Condition 174 of the Conditions of Approval?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement                      Rating: 20                      Score: 20**

**Application:**    Construction Phase Only

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** The penguin fence was constructed in compliance with Condition of Approval 174. The designs for the fences were approved by the (then DECC) and the Heritage Office in October 2006.

**Objective Evidence**

- Site inspection
- 2007 Audit Report

**Notes**

The CAAP and Section 60 Application were reviewed in the 2007 Audit. The fence was observed during the site inspection.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.18**

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***Do the co-proponents comply with the requirement to provide temporary moveable signage, with appropriate temporary lighting if necessary on Quarantine beach to protect Little Penguins at night during the breeding season?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement                      Rating: 20                      Score: NA**

**Application:**    Construction and Operational Phases

**Responsibility:**                      MQS

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**Management Assertion**

**MQS:** OEH has not notified MQS that they require this action.

**Objective Evidence**

**Notes**

This form of protection has not proved necessary. The site layout and fencing discourage access to Quarantine Beach at night.

**Recommendations – Ranking: NA**

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**Question 10.5.19**

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***Have the co-proponents taken measures to ensure that spotlighting for Little Penguins does not occur from the ferry or within the site unless it is being undertaken as part of an approved special interest tour?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** The Visitor Management Plan contains Minimal Impact Codes which advise against spotlighting unless undertaken as part of a special interest tour.

**Objective Evidence**

- Visitor Management Plan

**Notes**

The Visitor Management Plan was reviewed and found that Appendix I 'Minimal impact code for storytelling tour guides' states that groups should be requested not to use flashes at night in outdoor areas beyond building curtilage and not to direct torchlight directly on animals. Ferry services are not currently operated.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.20**

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***Have the co-proponents negotiated with the DEC an annual contribution to assist the ongoing implementation of any monitoring programs established as part of the Little Penguin Recovery Plan?***

- Yes  
 No

**Category: Regulatory Requirement                      Rating: 20                      Score: 20**

**Application:**    Construction and Operational Phase

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** In compliance with the Lease, MQS makes an annual contribution (currently \$5000) to the OEH for environmental monitoring.

**Objective Evidence**

- Lease (Clause 19A.5 and Schedule 23)

**Notes**

An agreed contribution is made in accordance with this requirement.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.21**

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***Have the co-proponents complied with the requirement to develop, implement and fund a monitoring program that specifically monitors the potential impacts generated by activities within the site, in the event that any monitoring program under the Little Penguin Recovery Plan ceases to operate during the life of the approval?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement                      Rating: 20                      Score: NA**

**Application:**    Construction and Operational Phase

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** It has not been necessary for the parties to consider this matter to date.

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**Objective Evidence**

- Site Inspection

**Notes**

The Little Penguin Recovery Plan continues to operate.

**Recommendations – Ranking: NA**

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**Question 10.5.22**

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*Do the co-proponents comply with the adaptive management measures for the Little Penguin detailed in Schedule 8 of the Conditions of Planning Approval?*

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** It has not been necessary for the parties to consider this matter to date.

**Objective Evidence**

- Staff interviews

**Notes**

These adaptive management measures become applicable only in the event that significant reductions in Little Penguin numbers occur. The auditors were advised that there have been recent reductions in penguin numbers in the Manly area due to the depredations of domestic and feral animals, but that penguins are now returning to the site.

**Recommendations – Ranking: NA**

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**Question 10.5.23**

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*Do the co-proponents provide funding to the DEC to undertake a revised population viability assessment (PVA) for the Little Penguin population every 2.5 years from the commencement date?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

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**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS complies with this requirement as per the terms of the Lease.

**Objective Evidence**

- Lease (Clause 19A.5)

**Notes**

This is included in MQS's annual contribution for environmental monitoring.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.24**

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*Do the co-proponents comply with the requirement to ensure that the undertaking of the activity related to revised trigger thresholds and/or adaptive management measures for the Little Penguin, complies with the revised thresholds and/or measures?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** As per 2007 audit, it is not necessary for the parties to consider this matter at this time.

**Objective Evidence**

**Notes**

No revised trigger thresholds have been established.

**Recommendations – Ranking: NA**

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**Question 10.5.25**

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***Have the co-proponents complied with the requirement to prepare and submit a Predator and Pest Control Plan, in accordance with Condition 188 of the Conditions of Planning Approval to the DEC for approval within 2 years of the commencement date?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** The OEH prepared and submitted a Predator and Pest Control Plan as per Condition 188 of the Conditions of Planning Approval in 2008 which was within 2 years of the commencement date. The Predator and Pest Control Plan is currently under review.

**Objective evidence**

- Predator and Pest Animal Plan

**Notes**

The Predator and Pest Control Plan known as the Predator and Pest Animal Plan was approved by OEH on behalf of the DECC in November 2008 which was within 2 years of the commencement date.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.26**

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***Have the co-proponents complied with the requirement to undertake predator and pest control activities in accordance with the approved plan or, if the plan is yet to be prepared or approved, in accordance with ongoing consultation with the DEC?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** Joint

**Management Assertion**

**OEH:** Predator and pest control activities are undertaken in accordance with the approved Predator and Pest Control Plan. This plan is currently being reviewed in accordance with the Conditions of Approval.

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**MQS:** Concur with the OEH above.

**Objective evidence**

- Predator and pest animal plan action status database
- Fox, Cat and Rabbit abundance database monitoring results

**Notes**

The Predator and Pest animal plan action status database was reviewed along with the monitoring results of the fox, cat and rabbit which confirm that predator and pest control activities are being undertaken and in accordance with the Predator and Pest Animal Plan.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.5.27**

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*Have the co-proponents complied with the requirement to undertake a review of the Predator and Pest Control plan every five years after the commencement date for the duration of the activity, or earlier if considered necessary by the DEC in accordance with Condition 190 of the Conditions of Planning Approval?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** In accordance with the Conditions of Approval the OEH is currently undertaking a five yearly review of the Predator and Pest Control Plan. As part of the review a database has been populated that identifies the status of each plan action. The next step in the review process is for QSCC members to comment on the review. QSCC comments received will be considered by the OEH. Stakeholder consultation will be undertaken in 2012 following QSCC comment on the review.

**Objective evidence**

- Item 3: Co-proponents review of site wide plans
- Predator and pest animal plan action status database
- Predator and Pest Animal Plan review coversheet

**Notes**

The Predator and Pest Animal Plan is currently being reviewed.

**Recommendations – Ranking: N**

There is no recommendation.

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## 10.6 Marine Environment

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### Question 10.6.1

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***Have the co-proponents entered into discussions with the Waterways Authority and NSW Fisheries in relation to measures that could be undertaken to restrict or discourage private boat mooring in the immediate vicinity of the site, and complied with the terms of any agreement resulting from that discussion?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### Management Assertion

**OEH:** Critical habitat for the Manly Little Penguin population was declared by the Minister for the Environment on 20 December 2002. Critical habitat restricts mooring at Quarantine Beach.

**MQS:** Concur with the OEH above.

#### Objective evidence

- Little Penguin information brochure
- Site inspection

#### Notes

The Little Penguin information brochure was reviewed which outlines the restrictions to visitors and vessels. Marked buoys and other signage make clear that mooring is not permitted.

#### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.6.2

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***Have the co-proponents complied with the requirement to develop and implement a program to monitor the density, condition and extent of seagrass beds in the wharf area, in consultation with the Waterways Authority?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

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**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has developed and implemented a program to monitor the density, condition and extent of seagrass beds in the wharf area, in consultation with the Waterways Authority.

The program is to be found at Appendix E of the IMAMS Policy and was approved by the (then) Maritime Authority and the (then) DEC on 29 March 2007.

**Objective Evidence**

- IMAMS Policy 2006 (Appendix E)
- IMAMS Bi-annual Report January-June 2011

**Notes**

Appendix E 'Detailed seagrass monitoring approach' of the IMAMS Policy was reviewed. The 2007 Audit also reviewed an email (dated 1/9/06) from MQS and a letter from DECC (dated 27/3/2006) providing evidence that the Maritime Authority were consulted. IMAMS reports have confirmed that seagrass is monitored and reported on which confirms that the program has been implemented.

The Department of Primary Industries – Fisheries noted in its comments on the Draft Report that the seagrass *Posidonia australis*, populations of which occur in Quarantine Bay, has recently been listed as endangered.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.6.3**

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***Have the co-proponents ensured that implementation of the seagrass monitoring program is to occur prior to the commencement of the ferry services to the site?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS complied with Condition of Approval 185 that the implementation of the seagrass monitoring program by a suitably qualified marine ecologist was to occur prior to the commencement of ferry services to the site, however, no ferry service has been operated to date.

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**Objective Evidence**

- IMAMS Policy 2006 (Appendix E)
- IMAMS Bi-annual Report January-June 2011

**Notes**

Appendix E to the IMAMS Policy 'Detailed seagrass monitoring approach' states that "seagrass and wetland conservation biologist, Terry Domico, will be actively participating in the pilot test and subsequent follow up". The seagrass monitoring program has been undertaken even though no ferry services operate to the site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.6.4**

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*Have the co-proponents complied with the requirement to consult with the NSW Fisheries to implement appropriate measures to reduce impacts and provide habitat compensation if monitoring indicates a significant reduction in the density, extent or condition of the seagrass beds and that such decreases are determined to be related to the activity?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** NA

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** This question is not applicable as monitoring has not indicated a significant reduction in the density, extent or condition of the seagrass beds.

**Objective Evidence**

- IMAMS Bi-annual Report January-June 2011
- IMAMS Quarterly Report April – June 2011
- Annual Monitoring Report 2010

**Notes**

Monitoring has not indicated a significant reduction in the density, extent or condition of the seagrass beds.

**Recommendations – Ranking: NA**

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**Question 10.6.5**

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***Have the co-proponents complied with the requirement to seek approval for any upgrades to the Quarantine Station wharf or the provision of additional ferry services or watercraft access to the Quarantine Station?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:**           MQS

**Management Assertion**

**MQS:** Yes, the wharf has been upgraded accordingly.

**Objective Evidence**

- Email correspondence between MQS and OEH regarding QS wharf upgrade.

**Notes**

Email correspondence from MQS to OEH in relation to upgrading the QS wharf was sighted. The 2007 audit also reviewed a letter from NSW Maritime, 'Application for Construction – Quarantine Station Wharf', (dated 18/6/07) which approves MQS's application for the proposed construction works. No ferry services have been operated to the site.

**Recommendations – Ranking: N**

There is no recommendation.

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## 10.7 Transport and Visitor Access

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### Question 10.7.1

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***Have the co-proponents complied with the requirement to prepare and submit a final Access Strategy for the site to the DEC and DIPNR for approval within 6 months of the commencement date?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

#### **Management Assertion**

**MQS:** MQS has complied with the above requirements to prepare and submit a final Access Strategy for the site to the DEC and DIPNR for approval within 6 months of the commencement date.

#### **Objective Evidence**

- Visitor Management Plan

#### **Notes**

The Visitor Management Plan containing the Visitor Access Strategy, Security Plan and Emergency and Evacuation Plan was reviewed. Appendix A 'Meeting the Approval Conditions' of the Visitor Management Plan demonstrated that it met all relevant CoA including condition 118. The Visitor Management Plan was approved by the DEC on 13/7/05 and the DIPNR on 10/8/05 within 6 months of the commencement date.

#### **Recommendations – Ranking: N**

There is no recommendation.

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### Question 10.7.2

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***Have the co-proponents complied with the requirement to implement the Access Strategy for the site once it has been approved by the DEC and DIPNR?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

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### Management Assertion

**MQS:** MQS has implemented the Visitor Management Plan as and where appropriate to the operations on site.

The Visitor Management Plan is currently subject to the five yearly Site Wide Plan Reviews. MQS and the OEH have completed their reviews of the Plan with the next stage in the process being tabling of the Plan for discussion at the QSCC meeting on 15 February 2012.

### Objective Evidence

- Visitor Management Plan
- Site inspection

### Notes

Principal features of the Access Strategy were observed on site, including vehicle access limits, the shuttle bus system and provisions for disabled access.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.7.3

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***Have the co-proponents complied with the requirement to undertake a review of the Access Strategy every five years after the commencement date for the duration of the activity?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** See assertion for Question 10.7.2

### Objective Evidence

- Visitor Management Plan Review coversheet

### Notes

The Access Strategy is currently being reviewed as part of the five yearly review of the Visitor Management Plan.

### Recommendations – Ranking: N

There is no recommendation.

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**Question 10.7.4**

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***Have the co-proponents complied with the requirement to take all reasonable steps to ensure that for the first 3 years after the commencement date the optimum visitor capacity (or less) is met for a majority of the time during which the site is publicly accessible?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** NA

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has taken all reasonable steps to ensure that the maximum visitor capacity is met for a majority of the time.

**Objective Evidence**

- IMAMS Policy 2006 (Appendix C)
- Annual Monitoring Report 2010

**Notes**

This question is not applicable since 3 years have passed since the commencement date.

**Recommendations – Ranking:** NA

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**Question 10.7.5**

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***Have the co-proponents complied with the requirement that any proposal to increase the site capacity or the optimum visitor capacity after the first 3 years of the project must be publicly exhibited and submitted for the approval of the DEC and DIPNR?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** NA

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS have not submitted any proposal to increase the site capacity of the optimum visitor capacity at this time.

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**Objective Evidence**

**MQS:** Not required.

**Notes**

This question is not applicable because MQS have not submitted a proposal to increase site capacity or the optimum visitor capacity. The nature of operations at the site, which focus on overnight visitors and organised tours, mean that visitor numbers rarely approach the permitted limits.

**Recommendations – Ranking: NA**

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**Question 10.7.6**

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*Have the co-proponents complied with the requirement to provide suitable arrangements for providing managed access to the Second Cemetery, based on the options identified in the Heritage Landscape Master Plan, within 18 months of the commencement date?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Suitable arrangements for providing managed access to the Second Cemetery are in place and this is an item for further discussion as part of the current five yearly Site Wide Plans Review.

**Objective Evidence**

- Visitor Management Plan Review coversheet
- Heritage Landscape Management Plan
- Visitor Management Plan

**Notes**

The options identified in the HLMP for providing managed access to the second Cemetery were reviewed. From these options, the area has been blocked off with cooperation of NPWS to manage visitor access. Appendix I 'Minimal impact code for storytelling tour guides' of the Visitor Management Plan states that "to minimise the spread of Phytophora (die-back), apply a disinfectant to the shoes of tour customers entering the Second Cemetery". The Visitor Management Review is currently discussing these management options and their effectiveness.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.7**

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***Have the co-proponents complied with the requirement to limit the number of special events or activities requiring overflow parking to 6 per year?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS directs the Auditor's attention to the attached IMAMS Report (at Question 1.2). This position has been accepted by the OEH and is being considered as part of the current five yearly Site Wide Plan Reviews.

**Objective Evidence**

- IMAMS Bi-annual Report January-June 2011
- Visitor Management Plan Review coversheet

**Notes**

The IMAMS Bi-annual Report January-June 2011 was reviewed and found that the acceptable range of overflow parking between 2-6 times per annum was not reached. However, according to the Visitor Management Plan review, the "reception for accommodation/functions/tours etc has been relocated to top gate P26. Visitor Parking is now located in CP1 and public access to the site is by internal shuttle buses, controlling traffic flow and volume on site, and improving security. CP5 will be used for overflow car parking for staff and night guests at weddings and functions". This arrangement is expected to reduce the occurrence of overflow parking.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.8**

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***Have the co-proponents complied with the requirement to hold at least two free public open days every year?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

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### Management Assertion

**MQS:** MQS has complied with the requirement to hold two free public open days each year in the form of Community Open Days which are generally held in April and September of each year. The most recent Community Open Day was held over two days in September 2011, being 10 and 11 September 2011. The April 2012 Community Open Day is currently being planned.

### Objective Evidence

- Staff interviews

### Notes

Community Open Days are held in accordance with this requirement and are widely publicised in the Manly area.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.7.9

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*Have the co-proponents complied with the requirement to submit special event and public open day proposals to the DEC for approval?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** MQS works in collaboration with the OEH and their Environmental Manager for the site in planning and running special events and Community Open Days.

The planning and running of special events and Community Open Days is also an item for discussion (where relevant) in the monthly Lease Control Meetings between MQS and the OEH. In addition, noise monitoring is conducted regularly and trip switches operate to cut off audio systems if noise levels exceed the limit during events.

### Objective Evidence

- Lease Control Meeting Minutes

### Notes

Special events are organised in consultation with OEH. The Lease Control Meeting Minutes were sighted which provided evidence that 'new proposals' and 'special events' are fixed agenda items.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.10**

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*Have the co-proponents complied with the requirement that any special events or functions held after sunset are located away from areas identified in the DACMP or the revised habitat assessment as high-use Long-nosed Bandicoot foraging habitat?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, MQS complies with this condition. NB, there is no bandicoot foraging area at the Wharf Precinct.

**Objective Evidence**

- Staff interviews

**Notes**

Night functions are held indoors and site access arrangements including the use of shuttle buses minimise any impact on bandicoot foraging areas.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.11**

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*Have the co-proponents complied with the requirement that in the first three years after the commencement date, the maximum number of visitors on night tours shall not exceed 100 persons and 3 tour groups on the site at any one time?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

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**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has not exceeded the specified number of visitors or groups in night tours during the first three years after the commencement date and has not received any material notification to the contrary.

A proposal to increase visitor capacity for night tours is a matter for consideration between MQS and the OEH as part of the five yearly Site Wide Plan Review.

**Objective Evidence**

- IMAMS Bi-annual Report January-June 2011
- Visitor Management Plan Review coversheet

**Notes**

Appendix I 'Minimal impact code for storytelling tour guides' of the Visitor Management Plan states that "each tour has a predetermined group size that should never be exceeded, these are: 25 people for 40 Days; 20 people for The 6th Sense; 25 people for The Other Side tour; 25 people for the Ghost Boy Tour; 40 people for the Defiance. The 2007 audit reviewed the Guide Working Roster for the period 6/11/06 to 5/8/07 which indicated that the maximum number of groups on night tours at any one time was three, and that a group consisted of a maximum 30 people. The Visitor Management Plan review coversheet (as part of the 5 yearly site wide plan review) was sighted which states that "an ongoing review of need is underway to consider the justification for increasing the night tour capacities as per plan action requirement".

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.12**

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*Have the co-proponents complied with the requirement to ensure that night tours are to be undertaken on formed roads, paths or the Funicular stairway, unless part of an approved special interest tour?*

- Yes
- No
- Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** The Minimal Impact Code at Appendix H of the Visitor Management Plan states the following:

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*“Please use our roads and pathways to move about the site to protect our sensitive bushland, hidden Aboriginal middens and Bandicoots from disturbance.”*

The 2007 Auditor concluded that the above direction did not apply at night or to night tours.

It is the view of MQS that the above is an unambiguously clear direction intended to apply at all times. It does not create potential ambiguity by, for example, mentioning day usage of the site with the omission of a statement concerning night usage of the site. Furthermore, all night tours are guided and this obligation is complied with by guides.

#### Objective Evidence

- Visitor Management Plan (Appendix H)
- Staff interviews

#### Notes

Appendix H ‘Minimal impact code for visitors and guests’ of the Visitor Management Plan was reviewed which states “Please use our roads and pathways to move about the site to protect our sensitive bushland, hidden Aboriginal middens and Bandicoots from disturbance.” Staff indicated that all night tours are guided and conform to planned routes which comply with these requirements. Guides receive Staff Induction Training which emphasises the importance of the Minimal Impact Code.

#### Recommendations – Ranking: N

There is no recommendation.

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#### Question 10.7.13

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***Have the co-proponents complied with the requirement to take measures to ensure that night tour patrons do not use spotlights or flash photography in outdoor areas, unless approved as part of a special interest tour?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

#### Management Assertion

**MQS:** The requirement to take measures to ensure that night tour patrons do not use spotlights or flash photography in outdoor areas, unless approved as part of a special interest tour is addressed through the Minimal Impact Codes of the Visitor Management Plan.

Furthermore, all night tours are guided by guides who comply with this obligation.

In addition to the above, MQS has installed signs on site reminding patrons not to use spotlights and flash photography.

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### Objective Evidence

- Visitor Management Plan (Appendix I)
- Site inspection
- Staff interviews

### Notes

Minimal Impact Code signage was sighted around the site prohibiting the use of flash photography. Appendix I 'Minimal impact code for storytelling tour guides' of the Visitor Management Plan was reviewed which states that guides should "Request the group not to use flashes at night in outdoor areas beyond building cartilage" and "to not direct torchlight directly on the animal, and consider dimming other lights not immediately needed". Guides receive Staff Induction Training which emphasises the importance of the Minimal Impact Code.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.7.14

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***Have the co-proponents complied with the requirement to make arrangements to transport visitors in an orderly manner from the conclusion point of any night tour on site to all relevant destination areas?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

### Management Assertion

**MQS:** MQS operates a mini-bus to transport visitors from the conclusion point of tours to the relevant destinations listed in Condition of Approval 132.

### Objective Evidence

- Visitor Information (Q Station Loop Bus p.10)

### Notes

Signage exists around the site informing customers of the internal shuttle buses available for transport around the site. Visitor Information available in the hotel rooms was sighted and includes information about the Q Station Loop bus service (p.10). The shuttle bus arrangement was inspected as part of the site inspection and it was observed that the shuttle service is used on an as-needed basis; this includes transporting visitors at the conclusion of night tours to all relevant destinations.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.15**

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***Have the co-proponents complied with any directions issued by the DEC to reduce night tour numbers and/or implement other appropriate measures if the night tours are having adverse impacts on the Long-nosed Bandicoot population?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has not received any directions from the OEH to reduce night tour numbers or implement appropriate arrangements and MQS has not received any material notification that night tours have had any adverse impacts on the Long-Nosed Bandicoot population.

**Objective Evidence**

**MQS:** Not required.

**Notes**

This question is not applicable because OEH has not issued any directions to reduce night tour numbers.

**Recommendations – Ranking: NA**

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**Question 10.7.16**

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***Have the co-proponents complied with the requirement that no special interest tours may be run without the approval of the DEC?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS complies with the requirement that no special interest tours are run without the approval of the OEH. All tours operated are approved.

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**Objective Evidence**

- Staff interviews

**Notes**

All tour schedules and programs are approved by OEH, either through Lease Control Meetings or by correspondence. In practice, the established tour program meets most visitor requirements and special interest tours are not actively promoted or frequently conducted.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.17**

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*Have the co-proponents complied with the requirement to ensure that any approved special interest tours are subject to a specific monitoring and review program to enable assessment of potential visitor impacts?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** See assertion at Question 10.7.16

**Objective Evidence**

- Staff interviews

**Notes**

See Question 10.7.16.

**Recommendations – Ranking: NA**

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**Question 10.7.18**

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***Have the co-proponents complied with the requirement to ensure that daytime and overnight educational programs have a high-level of student supervision to prevent uncontrolled night activities or access across the site?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement                      Rating: 20                      Score: 20**

**Application:**    Operational Phase Only

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** MQS has complied with Condition of Approval 137 and has received no material notifications to the contrary.

**Objective Evidence**

- Q Station Sleepover Policy
- Staff interviews

**Notes**

The Q Station Sleepover Policy was reviewed which complies with all requirements in CoA 137.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.19**

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***Have the co-proponents complied with the requirement that the ferry service between Manly and the Quarantine Station site be limited to a maximum of 20 movements per day, and one movement per hour, after sunset, between July and February inclusive to reduce the potential for impacts on the Little Penguin population?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement                      Rating: 20                      Score: NA**

**Application:**    Operational Phase Only

**Responsibility:**                      MQS

**Management Assertion**

**MQS:** The ferry service is currently suspended. However, during the period in which it was in operation, MQS complied with Condition of Approval 138 and received no material

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notifications to the contrary.

### Objective Evidence

- Visitor Management Plan (Appendix B)

### Notes

The ferry service does not currently operate.

### Recommendations – Ranking: NA

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#### Question 10.7.20

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*Have the co-proponents complied with the requirement to undertake all practical measures to increase the proportion of visitors accessing the site by ferry?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

### Management Assertion

**MQS:** The ferry service is currently suspended. However, whilst it was in operation MQS took all practicable measures in attempting to meet the targets set by Condition of Approval 139.

Operational evidence to date has suggested that the targets set by Condition of Approval 139 are not feasible. As part of the five yearly review of the Site Wide Plans, MQS and the OEH are currently discussing alternate options of utilising the wharf for visitor arrivals.

In addition to the above, MQS continues to hold discussions between the relevant authorities and operators in an attempt to increase water access to the site.

### Objective Evidence

- Visitor Management Plan Review coversheet
- Visitor Management Plan (Appendix B)

### Notes

It is recognised that MQS has made significant efforts over the life of the project to encourage ferry services and other forms of water-based access to the site.

The ferry service does not currently operate. The Visitor Management Plan Review Coversheet was reviewed which states that “the Jenner will not be used as originally proposed, due to a failure to achieve necessary approvals and then vandalism leading to sinking”. MQS and OEH agree that the type of ferry service originally proposed is unlikely to be feasible.

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Alternative options for visitors to access the site by water have been discussed by MQS and OEH and documented in the Visitor Management Plan review coversheet. These options include possible use of the wharf as a 'public wharf' and encouraging water taxis and other ferry services to use the wharf. Discussions continue with ferry operators and government regarding the plan action to investigate the potential to expand water-based access beyond the ferry service.

**Recommendations – Ranking: I**

It is recommended that MQS and OEH continue to explore options to increase the proportion of visitors accessing the site by water.

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**Question 10.7.21**

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***Have the co-proponents complied with the requirement to ensure that use of the wharf facility takes into account potential impacts on seagrasses and Little Penguins?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** It is the view of MQS that it is compliant in this regard and that this question has already been sufficiently addressed by the following Questions: 10.5.17, 10.5.18, 10.5.19, 10.5.20, 10.5.21, 10.5.22, 10.5.23, 10.5.24, 10.6.1, 10.6.2, 10.6.3, 10.6.4, 10.6.5, 10.7.29, and 10.7.20.

**Objective Evidence**

- Site inspection
- Staff interviews

**Notes**

As the ferry service does not currently operate, use of the wharf is currently limited to water taxis and a small number of private and charter vessels. See also Question 10.6.1.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.22**

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***Have the co-proponents undertaken all practicable measures to ensure that within 5 years of the commencement date, the proportion of visitors accessing the site by private vehicle does not exceed 50% and stays at this level, or less for the life of the project?***

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Environmental Audit

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Practical measures have been taken, albeit without success, to meet the requirements of this Condition of Approval. MQS encourages clients, patrons etc to use public transport to access the site.

This matter is currently under consideration as part of the five yearly site wide plan review.

**Objective Evidence**

- Visitor Management Plan Review Coversheet
- Q Station website
- Visitor Information

**Notes**

MQS has made genuine efforts to promote use of public transport to the site with limited success. Overnight visitors, who bring luggage, have shown a strong preference for car travel. Public transport is more widely used by day visitors attending tours and special events.

Regular ferry access has not proved feasible, although charter boats and water taxis are sometimes used.

It was noted in the Visitor Management Plan Review that STA buses travel to the site boundary and a waiting area and facilities are provided. A bus stop at the site boundary was viewed during the site inspection to confirm this. The Visitor Management Plan Review Coversheet states that "Providing a link between the Q-Station website and the State Transit website to promote bus travel over private vehicle (as per plan action) has proved difficult to achieve". The Q Station website was reviewed which gave information about car travel and water access to the site but no mention of bus travel. The Visitor Information located in hotel rooms was sighted which provides public bus timetables and public ferry timetables.

MQS actively promotes the use of its shuttle buses to provide transfers to Manly ferries (see Question 10.7.25).

Consideration is also being given to increasing pedestrian and bicycle access to the site.

**Recommendations – Ranking: I**

It is recommended that continued efforts are made to facilitate and promote the use of public transport to the site though visitor information and to develop additional water transport options where feasible.

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**Question 10.7.23**

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***Have the co-proponents complied with the requirement to manage vehicle access in accordance with Conditions 144 to 150 of the Conditions of Planning Approval?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has complied with the above requirements of the Conditions of Approval 144 – 150 inclusive and continues to improve/adapt access for safety and environmental reasons where necessary.

**Objective Evidence**

- Visitor Management Plan (Appendix H, I)
- Site Inspection

**Notes**

Traffic management conditions in accordance with the CoA have been put in place.

Appendix H 'Minimal impact code for visitors and guests' of the Visitor Management Plan states "to keep the site quiet and almost 'car free' we'd like you to use the visitor shuttle and public transport instead of your car. If you do drive in and out of the site please stay below the speed limit of 15km/h, to help save our endangered bandicoots". Appendix I 'Minimal impact code for storytelling tour guides' states "when passing buildings where pedestrians may be present, drive close to walking speed and at dusk drive slower and pay extra attention to scanning road edges for browsing wildlife". During the site visit it was asserted that all vehicles on site follow the 15km/h speed limit and any outside vehicles needing access to the site undertake induction. The 15km/h signs were sighted during the site inspection. The entrance boom gate that can only be opened by staff or contractors was sighted.

In practice MQS has gone beyond the requirements of the approval in that since the construction of CP1 at the site entrance, vehicle access is normally limited to emergency and disabled access and staff and contractors who have received induction.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.24**

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***Have the co-proponents complied with the requirement to ensure that onsite car parking occurs in accordance with Conditions 151 to 153 of the Conditions of Planning Approval?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has ensured that onsite car parking occurs in accordance with Conditions of Approval 151 – 153 and continues to monitor and adapt same as and where necessary.

**Objective Evidence**

- Visitor Management Plan (Appendix H, I)
- Site Inspection

**Notes**

Onsite car parking is managed in accordance with CoA 151 – 153. See Question 10.7.23.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.25**

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***Have the co-proponents complied with the requirement to provide a shuttle bus service to transport visitors between the Manly Town Centre and the site?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** The shuttle-bus service operates on a schedule as well as on demand for visitors between the site and Manly Town Centre.

**Objective Evidence**

- Visitor management Plan (Appendix D)
-



**Notes**

Appendix D 'Visitor Shuttle details' of the Visitor Management Plan was reviewed which confirms the trip numbers as outlined in CoA 155 part c). Signage at the site displaying shuttle bus operation information for both internal and external to Manly was sighted which confirms that the co-proponents have complied with the requirement of providing a shuttle bus service to transport visitors between the Manly Town centre and the site.

**Recommendations – Ranking: I**

It is recommended that the shuttle bus service to Manly continue to be promoted to assist in reducing car traffic to the site.

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**Question 10.7.26**

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*Have the co-proponents complied with the requirement to establish a visitor monitoring program in accord with Policy AIP 3.2 in the DACMP and submitted for approval as part of the final Access Strategy?*

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** The visitor monitoring program has been established through the framework of the Visitor Management Plan and IMAMS.

**Objective Evidence**

- Visitor Management Plan (Table 1.2)
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011

**Notes**

Visitor monitoring information is shown in the IMAMS Bi-annual Report.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.7.27**

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***Have the co-proponents complied with the requirement to identify and implement appropriate management responses to any adverse impacts resulting from activities as identified by the visitor monitoring program?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** Any adverse impacts resulting from activities as identified by the visitor monitoring program will be identified in IMAMS reports, customer or public comments and, actioned by MQS and OEH senior management and will be specifically listed as items for action in the MQS/OEH monthly Lease Meetings.

**Objective Evidence**

- Visitor Management Plan
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Lease Control Meeting Minutes

**Notes**

The Lease Control Meeting Minutes were reviewed and found that visitor activities that could result in adverse impacts that have been identified through IMAMS are listed as agenda items. For example, OEH raised concerns over littering, speeding, and encroachments at A24. Visitor statistics and visitor response information have also been used to guide the review of the Visitor Management Plan.

**Recommendations – Ranking: N**

There is no recommendation.

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## 10.8 Noise Management

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### Question 10.8.1

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***Have the co-proponents prepared and implemented a noise management plan for the construction phase of the activity?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction Phase Only

**Responsibility:** MQS

#### Management Assertion

**MQS:** MQS has prepared and implemented a noise management plan which was approved by the (then) DEC as a part of the EMP on 13 July 2005.

#### Objective Evidence

- Noise Management Plan
- 2007 Audit Report

#### Notes

The 2007 Audit reviewed a letter to the DEC (dated 13/7/05) approving the Noise Management Plan. The Noise Management Plan was reviewed and found that it has been prepared for both construction and operational activities of the project. It incorporates all the requirements outlined in CoA 199.

#### Recommendation – Ranking: N

There is no recommendation.

---

### Question 10.8.2

---

***Have the co-proponents prepared and implemented a noise management plan for the operational phase of the activity?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase only

**Responsibility:** MQS

---

### Management Assertion

**MQS:** A Noise Management Plan is in place and implemented. IMAMS and other procedures are in place to monitor noise such as; trip switches in building P27, monitoring by tour guides at night as well as monitoring by the restaurant manager in the outdoor dining area. Furthermore, the staff who live on site regularly audibly monitor noise levels and report to management as and when needed.

### Objective Evidence

- Noise Management Plan
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011

### Notes

The 2007 Audit reviewed a letter to the DEC (dated 13/7/05) approving the Noise Management Plan. The Noise Management Plan was reviewed and found that it has been prepared for both construction and operation activities of the project. It incorporates all the requirements outlined in CoA 199.

### Recommendation – Ranking: N

There is no recommendation.

---

### Question 10.8.3

---

*Do the co-proponents comply with the requirements for ensuring that noise levels are managed and monitored in accordance with the noise management plan?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**MQS:** Noise levels are managed and recorded by noise management equipment and trip switches. The details of noise monitoring procedures undertaken by MQS on site are provided at Question 10.8.2.

### Objective Evidence

- Noise Management Plan
  - IMAMS Policy 2006
  - IMAMS Bi-annual Report January-June 2011
-

**Notes**

The IMAMS Policy and IMAMS reports were reviewed. IMAMS provides for monitoring of noise indicators and adaptive management responses. The 2007 audit reviewed a letter report from Wilkinson Murray, (dated 29/5/07), which provided details of construction noise monitoring conducted in May 2007. Noise levels recorded at the nearest sensitive receptors (residential areas across the bay) complied with the relevant guidelines.

Noise impacts during the operational phase are much lower than those during the construction phase. The absence of normal urban noise is one of the attractive features of a stay at the site. See also Question 10.8.2.

**Recommendation – Ranking: N**

There is no recommendation.

---

**Question 10.8.4**

---

***Do the co-proponents comply with the requirements for the management of amplified music or noise on the site?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase only

**Responsibility:** MQS

**Management Assertion**

**MQS:** See Questions 10.8.2 and 10.8.3.

**Objective Evidence**

- Noise Management Plan
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Site inspection

**Notes**

The Noise Management Plan was reviewed and found to incorporate the requirements of Condition 201. Activities conducted at the site involve minimal use of amplified sound. See Question 10.8.3.

**Recommendation – Ranking: N**

There is no recommendation.

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**Question 10.8.5**

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***Do the co-proponents comply with any direction to reduce or alter noise levels given by the DEC after considering monitoring information for the Long-nosed Bandicoot and Little Penguin populations?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** NA

**Application:** Construction Phase only

**Responsibility:** MQS

**Management Assertion**

**MQS:** MQS has not received any such direction.

**Objective Evidence**

**Notes**

No direction has been received from OEH, and therefore this question is not applicable for this audit.

**Recommendation – Ranking:** NA

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**Question 10.8.6**

---

***Do the co-proponents comply with the requirement that all construction activities, including entry and departure of heavy vehicles, be restricted to specified times?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** NA

**Application:** Construction Phase only

**Responsibility:** OEH and MQS are each responsible for their own construction activities

**Management Assertion**

**OEH:** This is the responsibility of MQS.

**MQS:** Yes, however, MQS notes that this question only relates to the construction phase.

**Objective Evidence**

- Infrastructure Control Plan.
-

**Notes**

This question is Not Applicable for this audit as no construction activities are currently being undertaken.

**Recommendation – Ranking: NA**

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**Question 10.8.7**

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***Do the co-proponents comply with the requirement that operational activities be restricted to specified times?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, MQS have achieved substantial compliance and no notification has been received to the contrary. MQS notes that the Lease mirrors this term in this regard, with the exception of exceptional circumstances as approved by the OEH.

**Objective Evidence**

- Liquor Licence
- Visitor Information
- Noise Management Plan

**Notes**

The Liquor Licence was reviewed which states, “the hours of trade during which liquor may be sold, supplied and consumed in the licensed premises shall be: Mondays to Sundays 7am – 11pm”. The Noise Management Plan incorporates the requirements of CoA 214 and 215. The site visit confirmed that operational activities are restricted to specified times.

**Recommendation – Ranking: N**

There is no recommendation.

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## 10.9 Management of Visual Impacts

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### Question 10.9.1

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*Have the co-proponents complied with the requirement to prepare a site-wide plan for outdoor visitor infrastructure prior to installation, which demonstrates consistency with other relevant site-wide plans?*

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Responsibility:** MQS

**Application:** Construction Phase only

#### Management Assertion

**MQS:** Yes, MQS have complied with this requirement.

MQS notes that this plan is currently under review as part of the five yearly Site Wide Plan Review.

#### Objective Evidence

- Infrastructure Control Plan

#### Notes

The Infrastructure Control Plan which includes the Outdoor Visitor Infrastructure Plan was reviewed and demonstrated that it has been prepared in accordance with Condition 112 (a) to (e). Table 1.3, p.23 of the Infrastructure Control Plan outlines the requirements of CoA 112 and how and where they are addressed within the Outdoor Visitor Infrastructure Plan.

The site inspection indicated that signage; lighting and waste bins have been designed and positioned in accordance with the Outdoor Visitor Infrastructure Plan so as to minimise light spill and meet fauna management requirements.

#### Recommendations – Ranking: N

There is no recommendation.

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### Question 10.9.2

---

*Have the co-proponents ensured that prior to the commencement of any installation works, a sample of the proposed lighting for general outdoor areas and emergencies has been completed in consultation with the Heritage Council and approved by the DEC?*

- Yes  
 No  
 Not Applicable
-



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**Category: Regulatory Requirement**

**Rating: 20**

**Score: NA**

**Application:** Construction Phase only

**Responsibility:** MQS

**Management Assertion**

**MQS:** All installed lighting is complete, compliant and approved.

MQS notes that this question applies to the construction phase only.

**Objective Evidence**

- Infrastructure Control Plan

**Notes**

This question relates to the construction process and is no longer applicable.

**Recommendations – Ranking: NA**

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**Question 10.9.3**

---

*Have the co-proponents complied with the requirement that the use of laser or neon lighting, food or beverage vending machines and commercial advertising signage on the site is not permitted?*

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, however a vending machine has been installed on site with the approval of OEH.

**Objective Evidence**

- Site inspection
- Staff interviews

**Notes**

There was no use of laser or neon lighting or commercial advertising signage on site.

With the approval of OEH, an unobtrusive food and beverage vending machine has been installed indoors in building A28 for the convenience of guests.

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**Recommendations – Ranking: N**

There is no recommendation.

---

**Question 10.9.4**

---

***Have all outdoor infrastructure works been undertaken in accordance with the adopted outdoor visitor infrastructure plan and an approved Precinct Plan?***

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Responsibility: MQS**

**Application: Construction Phase Only**

**Management Assertion**

**MQS:** Yes, MQS has complied with this Condition of Approval.

MQS notes that this question applies to the construction phase only.

**Objective Evidence**

- Infrastructure Control Plan (Outdoor Visitor Infrastructure Plan)

**Notes**

These works have been completed. See Question 10.9.1.

**Recommendations – Ranking: N**

There is no recommendation.

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## 10.10 Waste Management

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### Question 10.10.1

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*Have the co-proponents complied with the requirement to prepare a waste management plan as part of the EMP, to address the handling, stockpiling and disposal of wastes and construction materials during all phases of the activity?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

#### Management Assertion

**MQS:** Yes, MQS has complied with this requirement, the plan was approved as part of the EMP by the (then) DEC on 13 July 2005. The plan is monitored through IMAMS.

#### Objective Evidence

- Waste Management Plan
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011

#### Notes

A letter from the DEC (dated 13/7/05) approving the Waste Management Plan as part of the EMP was reviewed in the 2007 Audit. The Waste Management Plan was sighted and found to incorporate all the requirements of CoA 203. The IMAMS Policy was reviewed which monitors waste generation.

#### Recommendations – Ranking: N

There is no recommendation.

---

### Question 10.10.2

---

*Have the co-proponents complied with the requirement to undertake all handling, stockpiling and disposal of wastes and construction materials in accordance with the waste management plan?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

---

### Management Assertion

**MQS:** Yes, MQS complies with this condition. In addition, an active programme of waste reduction is underway.

### Objective Evidence

- Waste Management Plan
- Site inspection

### Notes

The site inspection demonstrated that waste management on site is being undertaken in accordance with the Waste Management Plan. The site is maintained free from litter and that good practice in waste handling is maintained including separation of recyclables and composting of kitchen waste.

The bins in the wharf precinct in between building A6 and A7 were sighted and found to be hidden from view so as to achieve an authentic interpretation of the cultural landscape.

The 2007 audit reviewed correspondence from Reefway Waste stating that they operate their services from EPA licensed and approved transfer and recycling stations (letter dated 23/11/06); and that they are specialists in construction waste management, that MQS has been accepted as a new customer, and that they have comprehensive Recycling and Environmental Procedures and Policies.

### Recommendations – Ranking: N

There is no recommendation.

---

### Question 10.10.3

---

***Has the co-proponent complied with the requirement to identify strategies to improve storm water management in the site wide Infrastructure Control Plan?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction Phase Only

**Responsibility:** MQS

### Management Assertion

**MQS:** Yes, MQS complies with this requirement. MQS notes that this question relates to the construction phase only.

### Objective Evidence

- Infrastructure Control Plan (Section 5)
  - Site inspection
-

**Notes**

Section 5 'Stormwater' of the Infrastructure Control Plan was sighted and outlines initiatives for upgrading stormwater management consistent with CoA 106g.

The site inspection, conducted during a period of heavy rain, indicated that the stormwater system is currently working effectively.

**Recommendations – Ranking: N**

There is no recommendation.

---

**Question 10.10.4**

---

*Have the co-proponents complied with the requirement to develop a monitoring program in the Infrastructure Control Plan to allow an on-going assessment of the consumption and capacity of the water supply and sewerage systems?*

- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, MQS have complied with this requirement.

**Objective Evidence**

- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Infrastructure Control Plan

**Notes**

Table A-2 of the IMAMS Policy was reviewed which includes water consumption and sewerage output in the monitoring schedule. This monitoring schedule includes triggers for system upgrades if monitoring results are found to be above the acceptable range, and it also refers to the Infrastructure Control Plan which includes proposed system upgrades.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.10.5**

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***Have the co-proponents complied with the requirement to include in the Infrastructure Control Plan an emergency strategy for utility infrastructure failures or malfunctions, to include sewerage system overloads and overflows, power failures and water supply?***

Please select only one response from the list below

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, MQS complies with this requirement that emergency strategies be in place.

**Objective Evidence**

- Infrastructure Control Plan

**Notes**

The Infrastructure Control Plan was reviewed and included an emergency strategy for utility infrastructure failures or malfunctions, including sewerage system overloads and overflows, power failures and water supply which are in accordance with CoA 106.

**Recommendations – Ranking: N**

There is no recommendation.

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## 10.11 Energy Management

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### Question 10.11.1

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***Do the co-proponents have an energy procurement, conservation and management policy?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

#### **Management Assertion**

**MQS:** Yes, MQS' policy in this regard is found in section 3.2 of the Sustainability Policy. Furthermore, MQS is engaged in ongoing discussions in relation to energy sustainability.

#### **Objective Evidence**

- MQS Sustainability Policy 2007 (Section 3.2)

#### **Notes**

A policy for the conservation of energy is included in the Sustainability Policy. Section 3.2 'Energy Conservation' of the Sustainability Policy was reviewed which includes strategies for minimising energy consumption on site.

#### **Recommendations – Ranking: N**

There is no recommendation.

---

### Question 10.11.2

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***Has a survey of total energy inputs and outputs been undertaken within the last two years that includes:***

- Conventional and alternative energy sources and types  
 Lighting management  
 Electric motors and machines  
 Transport fuels  
 Heating, air conditioning and ventilation of buildings  
 Ovens, kitchen appliances etc  
 Office and conference appliances  
 Management of fuel storages

**Category: Recommended/Professional Judgement**

**Rating: 12**

**Score: 0**

**Application:** Construction and Operational Phases

---

**Environmental Audit**

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, energy usage is surveyed and discussed in management meeting and reports.

**Objective Evidence**

- Mirvac National Greenhouse Reporting Scheme data form
- Property Inspection Report
- IMAMS Policy 2006

**Notes**

No baseline energy audit or survey has been undertaken.

**Recommendations – Ranking: I**

It is recommended that MQS consider undertaking an energy audit or baseline energy survey to identify current energy inputs and outputs as a basis for continual improvement.

---

**Question 10.11.3**

---

***Do the co-proponents have an energy monitoring program?***

- Yes  
 No

**Category:** Recommended

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, the energy monitoring program is to be found in IMAMS.

**Objective Evidence**

- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Property Inspection Report

**Notes**

Energy monitoring takes place through the IMAMS and is recorded on a quarterly basis. It is noted that this monitoring does not include transport fuels, which are a significant form of transport use.

**Recommendations – Ranking: I**

It is recommended that transport fuel use be included in energy monitoring reports.

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**Question 10.11.4**

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***Do the co-proponents maintain a process or procedure for periodic recording and reporting of energy data?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** See assertion for Question 10.11.3.

**Objective Evidence**

- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011

**Notes**

See Question 10.11.3. The results of the IMAMS including energy monitoring data are recorded in the IMAMS bi-annual reports.

**Recommendations – Ranking: N**

There is no recommendation.

---

**Question 10.11.5**

---

***Is the energy data obtained by the co-proponents analysed periodically to determine energy management and conservation opportunities including the procurement of renewable energy?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Management Assertion**

**MQS:** Energy usage is discussed in management meetings and opportunities for improvement are identified and implemented. MQS will be seeking approval from the OEH to construct a solar collection area adjacent to building P14.

**Objective Evidence**

- IMAMS Policy 2006
  - IMAMS Bi-annual Report January-June 2011
-

**Environmental Audit**

- Mirvac Corporate Responsibility and Sustainability Policy
- HSE Committee Minutes
- Staff interviews

**Notes**

Energy is recognised as a significant cost driver of the hotel operation. Energy management issues are discussed at HSE Management Committee meetings and a range of energy efficiency measures considered. Any measures which involve changes to the fabric of buildings or the appearance of the site are discussed with OEH at Lease Control meetings. A range of efficiency measures have been considered including the selection of vehicles to operate the shuttle bus service and solar hot water.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.11.6**

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*Do the co-proponents prepare and implement Energy Action Plans based on the analysis of its energy data with the aim of minimising impact on the environment?*

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 0**

**Application:** Construction and Operational Phase

**Responsibility:** MQS

**Management Assertion**

**MQS:** See assertion for Question 10.11.5.

**Objective Evidence**

- HSE Committee Minutes
- Staff interviews

**Notes**

While formal Energy Action Plans have not been developed for the site, a range of energy improvement actions have been considered and implemented. If the EMP is revised to provide for the development of Environmental Improvement Plans, energy management measures can be included in those plans, eliminating the need for separate Energy Action Plans.

**Recommendations – Ranking: I**

It is recommended that energy improvement actions be included in future Environmental Improvement Plans developed for the site.

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## 10.12 Procurement and Purchasing

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### Question 10.12.1

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***Do the co-proponents have a purchasing/procurement policy that establishes environmental requirements for the supply of goods and services?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS

#### **Management Assertion**

**OEH:** The NPWS must abide by the OEH Corporate Procurement Manual. All state government agencies including OEH have a waste reduction and purchasing policy (WRAPP) to reduce waste, increase recycling and purchase recycled content products. OEH must report on all products it purchases with recycled content including paper, office products, landscaping materials and construction materials, as well as products that have been recycled or recovered such as paper, office products, packaging, vegetation waste and construction and demolition waste. OEH also has a contract with Corporate Express, whereby common items ordered are automatically substituted to a recycled content alternative product. OEH also places clauses in standard contracts such e.g. Minor Works Contracts to reduce its environmental impact for that service. The reconstruction contract for the buildings P22 and H1 at the Quarantine Station contained a clause that no rainforest timbers were to be used in the reconstruction project. This is standard in OEH building contracts. The OEH Procurement Manual also requires the consideration of WRAPP principles in OEH Tenders.

**MQS:** MQS refers to the Mirvac Procedures Manual, Mirvac Procurement Policy, Mirvac Corporate Responsibility and Sustainability Policy as well as the MQS Sustainability Policy.

#### **Objective evidence**

- OEH Minor Works Contract (condition 56, 57, 58)
- OEH Procurement Manual
- Waste Reduction and Purchasing Policy – A guide for agencies
- Mirvac Corporate Responsibility and Sustainability Policy
- Mirvac Purchase Order Policy
- Mirvac Sustainability Requirements for Suppliers
- MQS Sustainability Policy 2007
- Waste Management Plan

#### **Notes**

OEH has a detailed departmental procurement policy which includes requirements for consideration of environmental requirements.

However, most purchasing associated with the site is undertaken by MQS and Mirvac.

The MQS Sustainability Policy does not include a clear statement on consideration of environmental requirements in purchasing, and it would be useful for this to be added.

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**Environmental Audit**

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Mirvac undertakes most purchasing for the hotel through its corporate preferred supplier system. Mirvac has documented corporate requirements for sustainable purchasing and requires potential suppliers to complete a detailed sustainability questionnaire which forms part of the selection process for preferred suppliers and products.

**Recommendations – Ranking: I**

It is recommended that the MQS Sustainability Policy be amended to include a requirement for consideration of environmental requirements in purchasing.

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**Question 10.12.2**

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***Do the co-proponents maintain procedures for the purchasing and procurement of goods and services to reduce the procurement or generation of waste?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** Refer to Question 10.12.1. OEH reports on its all products it purchases with recycled content including paper, office products, landscaping materials and construction materials as well as products that have been recycled or recovered such as paper, office products, packaging, vegetation waste and construction and demolition waste every 2 years. These procedures are also updated on the OEH intranet. As also noted for Question 10.12.1, the OEH Procurement Manual sets out procedures for the consideration of the waste reduction and purchasing policy (WRAPP) principles in OEH Tenders.

**MQS:** See assertion for the previous question.

**Objective evidence**

See Question 10.12.1

**Notes**

See Questions 10.12.1. For purchasing by Mirvac, this issue is addressed in Mirvac's Sustainability Requirements for Suppliers.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.12.3**

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***Do the co-proponents communicate in writing their purchasing/procurement policy and procedures to contractors?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** OEH communicate its purchasing/procurement policy and procedures to contractors by placing clauses in its contract. OEH has a Standard Minor Works Contract which contains set conditions relating to environmental/sustainability matters, for example environmental management, ecologically sustainable development and waste management. By way of example, the contract for the reconstruction of buildings P22 and H1 at the Quarantine Station contained a standard clause that no rainforest timbers were to be used in the reconstruction project.

**MQS:** Yes, policies and procedures are communicated in writing to contractors by MQS and Mirvac (as manager of the hotel) as part of all contracts with contractors and contractor induction.

**Objective evidence**

- OEH Minor Works Contract (condition 56, 57, 58)
- Contract Clause under Condition of Approval 65
- Mirvac Associate Handbook
- Mirvac Purchase Order Policy
- Mirvac Corporate Responsibility and Sustainability Policy

**Notes**

MQS does not have a documented policy on consideration of environmental requirements in purchasing. Inclusion of this requirement in the MQS Sustainability Policy would mean that it could be communicated to contractors as part of that policy.

For purchasing by Mirvac, this issue is addressed in Mirvac's Sustainability Requirements for Suppliers.

**Recommendations – Ranking: I**

See Recommendation 10.12.1.

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**Question 10.12.4**

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***Do the co-proponents communicate in writing their purchasing/procurement policy and procedures to all employees with purchasing authority?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** All OEH staff are notified of the purchasing/procurement policy and other procurement matters via the OEH intranet. For example staff can access 'Procurement Alert' which is a newsletter which provides an update on procurement news in respect to State Contracts. Alternatively; staff can subscribe to receive the alerts directly by completing the details on the [NSW Procurement website](#). Staff without email facilities, access these documents on office notice boards or are notified at staff meetings. Standard clauses are also found in procurement contracts used by OEH staff.

**MQS:** Staff induction and regular training ensure that the procurement policy is communicated to all employees. Furthermore, staff cannot make purchases outside of the procurement policy framework.

**Objective evidence**

- Mirvac Associate Handbook
- Mirvac Purchase Order Policy

**Notes**

See Question 10.12.3. Mirvac's policy of limiting purchasing to approved suppliers, provides an effective means of enforcing environmentally conscious purchasing decisions in the hotel operation.

**Recommendations – Ranking: I**

See Recommendation 10.12.1.

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**Question 10.12.5**

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***Do the co-proponents' purchasing/ procurement procedures provide for:***

- Purchasing of recycled products, materials, equipment and components where available
- Identification of preferred products to be purchased
- Removal of impediments to the purchase of preferred products
- Minimising or eliminating the purchase of waste (such as packaging) where possible
- The purchase of environmentally preferred items which are cost and performance competitive with the non-preferred equivalent
- The purchase of energy from renewable sources, where available

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** All state government agencies including OEH abide by the NSW Government Waste Reduction and Purchasing Policy (WRAPP) to reduce waste, increase recycling and purchase recycled content products. WRAPP also requires that priority be given to buying materials with recycled content where they are cost and performance competitive. OEH must report on all products it purchases with recycled content including paper, office products, landscaping materials and construction materials, as well as products that have been recycled or recovered such as paper, office products, packaging, vegetation waste and construction and demolition waste.

OEH also has a state government contract with Corporate Express where by common items ordered are automatically substituted to a recycled content alternative product.

The OEH has a [Parks Facilities Manual](#) (available on the OEH intranet) which addresses planning procedures to reduce environmental impacts when planning and designing works in National Parks. These include avoiding waste, using recycled content materials and the recovery and the reuse of materials.

OEH also places clauses in standard contracts such e.g. Minor Works Contracts to reduce its environmental impact for that service. By way of example, the reconstruction contract for the buildings P22 and H1 at the Quarantine Station contained a clause that no rainforest timbers were to be used in the reconstruction project.

**MQS:** MQS refers the Auditor to the assertions given in response to questions 10.12.1 to 10.12.4 inclusive. Furthermore, MQS refers the Auditor to the limitations imposed by the Lease and is always cognisant of environmental sustainability.

**Objective evidence**

See Question 10.12.1

**Notes**

See Question 10.12.1

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 10.12.6**

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***Do the co-proponents periodically review the effectiveness of its purchasing policy and procedures measured against the criteria established in Question 10.12.5?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH and MQS

**Management Assertion**

**OEH:** OEH reviews the effectiveness of its purchasing policy and procedures as part of the NSW Government Waste Reduction and Purchasing Policy (WRAPP). The WRAPP is reviewed by the OEH on an ongoing basis.

**MQS:** MQS discusses the effectiveness of the Mirvac procurement policy in management meetings.

**Objective evidence**

See Question 10.12.1

**Notes**

OEH and Mirvac purchasing policies and procedures are maintained and periodically reviewed by those organisations

Inclusion of a purchasing policy in the MQS Sustainability Policy will ensure that it is reviewed as part of periodic reviews of that Policy. See Question 1.2.

**Recommendations – Ranking: N**

See Question 1.2.

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**11.0 EMERGENCY PREPAREDNESS AND RESPONSE**

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**11.1 Emergency Response Procedures**

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**Question 11.1.1**

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***Have the co-proponents complied with the requirement to submit an emergency and evacuation plan for the site to the DEC for approval prior to the commencement date, and maintained this plan in force for the life of the project?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Responsibility:** MQS

**Application:** Construction and Operational Phases

**Management Assertion**

**MQS:** Yes, it is found in the approved Visitor Management Plan which is currently under review as part of the five yearly Site Wide Plans review.

**Objective Evidence**

- Visitor Information
- Visitor Management Plan (Section 7)

**Notes**

Section 7 'Emergency and Evacuation Plan' of the Visitor Management Plan was reviewed. The 2007 Audit sighted letters from the DEC (dated 13/7/05) and Heritage Office (dated 10/8/05) approving the Visitor Management Plan which includes the Emergency and Evacuation Plan. Appendix A of the Visitor Management Plan demonstrates how the requirements of CoA 205 are met. During the site visit it was noted that Emergency Procedures were located in a prominent position within the accommodation rooms. The visitor information booklet located in the rooms also had reference to the Emergency Plan and the procedures customers/visitors should follow in case of an emergency.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.2**

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***Does the documented emergency and evacuation plan for this site required by Condition of Planning Approval 205, include:***

- The definition of accidents and emergencies (4 points)  
 An inventory of potential accident and emergency situations including those listed in Condition 205(a) (4 points)
-

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- |                                     |  |            |
|-------------------------------------|--|------------|
| <input checked="" type="checkbox"/> | Documentation of the actions to prevent or mitigate the environmental impacts associated with potential accidents and emergency situations | (4 points) |
| <input checked="" type="checkbox"/> | Periodic reviews of emergency preparedness and response procedures   | (4 points) |
| <input checked="" type="checkbox"/> | Review of emergency preparedness and response procedures after the occurrence of an accident or emergency situation                        | (4 points) |
| <input checked="" type="checkbox"/> | Testing of the emergency preparedness and response procedures where practicable  | (4 points) |

**Category: Essential**

**Rating: 24**

**Score: 24**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, see the assertion for the previous question. Furthermore, MQS notes the General Manager's attendance at training for bushfire procedures at the State Emergency Centre, Homebush.

**Objective Evidence**

- Visitor Management Plan (Section 7)

**Notes**

Section 7 'Emergency and Evacuation Plan' of the Visitor Management Plan was reviewed, and it was verified that it met the required conditions listed in this question.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.3**

---

***Do the co-proponents comply with the requirement that all staff shall be made aware of the emergency and evacuation plan and its provisions and be trained in the operation of emergency equipment?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH only has two staff working permanently at the Quarantine Station site and both have undergone site induction training and undertake refresher training when required. Sian Waythe (substantive QS Environment Manager) and Lee De Gail (Ranger, North Head) are trained NPWS fire fighters and can operate the fire extinguishers and radios.

Other OEH staff that work on the site occasionally, have been trained in at least induction

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module 1 – Express Introduction, which covers emergency procedures. Many of these staff are also trained bushfire fighters for OEH.

**MQS:** All staff are made aware of the emergency and evacuation plan and receive appropriate training. Furthermore, some staff are appointed as fire/emergency wardens to implement the plan in an orderly fashion should the need arise.

**Objective evidence**

- Staff Induction Records
- EMP 2005
- Site inspection

**Notes**

Chapter 7 'Environmental Awareness and Training' of the EMP 2005 was reviewed. The 'Express Introduction' program covers OH&S, fire, emergency & evacuation which is undertaken by all staff, contractors and consultants. A sample of induction training records were sighted which confirmed they have undertaken emergency and evacuation training. The 2007 audit sighted NSW Fire Brigades Certificates for MQS staff. Emergency evacuation procedures, maps locating muster points and signage of muster points was observed on site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.4**

---

***Do the co-proponents comply with the requirement that the emergency and evacuation plan is displayed at prominent locations within the site?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, the emergency and evacuation plan is displayed in prominent locations, including in guest rooms. Emergency muster points are also clearly visible on site.

**Objective Evidence**

**MQS:**

- Visitor Information
  - Visitor Management Plan (Section 7)
  - Site inspection
-

**Notes**

See Question 11.1.1.

During the site visit it was noted that Emergency Procedures were located in a prominent position within the accommodation rooms. The visitor information booklet located in the rooms also had reference to the Emergency Plan and the procedures customers/visitors should follow in case of an emergency. Furthermore, maps locating muster points and signage of muster points was sighted in prominent locations on site.

**Recommendations – Ranking: N**

There is no recommendation.

---

**Question 11.1.5**

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***Have the co-proponents complied with the requirement to review the emergency and evacuation plan every five years after the commencement date for the duration of the activity or earlier if considered necessary by the DEC?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Operational Phase Only

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, the emergency plan (found in the Visitor Management Plan) is currently under review as part of the five yearly Site Wide Pan reviews.

**Objective Evidence**

- Visitor Management Plan Review Coversheet

**Notes**

The Visitor Management Plan which includes the Emergency and Evacuation Plan is currently under review as part of the 5 yearly site wide plans review.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.6**

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***Does the emergency and evacuation plan nominate personnel with specific responsibilities and duties for management of accident and emergency situations?***

- Yes  
 No

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** See assertion and evidence for Question 11.1.3. Specific staff members are nominated and trained for emergency procedures (such as acting as fire wardens).

**Objective Evidence**

- Todd Durrant Induction Records
- EMP 2005
- Visitor Management Plan (Section 7)

**Notes**

Section 7.3 'Policies for responses to emergencies' of the Visitor Management Plan states "the Q-Station General Manager, Operations Managers and senior management will have an overall collective responsibility for the implementation of emergency management procedures". This includes filling the position of Area/Building Warden and nominated first aid positions and maintaining a building Warden/first aider on each shift. Table 7.2 of the Visitor Management Plan was reviewed which outlines the positions, responsibilities and identification of nominated emergency personnel.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.7**

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***Have the co-proponents identified a contact person with the authority to take action required by the approving authorities in an emergency situation?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

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### Management Assertion

**OEH:** The Quarantine Station Environment Manager is the first contact for non-life threatening and property incidents and is either in person on site or on a mobile. The OEH also has a Duty Officer system where after hours and weekend emergencies are directed for follow up. Section 6.2 of the EMP contains contact numbers and protocols for a range of environmental and safety incidents. The 24 hour Duty Officer phone number is: 0418 462 497.

**MQS:** Yes, the following people have authority to take action in an emergency situation at any time. The General Manager (currently Zac Hope), security and duty staff are on site at all times. Senior MQS Management are available by phone at any time in an emergency situation.

### Objective evidence:

- EMP 2005 (Chapter 6.2)
- Todd Durrant CV

### Notes

Table 6.2 'Environmental Incident Response Protocol' of the EMP outlines the immediate response and contact details of different issues that could occur on site. The Site Manager has been identified as the contact person with the authority to take action required by the approving authorities in an emergency situation. Todd Durrant is the current Site Manager who also lives on site and is therefore appropriately located to undertake this role.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 11.1.8

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***Do emergency preparedness and response procedures include emergency teams that have:***

- Adequate numbers of personnel?
- Resources to respond to identified accident and emergency situations
- Adequate training that includes hands-on drills and refresher training

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

### Management Assertion

**OEH:** In addition to MQS personnel, OEH have two staff members on site who have the authority and capacity to manage environmental emergencies on site. OEH is aware that MQS operate a warden system for emergency management. The current arrangements arising from the EMP and Visitor Management Plan also cover emergency response procedures. The first steps required to manage and report an environmental emergency (refer to EMP Section 6.2) could be undertaken by any person on site. Also refer to EMP safeguards provided in response to spill management questions (11.2) covering the need for

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trained personnel to respond to spills and other type of emergencies.

**MQS:** See assertions for Question 11.1.1 to 11.1.7 inclusive.

**Objective evidence**

- EMP 2005
- Visitor Management Plan

**Notes**

The emergency arrangements set out in the Visitor Management Plan and implemented on site meet these requirements. See also Question 11.1.1 to 11.1.7.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.9**

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***Do emergency preparedness and response procedures include:***

- Mutual aid agreements with emergency response agencies
- Communications procedures with emergency response agencies
- Arrangements to obtain other emergency equipment such as pumps, vacuum tankers, spill cleanup absorbents, etc.
- Regular review of procedures and contact details

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The emergency response procedures manual and Module 5 of the induction program detail procedures for managing spills and other environmental incidents which include contact details of relevant authorities. Mutual Aid Agreements are not considered necessary for the nature and scale of the operation. Emergency response services are located within five minutes drive of the site. Emergency response agencies are listed in the Environmental Management Plan – Section 6.2. The induction program details internal and external communication procedures, including with fire brigade, police, water police, rural fire service, and ambulance. It is the responsibility of MQS to regularly review the procedures as part of the Induction Program and precinct-based emergency response procedures manuals.

**MQS:** MQS concurs with the above and furthermore, MQS notes that it has an excellent working relationship with relevant authorities, such as the Fire Brigade etc.

**Objective evidence**

- EMP 2005 (Chapter 6.1 & 6.2)
  - Visitor Information
  - Visitor Management Plan (Section 7)
  - Staff interviews
-

## Notes

Section 6.1 of the EMP provides the contact details of personnel responsible for different issues on site. Section 6.2 of the EMP provides immediate response details for different issues as well as the contact details of emergency response agencies and staff. Section 7 of the Visitor Management Plan outlines emergency agencies role and responsibility in relation to different emergencies. Contact details in documentation and signage are current. Staff indicated that there has been liaison with local emergency services.

## Recommendations – Ranking: N

There is no recommendation.

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### Question 11.1.10

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#### *Do emergency preparedness and response procedures include notification of:*

- Internal Management
- Local, Regional and National Emergency Response Authorities (as applicable)
- Regulatory Agencies
- The Media
- The Public

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### **Management Assertion**

**OEH:** The Emergency and Evacuation Plan and Module 5 of the Induction Program details procedures for notifying internal management, relevant emergency response authorities, and regulatory authorities. The Emergency and Evacuation Plan details the procedures for notifying the public (through the Emergency Control Organisation) and coordinating media coverage. Also see EMP Section 6.2. OEH protocol is that all media contact is handled through the OEH Public Affairs Unit. They will then advise who will speak to the media on behalf of OEH or the Minister

**MQS:** MQS procedures include notification of the above as applicable and in concert with the OEH.

#### **Objective evidence**

- EMP 2005 (Chapter 6.2)
- Visitor Management Plan (Section 7)

## Notes

The Emergency and Evacuation Plan includes notification protocols for those parties listed. Section 6.2 of the EMP also contact protocols for those parties listed.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.11**

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***Are regulatory authorities notified in the event of an accident or emergency situation in accordance with regulatory requirements?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Yes, the procedures identify the need to notify regulatory authorities, see EMP Section 6.2 and Incident Reporting Form.

**MQS:** MQS relies upon the assertions given in response to Question 6.9.

**Objective evidence:**

- EMP 2005 (Chapter 6.2)
- General Incident Reporting Form
- Visitor Management Plan (Section 7)

**Notes**

The requirement to notify regulatory authorities in the event of an accident or emergency situation in accordance with regulatory requirements have been outlined in Chapter 6.2 of the EMP as well as included in the Emergency and Evacuation Plan. The General Incident Reporting Form was also reviewed which includes sections stating “date relevant agencies informed (e.g. DEC, Maritime Services, Heritage Office)”.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.12**

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***Has a person been designated in writing as spokesperson in the event of an environmental accident or emergency situation?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

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**Application:** Construction and Operational Phases

**Responsibility:** Joint. OEH and MQS may both have designated spokespersons.

**Management Assertion**

**OEH:** OEH protocol is that all media responses or releases are handled through the OEH Public Affairs Unit. They will then advise who will speak to the media on behalf of OEH or the Minister.

**MQS:** MQS relies upon the assertions given in response to Question 6.9.

**Objective Evidence**

- Lease

**Notes**

See Question 6.9.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.13**

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*Have all persons working for or on behalf of the co-proponents been made aware of the name of the designated spokesperson, in the event of an environmental accident or emergency situation?*

- Yes  
 No  
 Not Applicable

**Category:** Desirable

**Rating:** 5

**Score:** 5

**Application:** Construction and Operational Phases

**Responsibility:** Joint. OEH and MQS may both have designated spokespersons.

**Management Assertion**

**OEH:** Yes. As stated in the OEH management assertion for Question 11.1.12, it is standard practice for the OEH's Public Affairs Unit to designate an appropriate spokesperson, in the event of an environmental accident or emergency situation.

**MQS:** Yes, this requirement is addressed in staff induction.

**Objective Evidence**

- Induction Program
-

**Notes**

This requirement is addressed in staff induction.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.14**

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***Do emergency response procedures address issues specific to the (a) the operations at this site and (b) transport and other off-site emergencies for which the organisation may be legally or morally responsible?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** Yes, MQS complies with this requirement.

**Objective Evidence**

- Mirvac Emergency Response Procedure
- Visitor Management Plan

**Notes**

The emergency response procedures cover transport to and from the site when arranged or operated by the site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.15**

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***Do the co-proponents comply with the requirements of the Conditions of Planning Approval for fire safety management on the site?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

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**Responsibility:** OEH and MQS in relation to buildings for which they are responsible

**Management Assertion**

**OEH:** OEH was responsible for the construction of H1 and P22 only. Fire compliance certificates were prepared.

The assessment of fire safety measures is a critical component of NPWS' construction assessment procedures. MQS was required to demonstrate at the design and construction completion stages that adequate fire safety measures are in place for all occupied buildings.

**MQS:** All construction and building works done by MQS are BCA compliant and have been given final certificates.

**Objective evidence**

- Works Certificate Application Building P1 – Accommodation Block
- Compliance Rectification Requirement RE: inoperable fire hydrants

**Notes**

Fire safety compliance was addressed in design and construction certification of all building works.

The BCA assessment report for Building P1 – Accommodation Block was reviewed. The 2007 Audit reviewed evidence of compliance with 'Intention to issue a fire order' passed on to MQS from OEH in March 2007. The 2007 Audit sighted fire safety schedules for Buildings S1 and A2; Interim Occupation Certificates including fire safety schedules for the remainder of buildings currently used on site and under the management of MQS; An "Agreement for Inspection and Testing of Fire Protection Systems with MQS Quarantine Station P/L and North Head Quarantine Station, Manly", (dated 17/10/06), from Aquafire Protection.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.1.16**

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***Do the co-proponents comply with the requirement that timber buildings shall not be used for the storage of fuel or other flammable materials?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** MQS

**Management Assertion**

**MQS:** This requirement is satisfied by staff induction procedures as well as Mirvac Procedures.

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### Objective Evidence

- Mirvac Dangerous Goods Storage Guidelines
- Visitor Management Plan (Section 7.3)
- Mirvac Associate Handbook
- Mirvac Hazardous Substances and Dangerous Goods Management Procedure
- Mirvac Spill Management Procedure

### Notes

Table 10.11.1 'Fire Management' of the EMP states "timber buildings shall not be used for the storage of fuel or other flammable materials" as an environmental strategy.

The Mirvac Hazardous Substances and Dangerous Goods Management Procedure states that "hazardous substances and dangerous goods are stored in secure well ventilated areas".

Dedicated storage facilities used for storage of flammable materials are appropriately located in brick buildings. Stocks of flammable substances such as some cleaning products which are used in timber buildings, are stored only in dedicated storage facilities.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 11.1.17

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***Do the co-proponents comply with the requirement to liaise with the DEC and any other relevant authorities to ensure that the provisions of any adopted bushfire management plans applicable to the site are implemented?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

### Management Assertion

**OEH:** OEH has prepared and adopted a North Head Precinct Fire Management Strategy which covers the Quarantine Station. Drafting the Strategy involved liaison with landholders and other stakeholders and as a result it incorporates the interests of local landholders including Sydney Water, the Sydney Harbour Federation Trust, Australian Institute of Police Management, North Fort and Lend Lease as well as the NSW Fire Brigades and the OEH.

**MQS:** MQS concurs with the OEH above. In addition, MQS notes that it has taken part in emergency fire drills in conjunction with the OEH.

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**Objective evidence**

- North Head Precinct Fire Management Strategy
- North Head Bushfire Management Strategy Approval

**Notes**

The North Head Precinct Fire Management Strategy was sighted which has been prepared by OEH and covers the Quarantine Station area. CoA 212 has been complied with.

**Recommendations – Ranking: N**

There is no recommendation.

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## 11.2 Spill Prevention and Control

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### Question 11.2.1

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***Have potential environmental hazards for hazardous substances and/or dangerous goods been assessed and documented?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### **Management Assertion**

**OEH:** Environmental hazards associated with the use of fuels and other chemicals was assessed in the EMP (see section 6.2, 10.6, 10.8.2 and 10.11.1). In March 2007, the OEH Quarantine Station Environment Team undertook a site inspection of MQS' chemical storage. Some problems were identified with the storage of paints, fuels and oils and the rectification of these problems the subject of compliance rectification requirement (07/004). OEH understand that following the site inspection, MQS engaged WorkCover NSW to advise them on the proper management of dangerous goods. MQS have also implemented OEH's recommendations arising from 07/004.

**MQS:** MQS concurs with the OEH above and notes that procedures are in place though the development and implementation of the induction program.

#### **Objective evidence**

- EMP 2005 (Section 6.2, 10.6, 10.8.2, 10.11.1)
- Mirvac Hazardous Substances and Dangerous Goods Management Procedure
- Mirvac Spill Management Procedure
- Mirvac Dangerous Goods Storage Guidelines

#### **Notes**

Section 6.2 'Environmental Incident Response Protocol' of the EMP has identified pollution incidents such as spills, sewerage overflows, etc as environmental incidents and provides 'immediate' and 'as soon as practical' responses to these. Table 10.6 'Water Quality & Hydrological Regimes' of the EMP has documented potential environmental impacts such as "deterioration in the quality of stormwater or groundwater from the site, due to chemical spills and leaks, illegal discharges, waste dumping or sewerage overflow" and has listed environmental strategies to manage these potential impacts such as handling and storage restrictions, and spill kit availability. Table 10.8.2 'Soil Contamination' of the EMP identifies the exposure of contaminated soil, as a health risk to humans and the environment. Table 10.11.1 'fire management' of the EMP includes the strategy of appropriate storage of hazardous substances. The 2007 audit sighted the compliance rectification requirement issued by DECC to MQS (07/004) along with following audit records and correspondence which indicated that the requirement was appropriately responded to.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.2.2**

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***Has a survey or risk assessment been carried out to identify potential spill situations, that includes:***

- On site Spills  
 Off site Spills (including products and wastes transported off site)

**Category: Essential                      Rating: 20                      Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:**                      Joint

**Management Assertion**

**OEH:** Whilst not subject to a formal risk assessment to date, the risk of spills or overflows from the operation have been identified and generic safeguards developed through the EMP (see section 6.2, 10.6 and 10.8.2).

The Quarantine Station sewage management was independently audited in 2010 as part of a DECCW (now OEH) wide audit of sewage management facilities. Section 9 of the report relates to the Quarantine Station site and makes a series of recommendations. The OEH prepared a response to the audit findings and notes that each of the auditor's recommendations is now complete.

**MQS:** MQS concurs with the OEH above and relies upon the assertions and evidence provided for Question 11.2.1

**Objective evidence**

- EMP 2005 (Section 6.2, 10.6, 10.82)
- DECCW Audit of Sewage Management Facilities Report
- OEH response to sewage audit findings

**Notes**

Section 6.2, table 10.6 and table 10.8.2 of the EMP have identified potential spill situations and environmental strategies and responses to manage them. These tables mention risks relating to both the construction and operational phases.

Risks relating to stormwater and sewage discharges have been considered in some depth. Table 10.6 note the requirement for monitoring water quality at stormwater discharge point at Quarantine Beach. The DECCW Audit report of Sewage Management Facilities (dated July 2010) was sighted which contained a detailed report on Quarantine Station's sewage management as well as recommendations. OEH's response to these recommendations and their completion was sighted.

There does not appear to have been any specific analysis of other possible spills during the operational phase including fuel spills from vehicles or spills of waste during collection processes. The likelihood of these spills is low, and no fuel is stored on site. However, a spill

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could result in environmental damage, and appropriate contingency arrangements should be in place.

### Recommendations – Ranking: I

It is recommended that a risk assessment be undertaken for possible spills of pollutants including fuel spills from vehicles or spills of waste during collection processes, and that recommended control measures be included in operational and emergency procedures.

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### Question 11.2.3

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***Have Spill Prevention and Control Procedures (or a Spill Contingency Plan) been documented for this site appropriate to the potential hazards and risks identified that include:***

- A chain of command that designates positions and responsibilities
- Regulatory requirements for spill response actions
- Notification of internal management
- Notification of external authorities in accordance with regulatory requirements
- Operational actions to be taken immediately a spill is observed or detected to control the spill at source
- Operational actions to be taken to recover spilt materials
- Operational actions to be taken to remedy a site contaminated by the spill
- Review of the spill situation including the effectiveness of the actions taken
- A review of the procedures where required changes have been identified through the review process

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

### Management Assertion

**OEH:** See response to Question 11.2.2. Section 6.2 (Environmental Incidents) of the EMP covers these matters.

**MQS:** MQS concurs with the above and the above and further compliance has been achieved through the adoption of the relevant Mirvac Policies

### Objective evidence

- EMP 2005 (Section 6.2, 10.6, 10.82)
- Mirvac Hazardous Substances and Dangerous Goods Management Procedure
- Mirvac Spill Management Procedure
- Mirvac Dangerous Goods Storage Guidelines

### Notes

Section 6.2 'Environmental Incident Response Protocol' of the EMP has identified pollution incidents such as spills, sewerage overflows, etc as environmental incidents and provides 'immediate' and 'as soon as practical' responses to these. Contacting the appropriate emergency authority is the 'immediate response' and contacting the site manager is the 'as soon as practical response'. Section 10.6 and 10.8.2 of the EMP has identified various

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environmental strategies for the management of and responding to spill incidents.

Section 7 'Emergency and Evacuation Plan' of the Visitor Management Plan is also relevant to spill situation.

Mirvac has spill management procedures, Dangerous Goods Storage Guidelines and Hazardous Substances and Dangerous Goods Management Procedures that fulfil the requirements of the question, however these procedures cover Mirvac's operations generally and not specific to the Quarantine Station.

**Recommendations – Ranking: I**

See Recommendation 11.2.2.

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**Question 11.2.4**

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***Are spill clean up teams available at this site that have:***

- Adequate numbers of personnel?
- Resources to respond to identified spill situations
- Adequate training that includes hands-on drills and refresher training

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Spill kits and staff trained in their use are the responsibility of MQS under safeguards SG24 and WH6, Sections 10.8.2 and 10.6 of the EMP.

**MQS:** MQS concurs with the OEH above. Furthermore, it is MQS policy to consult and refer matters where necessary to the appropriate emergency agency. However, Mirvac policies and training do allow for the identification of risks and immediate response before emergency authorities take over.

**Objective evidence**

- EMP 2005 (Section 6.2, 10.8.2 and 10.6)
- Site Inspection

**Notes**

Section 10.6 and 10.8.2 of the EMP identifies various environmental strategies for responding to spill incidents such as spill kit availability and training staff in procedure. All staff, contractors, and consultants undertake the site induction program which includes emergency training. Spill kits are appropriately located across the site and are maintained.

The risk assessment proposed in Recommendation 11.2.2 should address whether additional staff training in spill responses is required.

**Recommendations – Ranking: I**

See Recommendation 11.2.2.

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**Question 11.2.5**

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***Do the Spill Prevention and Control Procedures (or Spill Contingency Plan) identify sensitive environments that could be affected by a spill and the special precautions and procedures required to protect those environments, including the protection of flora and fauna?***

- Yes  
 No

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Yes, waterways and drains are identified in environmental safeguard WH5, Section 10.6 of the EMP.

**MQS:** MQS concurs with the OEH above and relies upon the assertions given for Questions 11.2.1 to 11.2.4.

**Objective evidence**

- EMP 2005 (Section 6.2, 10.6, 10.82, 10.11.1)
- Mirvac Hazardous Substances and Dangerous Goods Management Procedure
- Mirvac Spill Management Procedure
- Mirvac Dangerous Goods Storage Guidelines

**OEH:** Environmental safeguard WH5, Section 10.6 of the EMP.

**Notes**

Section 10.6 of the EMP safeguard 'WH5' identifies watercourses and drains as sensitive areas where fuels and chemicals must not be stored or handled.

The risk assessment proposed in Recommendation 11.2.2 should address whether special precautions are needed to protect against spills in sensitive locations. This issue was referred to in the 2007 Audit.

**Recommendations – Ranking: I**

See Recommendation 11.2.2

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### 11.3 Environmental Incident and Accident Reporting

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#### Question 11.3.1

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***Are there written procedures to respond to and investigate environmental incidents and accidents?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### **Management Assertion**

**OEH:** Written procedures to respond to and investigate environmental incidents and accidents are located in Section 6.2 of the Environment Management Plan. The procedures for responding to and investigating environmental incidents are found in the Induction Program Module 5 Emergency and Accident Management. The Module also includes definitions of emergency, accident, incident, and near misses. An incident register has been implemented to record general incidents on site, including environmental incidents. Review of the incident register is a fixed agenda item at the monthly OEH/QMS Lease Control Meetings.

**MQS:** MQS concurs with the OEH above.

#### **Objective evidence**

- EMP 2005 (Section 6.2)
- General Incident Reporting Form
- Significant Incident Reporting Form
- Incident Register
- Lease Control Meeting Minutes
- Module 5 of Induction Program

#### **Notes**

Section 6.2 'Environmental Incidents' of the EMP states that "all environmental incidents shall be responded to, recorded and investigated in accordance with the material presented in Table 6.2". Table 6.2 'Environmental Incident Response Protocol' of the EMP identifies environmental incidents and provides for 'immediate' and 'as soon as practical' responses to these. Contacting the appropriate emergency authority is the 'immediate response' and contacting the site manager; recording incident and debrief with reference to the incident report form and commence site rehabilitation is the 'as soon as practical response'.

A General Incident Reporting Form and Significant Incident Reporting Form were sighted and are available to record details of an incident including personnel details completing the form, details of the incident (time, date, location, person involved), nature of the incident (e.g. fire, hazardous materials spill, injuries/death to wildlife etc) and details of the incident. The General Incident Form does not have a prompt for investigation however the Significant Incident Form has a section called 'management response to significant incident' where proposed response actions are documented.

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Incident records are paper-based using a folder in the Mirvac administrative office. This is appropriate given the small number of incidents which occur.

The Lease Control Meeting minutes were sighted which confirmed that Incident Register Review is a fixed agenda item at these meetings.

Module 5 'Emergency and Incident Management' of the Q-Station induction program was reviewed. It includes procedures to follow when responding to an accident/incident or emergency and definitions of a near miss, accident, incident, and emergency. Table 1 and 2 also include who should be contacted in which situation.

The 2007 Audit recommended that all incident reporting forms should include a prompt for management to assess whether an investigation of the incident is necessary, and it is agreed that this would be a worthwhile improvement in the system.

**Recommendations – Ranking: I**

It is recommended that all incident reporting forms include a prompt for management to assess whether an investigation of the incident is necessary.

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**Question 11.3.2**

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***Do the written procedures provide for reporting environmental incidents, accidents and near misses?***

- Incidents
- Accidents
- Near misses
- Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The procedures for reporting environmental incidents, accidents and near misses are located in Section 6.2 of the Environmental Management Plan. These procedures identify the type of incident, immediate response, actions to be taken, and references and resources. Procedures for reporting environmental incidents, including definitions of accidents, incidents, emergencies and near misses are located in the Induction program Module 5. Definitions of and procedures for addressing internal and external complaints are addressed in the Induction Program, Module 2a.

**MQS:** MQS concurs with the OEH above. Furthermore, any incidents, accidents or near misses that may occur are dealt with in Mirvac reports to MQS senior management as and when appropriate.

**Objective evidence**

- EMP 2005 (Section 6.2)
  - General Incident Reporting Form
  - Significant Incident Reporting Form
-

**Notes**

The incident reporting forms and training in incident reporting make clear that the incident reporting process applies to incidents, accidents and near misses.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.3.3**

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***Do the written procedures provide for time frames within which actions must be taken in response to an environmental incident or accident?***

- Yes  
 No  
 Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Module 5 of the Induction Program gives timeframes within which actions must be taken in response to an environmental incident and accident. The Environment Management Plan Chapter 6.2 provides time frames within which actions must be taken in response to an environmental incident and accident. These time frames are broken down into 'immediate' and 'as soon as practical'.

**MQS:** MQS complies with this requirement through its induction programs.

**Objective evidence**

- EMP 2005 (Section 6.2)
- General Incident Reporting Form
- Significant Incident Reporting Form

**Notes**

Section 6.2 'Environmental Incident Response Protocol' of the EMP identifies environmental incidents and provides for 'immediate' and 'as soon as practical' responses. The Significant Incident Reporting Form includes a section called 'management response to significant incident' which documents proposed response actions, the 'date forecast to be complete' and 'date actually completed'.

It is considered that given the small number of incidents which occur and the active oversight exercised through Lease Control Meetings, a more precise definition of timeframes is unnecessary.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.3.4**

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***Do the written procedures provide for reporting to internal management at levels appropriate to the severity of the environmental incident or accident?***

- Yes  
 No  
 Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The environmental incident and accident reporting procedures outlined in Module 5 of the induction program provide instructions for reporting incidents to internal management. All incidents are to be reported to the manager on duty. Procedures for reporting specific incidents internally are included in table 1 and 2. This requirement is reflected in the Incident Reporting Form. The Environmental Management Plan also outlines the reporting mechanisms to report environmental incident or accident depending on its severity.

**MQS:** Yes, these matters are dealt with as and when appropriate in the monthly reports from Mirvac to MQS senior management.

**Objective evidence**

- EMP 2005 (Section 6.2)
- General Incident Reporting Form
- Significant Incident Reporting Form
- Module 5 of Induction Program

**Notes**

The general incident reporting form has sections labelled 'time and date supervisor was informed', 'time and date General Manager was informed', and 'date relevant agencies informed'.

Section 6.2 'Environmental Incident Response Protocol' of the EMP identifies those personnel of internal management that should be notified of particular incidents. It appears that the reporting of incidents to internal management is the same regardless of the severity of the incident. This is appropriate given the small number of incidents at the site.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.3.5**

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***Do the written procedures provide for environmental incidents and accidents to be reported to regulatory authorities?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH has written procedures for reporting environmental incidents and accidents to regulatory authorities which are found in Section 6.2 of the Environmental Management Plan. OEH has developed a Compliance Rectification Process to clearly establish a way of dealing with non-compliances including those arising from environmental incidents and accidents. This process allows for the escalation of the incident and notification of regulatory authorities. In addition, the Environmental Manager, as outlined in Condition of Approval 53, has the authority to immediately advise the MQS, OEH, Department of Planning and Infrastructure, the Heritage Office and/or the Maritime (depending on the issue involved) of any major issues resulting from the undertaking of the activity that have not been dealt with expediently or adequately by the co-proponents.

**MQS:** Yes, MQS relies upon the assertions given in response to Questions 11.1.11, 11.1.12 and Question 11.2.

**Objective evidence**

- EMP 2005 (Section 6.2)
- General Incident Reporting Form
- Significant Incident Reporting Form
- Compliance Rectification process

**Notes**

Section 6.2 'Environmental Incident Response Protocol' of the EMP identifies those relevant regulatory authorities and agencies to be notified either immediately or as soon as practical following an environmental incident. The general incident reporting form also has a section called 'date relevant agencies informed (e.g. DEC, Maritime Services, Heritage Office)'.

Furthermore, the OEHs 'Protocol for the management of activities that are potentially non-compliant with the Quarantine Station lease, Conditions of Approval or other Legislative Obligations' also provides for the notification of environmental incidents to regulatory authorities where required.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.3.6**

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***Do the written procedures provide for voluntary notification (where appropriate) to local, regional and national authorities, regulatory agencies and the public?***

- Yes  
 No  
 Not Applicable

**Category: Desirable**

**Rating: 5**

**Score: 5**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** See response to Question 11.3.5. The OEH has written procedures for reporting environmental incidents and accidents to authorities as set out in Section 6.2 of the Environmental Management Plan. The Environment Manager is to be notified in the event of such incidents and may provide voluntary notification where they believe appropriate to local, regional and national authorities, regulatory agencies, neighbours, the QSCC and the public. Bandicoot road deaths are reported publicly through the sign at Park Hill Arch. Incidents are reported formally through the Annual Sustainability Report. Incidents may, if considered appropriate be reported at QSCC, recovery team and North Head Stakeholder Group meetings.

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- EMP 2005 (Section 6.2)

**Notes**

Section 6.2 'Environmental Incident Response Protocol' of the EMP does not specifically provide for voluntary notification of local, regional and national authorities, regulatory agencies and the public. Some environmental incidents are routinely made public such as bandicoot mortality rate which is documented on a sign at Park Hill Arch. In other cases, notification is at the discretion of the Environmental Manager.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.3.7**

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***Do the written procedures require the reporting of incidents and accidents relating to the activities and operations of the co-proponents?***

- Yes  
 No  
 Not Applicable

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** See response to Question 11.3.5 and 11.3.6

**MQS:** MQS concurs with the OEH above.

**Objective Evidence**

- EMP 2005 (Section 6.2)
- General Incident Reporting Form
- Significant Incident Reporting Form
- Compliance Rectification process

**Notes**

See Questions 11.3.5 and 11.3.6.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 11.3.8**

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***Do the written procedures include the formation of investigating teams and their responsibilities in the event of a major or significant accident or incident?***

- Yes  
 No  
 Not Applicable

**Category: Recommended**

**Rating: 10**

**Score: NA**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** See response to Question 11.3.5. Where appropriate the OEH Environment Manager would work with MQS to investigate and respond to environmental incidents on site. In the

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event of a major or significant accident or incident requiring resources that extend beyond the OEH Quarantine Station Environment team, OEH may call upon its Specialist Investigations and Legal units.

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- EMP 2005 (Section 6.2)
- Significant Incident Report Form
- Compliance Rectification process

**Notes**

Section 6.2 'Environmental Incident Response Protocol' of the EMP and the Significant Incident Report Form both provide for the investigation of incidents. There are no specific procedures for the formation of investigation teams.

A formal procedure is not considered necessary given the small number of incidents at the site and the high level of oversight exercised through Lease Control Meetings.

**Recommendations – Ranking: NA**

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**Question 11.3.9**

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***Do the written procedures require written reports of findings, actions taken and recommendations?***

- Yes  
 No  
 Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** See responses to Questions 11.3.5 and 11.3.8. An incident report form must be completed to detail the procedures followed and the actions and preventative measures taken. The incident is recorded in the Incident Register and reported on in IMAMS.

**MQS:** MQS concurs with the OEH above and further notes and reports must be given to MQS' insurers.

**Objective evidence**

- EMP 2005 (Section 6.2)
  - General Incident Reporting Form
  - Significant Incident Reporting Form
-

## Notes

The Significant Incident Reporting Form includes a section called 'Management Response to Significant Incident' to document the proposed response actions and implementation details such as 'person responsible' and 'date forecast to be completed'. This section is completed and provides the basis for reporting to Lease Control Meetings.

## Recommendations – Ranking: N

There is no recommendation.

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### Question 11.3.10

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#### *Do the written procedures provide for:*

- Environmental impact assessment
- Social impact assessment
- Cultural heritage impact assessment
- Initial assessment of potential financial loss
- Assessment of long-term financial liability
- Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: NA**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### **Management Assertion**

**OEH:** See response to Question 11.3.5 and 11.3.8 regarding natural and cultural heritage impacts. These matters are covered in Section 6.2 of the EMP. Financial risk matters are not covered under Section 6.2 of the EMP. Questions on financial risk management are more appropriately answered by MQS.

**MQS:** MQS concurs with the OEH above, save for the fact that matters concerning financial loss and/or liability are commercial and confidential matters for discussion between MQS and its accountants.

#### **Objective Evidence**

- EMP 2005 (Section 6.2)

#### **Notes**

There are no written procedures which detail the issues that should be addressed in an incident investigation.

A formal procedure is not considered necessary given the small number of incidents at the site and the high level of oversight exercised through Lease Control Meetings.

**Recommendations – Ranking: NA**

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**Question 11.3.11**

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***Do the written procedures provide for manager's responsibilities:***

- In controlling an environmental incident or accident
- In investigating and reporting an environmental incident or accident
- In following up the environmental incident or accident
- Not Applicable

**Category: Necessary**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** See Question 11.3.5. The Environment Manager is to be notified in the event of any environmental incident or accident. The Conditions of Approval and the Environmental Management Plan specify the role of the Environment Manager and the responsibilities of the position. All environmental incident or accidents are recorded, investigated and reported. If the Environment Manager is not satisfied with the response provided they will a follow up during and after the environmental incident or accident has occurred.

**MQS:** MQS Concurs with the OEH above.

**Objective evidence**

- EMP 2005 (Section 6.2)
- General Incident Reporting Form
- Significant Incident Reporting Form

**Notes**

Section 6.2 'Environmental Incident Response Protocol' of the EMP sets out requirements for reporting environmental incidents. Mirvac Emergency Response Procedures specify roles and responsibilities of managers in emergency situations.

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 12 MONITORING AND MEASUREMENT**

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**Question 12.1**

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***Have the co-proponents established and maintained an integrated monitoring program?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** A monitoring program has been established for the site. The program is known as the "Integrated Monitoring and Adaptive Management System" (IMAMS). MQS prepared IMAMS which was approved by the OEH on the 29 March 2007 and the Department of Planning and Infrastructure on 28 May 2007. Pages 6-8 of IMAMS outline how the Plan meets the conditions of approval 216, 217, and 219. MQS engaged a consultant (Tony Griffin ) to review IMAMS as required by the Conditions of Approval. OEH provided MQS with a response to the IMAMS review in November 2011. QSCC members were sent a copy of the IMAMS review for their information prior to the QSCC meeting held on 16 November 2011.

**MQS:** Concur with the OEH above.

**Objective evidence**

- IMAMS Policy 2006
- Department of Planning Letter of approval for IMAMS
- DEC letter of approval for IMAMS
- IMAMS Bi-annual Report January-June 2011
- IMAMS Review
- OEH letter to MQS re: response to IMAMS review
- QSCC Agenda

**Notes**

The Integrated Monitoring and Adaptive Management System (IMAMS) Policy 2006 was reviewed. Pages 6-8 of the IMAMS Policy identify how the system has been developed to meet the relevant CoA including 216 and 217. A letter from the (then) DEC approving the IMAMS (dated 29/3/07) and an approval letter from the Department of Planning (dated 28/5/07) were reviewed. Both of these letters confirmed that the relevant authorities had approved the IMAMS and the requirements of CoA 216 to 220 were satisfactorily met. IMAMS Bi-annual reports have been sighted which confirms that the IMAMS indicators are being monitored and reported. The IMAMS review by Tony Griffin was sighted as well as OEH's letter of response to MQS which indicates that the IMAMS is being maintained and regularly reviewed.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.2**

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***Do the co-proponents comply with the requirement that the outcomes of the integrated monitoring program should be regularly reviewed?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Operational Phase only

**Responsibility:** Joint

**Management Assertion**

**OEH:** The results of IMAMS are reviewed by MQS, OEH and the QSCC via the six monthly monitoring reports and the annual sustainability report.

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- IMAMS Bi-annual Report January-June 2011
- Annual Sustainability Report 2009
- OEH Environment Manager's six monthly status report
- Annual IMAMS Data Reporting Form
- QSCC Agenda

**Notes**

The outcomes of the integrated monitoring program are regularly reviewed. The Annual Sustainability Report and Environment Manager's six monthly status reports are reviewed at HSE Committee and Lease Control Meetings as well as being provided to the QSCC.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.3**

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***Do the co-proponents comply with the requirement that the outcomes of the integrated monitoring program should be used to adjust management practices to conserve the significance of the site?***

- Yes  
 No  
 Not Applicable

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Operational Phase only

**Responsibility:** Joint

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### Management Assertion

**OEH:** IMAMS Results from the monitoring program are used to adjust management practices to conserve the significance of the site where needed and as appropriate. A recent example is traffic calming in response to bandicoot mortalities at North Head.

**MQS:** MQS concurs with the OEH above.

### Objective Evidence

- Lease Control Meeting Minutes
- Staff Interviews

### Notes

Lease Control Meeting Minutes indicate IMAMS data is a constant input to discussions and decision-making, and both OEH and MQS management assert that they make active use of IMAMS data.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 12.4

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***Do the co-proponents comply with the requirement to undertake a regular review of the overall integrated monitoring program concurrent with or prior to the ongoing comprehensive audits of the activity?***

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Operational Phase only

**Responsibility:** MQS

### Management Assertion

**MQS:** IMAMS is currently subject to review. MQS refers to the assertions of MQS and the OEH in Question 12.1 concerning details of the IMAMS review.

### Objective Evidence

- IMAMS Review
- OEH letter to MQS re: response to IMAMS review
- QSCC Agenda

### Notes

The external review of IMAMS by Tony Griffin of the University of Technology in June 2011 was sighted as well as OEH's letter of response to MQS which provided their comments on the review and attached comments on individual indicators. The QSCC Agenda was reviewed which confirmed that the IMAMS review by Tony Griffin was an agenda item.

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Possible amendments to IMAMS are being considered as part of the 5 yearly review of site wide management plans.

**Recommendations – Ranking: N**

There is no recommendation.

**Question 12.5**

***Using your professional judgement, evaluate the effectiveness of the organisation's documented inspection programs to include:***

Item	Condition	Response
Visitor access information	217(a)	Yes - Site Inspection Checklist
Site interpretive program	217(b)	Yes - IMAMS
Aboriginal heritage program	217(c)	Yes - IMAMS
Cultural heritage program	217(d)	Yes - IMAMS
Flora and fauna	217(e)	Yes - Site Inspection Checklist
Seagrasses	217(f)	Yes - Site Inspection Checklist
Soil and erosion	217(g)	Yes - Site Inspection Checklist
Noise	217(h)	Yes - Site Inspection Checklist
Stormwater management	217(i)	Yes - Site Inspection Checklist
Resource use	217(j)	Yes - IMAMS
Waste management	217(k)	Yes - IMAMS
Training	217(l)	Yes - IMAMS
Emergency Plant		Yes - IMAMS
Traffic		Yes - Site Inspection Checklist

**Category: Recommended - Professional Judgement**

**Rating: 10    Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH has established a site inspection checklist for the Quarantine Station site. The site inspection checklist prompts OEH Quarantine Station Staff to observe key issues throughout the site commenting if the key issue is compliant, does not comply, partially complies, was not applicable or not inspected. Key issues include but are not limited to: soil and water controls, flora and fauna protection, noise mitigation, dust control, traffic and parking, built heritage, archaeology, waste, marine environment, visitor safety, security and grounds maintenance. Quarantine Station inspections are carried out at least once weekly. The IMAMS program is used by MQS and OEH to address many monitoring parameters including those listed in Condition of Approval 217 a) - l).

**MQS:** MQS concurs with the OEH above and further notes that IMAMS and its reports are MQS' principal system for managing the above indicators.

**Objective evidence**

- IMAMS Policy 2006
- Site Inspection Checklist
- IMAMS Bi-annual Report January-June 2011

**Notes**

An effective inspection program exists for all of the identified items. As shown in the table, this includes OEH site inspections and data recorded for IMAMS. The Property Manager also undertakes regular, documented site inspections.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.6**

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*Using your professional judgement, evaluate the effectiveness of the organisation's monitoring and measurement programs to include:*

Item	Condition	Response
Visitor access information	217(a)	Yes
Site interpretive program	217(b)	Yes
Aboriginal heritage program	217(c)	Yes
Cultural heritage program	217(d)	Yes
Flora and fauna	217(e)	Yes
Seagrasses	217(f)	Yes
Soil and erosion	217(g)	Yes
Noise	217(h)	Yes
Stormwater management	217(i)	Yes
Resource use	217(j)	Yes
Waste management	217(k)	Yes
Training	217(l)	Yes

**Category: Regulatory Requirement / Professional Judgement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Conditions of Approval 217 a) - l) are monitored as part of IMAMS. IMAMS includes indicators, monitoring method and adaptive management responses for each aspect listed in the table above. Monitoring has been implemented for some indicators for the areas of Visitor Access, flora and fauna, sea grasses, soil and erosion, noise, storm water management, waste management, training, site interpretive program, aboriginal heritage, cultural heritage, and resource use.

OEH has established a site inspection checklist for the Quarantine Station site. The site inspection checklist prompts OEH Quarantine Station Staff to observe key issues throughout the site commenting if the key issues complies, does not comply, partially complies, was not applicable or not inspected.

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**MQS:** MQS concurs with the OEH above and further notes and relies upon the assertions made by MQS and the OEH in response to Question 12.5.

**Objective evidence**

- IMAMS Policy 2006
- Site Inspection Checklist
- IMAMS Bi-annual Report January-June 2011
- IMAMS Review

**Notes**

The listed items are monitored and measured through the IMAMS. Page 6 of the IMAMS Policy outlines how and where the conditions are met including CoA 217 a) – l). The IMAMS Policy, p.9 states that “formal monitoring is the basis of the IMAMS, and features some 150 specific indicators, each with a pre-set benchmark, acceptable range (desirable performance), monitoring method and potential responses should the result be outside the acceptable range”. The IMAMS indicators have been established to represent environmental, cultural, social and economic conditions of sustainability.

The continuing effectiveness of the IMAMS indicators was addressed in the IMAMS Review conducted by Tony Griffin and the OEH response.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.7**

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*Using your professional judgement evaluate the effectiveness of the organisation's analysis of monitoring and measurement results to include:*

Item	Condition	Response
Visitor access information	217(a)	Yes
Site interpretive program	217(b)	Yes
Aboriginal heritage program	217(c)	Yes
Cultural heritage program	217(d)	Yes
Flora and fauna	217(e)	Yes
Seagrasses	217(f)	Yes
Soil and erosion	217(g)	Yes
Noise	217(h)	Yes
Stormwater management	217(i)	Yes
Resource use	217(j)	Yes
Waste management	217(k)	Yes
Training	217(l)	Yes

**Category:** Necessary - Professional Judgement

**Rating:** 15      **Score:** 15

**Application:** Construction and Operational Phases

**Responsibility:** Joint

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### Management Assertion

**OEH:** OEH collect, collate, analyse, report and store data for the sustainability indicators (flora and fauna, Aboriginal heritage and training of OEH staff and contractors). Procedures for data management are outlined in IMAMS and the IMS/GIS outline.

**MQS:** MQS concurs with the OEH above and further notes and relies upon the assertions made by MQS and the OEH in response to Questions 12.5.and 12.6.

### Objective Evidence

- IMAMS Policy 2006
- Monitoring indicator databases
- IMAMS Bi-annual Report January-June 2011
- Annual Sustainability Report 2009
- OEH Environment Manager's six monthly status report
- Annual IMAMS Data Reporting Form

### Notes

See Question 12.2 and 12.4

IMAMS includes procedures for analysing raw data to produce operationally relevant indicators, in some cases with trigger values for action. These indicators are regularly used as a basis for management decision-making.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 12.8

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*Using your professional judgement, evaluate the effectiveness of the organisation's reporting of monitoring and measurement results to include:*

Item	Condition	Response
Visitor access information	217(a)	Yes
Site interpretive program	217(b)	Yes
Aboriginal heritage program	217(c)	Yes
Cultural heritage program	217(d)	Yes
Flora and fauna	217(e)	Yes
Seagrasses	217(f)	Yes
Soil and erosion	217(g)	Yes
Noise	217(h)	Yes
Stormwater management	217(i)	Yes
Resource use	217(j)	Yes
Waste management	217(k)	Yes
Training	217(l)	Yes

**Category:** Necessary - Professional Judgement

**Rating:** 15      **Score:** 15

**Application:** Construction and Operational Phases

**Responsibility:** Joint

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### Management Assertion

**OEH:** OEH collect, collate, analyse, report and store data for the sustainability indicators (flora and fauna, Aboriginal heritage and training of OEH staff and contractors). Procedures for data management are outlined in IMAMS and the IMS/GIS outline.

**MQS:** MQS concurs with the OEH above and further notes and relies upon the assertions made by MQS and the OEH in relation to Questions 12.5, 12.6 and 12.7.

### Objective Evidence

- IMAMS Policy 2006
- Monitoring indicator databases
- IMAMS Bi-annual Report January-June 2011
- Annual Sustainability Report 2009
- OEH Environment Manager's six monthly status report
- Annual IMAMS Data Reporting Form

### Notes

IMAMS reporting has been provided on a monthly, bi-annual and annual basis throughout the life of the project, in accordance with established reporting formats.

### Recommendations – Ranking: N

There is no recommendation.

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### Question 12.9

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***Do the co-proponents maintain an inventory of all environmental or pollution monitoring and measuring equipment?***

- Yes  
 No  
 Not Applicable

**Category:** Essential

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** MQS

### Management Assertion

**OEH:** OEH uses a Nutri-Tech solution Soil pH and Moisture to conduct the quarterly Long-nosed Bandicoot foraging monitoring for the Quarantine Station.

**MQS:** MQS retains details of its environmental and pollution monitoring and measurement equipment. MQS' environmental and pollution monitoring equipment consists of the following:

- Trip switches in building P27 that cut off audio equipment used for functions of the noise exceeds the determined level.
  - Noise monitoring in the outdoor dining area of the restaurant.
  - Three noise monitoring machines that are used by tour guides to measure noise generated during night tours, and
-

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- Solids and silt water monitoring systems for stormwater that are used in 3 random locations of the site per month.

**Objective Evidence**

- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011

**Notes**

While there is no single document which provides an inventory of environmental monitoring and measurement equipment, details of the equipment are maintained on file and are readily accessible.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.10**

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***Do the co-proponents maintain documented environmental monitoring and measurement procedures?***

- Yes  
 No  
 Not Applicable

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** IMAMS provides the environmental monitoring procedures to be followed by OEH staff and contractors in undertaking OEH environmental monitoring roles.

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Annual Sustainability Report 2009
- OEH Environment Manager's six monthly status report

**Notes**

Appendix A 'Monitoring and adaptive management system for optimal environmental conditions' of the IMAMS Policy documents environmental monitoring and measurement procedures. IMAMS reports were reviewed which indicates that the monitoring and measurement procedures are being followed.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.11**

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***Do the co-proponents maintain a program for conducting and recording periodic calibration of all monitoring and measuring equipment which if not calibrated correctly may cause an adverse impact on the environment?***

- Yes  
 No  
 Not Applicable

**Category: Essential +ISO 14001**

**Rating: 20**

**Score: 0**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH uses a Nutri-Tech solution Soil pH and Moisture to conduct the quarterly Long-nosed Bandicoot foraging monitoring for the Quarantine Station. This instrument comes pre-calibrated and does not need recalibrating. Put simply, the unit does not require calibration.

**MQS:** MQS calibrates its noise monitoring units against each other. If inconsistencies are evident, then the machines are replaced.

**Objective evidence**

- Soil pH and Moisture Meter information sheet

**Notes**

Arrangements are in place for testing and calibration of monitoring equipment and details are maintained on file. See Question 12.9.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.12**

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***Do the co-proponents report the results of all mandatory monitoring in the manner prescribed by regulatory requirements?***

- Yes  
 No  
 Not Applicable
-

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**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH reports on all mandatory monitoring as set out in IMAMS in the matter prescribed by the relevant regulatory requirements. The Table below identifies the matters with OEH monitors and how often it monitors:

Monitoring requirement	When
Aboriginal sites	Annually
Sunshine Wattle abundance	Annually
Camfields Stringybark condition	Annually
Fauna deaths	Annually
Little Penguin breeding burrows	Annually
QSCC attendance	Annually
Fuel hazard reduction	Annually
Black rat abundance	Bi-annually
Long nose bandicoot mortality	Bi-annually
Bandicoot foraging habitat	Quarterly
Fox abundance	Quarterly
Cat abundance	Quarterly
Rabbit abundance	Quarterly

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- Monitoring & IMAMS reporting requirements spreadsheet
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Annual Sustainability Report 2009
- OEH Environment Manager's six monthly status report

**Notes**

IMAMS sets out all mandatory monitoring reporting that is required. The objective evidence was reviewed which confirms that reporting is being undertaken in accordance with IMAMS.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.13**

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*Do the co-proponents identify and maintain monitoring and sampling points as prescribed by regulatory requirements, or as required for employees or contractors to undertake sampling programs?*

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- Yes  
 No  
 Not Applicable

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The IMAMS monitoring summary and separate collection guidelines identify specific points or locations from where data is to be collected for each indicator.

OEH also conducts Long-nosed Bandicoot foraging habitat monitoring at specific sampling points across the Quarantine Station and North Head control sites.

Long-nosed Bandicoot trapping sites are marked in the field with flagging tape. Known Little Penguin burrows are marked with permanently installed, numbered metal discs to assist in monitoring.

Sunshine wattle are tagged and numbered.

**MQS:** MQS concurs with the OEH above. In addition, MQS notes its sampling and monitoring points as follows:

- Noise monitoring is conducted in a set location of the site, being the outdoor dining area of the wharf precinct.
- Furthermore, noise monitoring is conducted by tour guides throughout the site during tours on the pre-determined tour routes.
- Trip switches have been installed in building P27 to cut off audio equipment if noise levels during a function have been exceeded.
- Staff living on the site audibly monitor noise and report to management as and when necessary.
- Monitoring systems for solids and silts in stormwater are used at three locations on the site, chosen at random each month.

**Objective evidence**

- IMAMS Policy 2006 (Appendix A)
- IMAMS Bi-annual Report January-June 2011

**Notes**

Appendix A 'Monitoring and adaptive management system for optimal environmental conditions' of the IMAMS Policy outlines the monitoring method for each individual indicator. It provides details on the 'what', 'how', 'who' and 'when' for each monitoring method including the identification of monitoring and sampling points.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 12.14**

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***Does the monitoring and measurement program conform to the following additional requirements of ISO 14001?***

- Procedures for monitoring and measurement of key characteristics of operations and activities that can have a significant impact on the environment are documented
- Documented procedures define intervals for monitoring and measuring key characteristics on a regular basis
- Monitoring and measurement activities are directly associated with the organisation's identified significant environmental aspects that can have a significant impact on the environment
- Records of monitoring and measuring activities are available to track performance, relevant operational controls and conformance with the organisation's objectives and targets
- The programs for calibration and maintenance of monitoring equipment are undertaken in accordance with the organisation's documented procedures
- Records are available for the calibration and maintenance of monitoring equipment

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Management Assertion**

**OEH:** IMAMS covers the following:

Procedures for monitoring and measurement of key characteristics of operations and activities that can have a significant impact on the environment are documented  
Documented procedures define intervals for monitoring and measuring key characteristics on a regular basis  
Monitoring and measurement activities are directly associated with the organisation's identified significant environmental aspects that can have a significant impact on the environment  
Records of monitoring and measuring activities are available to track performance, relevant operational controls and conformance with the organisation's objectives and targets

PH soil moisture meters and scales are used for the bandicoot monitoring which are not calibrated.

**MQS:** MQS concurs with the above. In addition, it is the view of MQS that it complies with all of the additional requirements of ISO 14001 above and in doing so relies upon its assertions given for Questions 12.9, 12.11 and 12.13.

**Objective evidence**

- Monitoring & IMAMS reporting requirements spreadsheet
  - IMAMS Policy 2006
  - IMAMS Bi-annual Report January-June 2011
  - Soil pH and Moisture Meter information sheet
  - Bandicoot foraging habitat monitoring field sheet
  - Monitoring indicator databases
  - Annual IMAMS Data Reporting Form
  - Annual Monitoring Report 2010
-

**Notes**

The IMAMS Policy, IMAMS reports and monitoring indicator databases were reviewed which indicates that the monitoring and measurement program conforms to the additional ISO 14001 requirements listed above.

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 13 EVALUATION OF COMPLIANCE**

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**Question 13.1**

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***Have the co-proponents established a procedure(s) that is maintained, for periodically evaluating compliance with applicable legal requirements and other requirements to which they subscribe?***

- Yes  
 No

**Category:** ISO14001 Requirement

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH periodically evaluates and reports on compliance with applicable legal requirements and other requirements using the following methods:

- *Annual Sustainability Report:* OEH and MQS produce an Annual Sustainability Report which includes a summary of compliance with development approvals
  - *Internal Bi-annual Environment Manager and Lease Compliance Report:* this informs OEH management of non-conformity matters at the Quarantine Station
  - *Monthly OEH-MQS lease control meetings:* A fixed agenda item of the monthly OEH/MQS lease control meetings relates to compliance matters. This item is an opportunity for MQS/OEH to raise compliance matters and to subsequently follow up and monitor the matters raised.
  - *Site inspections:* the Quarantine Station Environment Manager undertakes site inspections of the Quarantine Station on an as needs basis. The site inspections tend to be more frequent during periods of construction works on site. A standard site inspection check list is used to record the purpose of each inspection, inspection findings and a recommendation(s). OEH maintains a site inspection register which is stored at the Quarantine Station site office. The register contains inspection checklists dating back to December 2006.
  - *OEH protocol for the management of non-compliances:* the protocol established in December 2006, documents the formal process for the rectification of non-conformances leading to breaches under the lease. The protocol is based on the process outlined in the OEH Property and Leasing Manual. This manual is currently undergoing major rewrites and the Environmental Performance Manager plans to review the protocol in 2012 in light of changes to the property manual
  - *OEH Lease Compliance Database:* The database has been in operation since 2006. In 2012, the database was reviewed and subsequently amended (refer to Question 14.1 for further information). The database outlines the procedure followed by OEH when a non-compliance is identified
  - *EMP Chapter 10:* This chapter outlines potential adverse impacts of proposed activities at the Quarantine Station and identifies compliance and best practice requirements in accordance with the Conditions of Approval. It further stipulates action required and who is to undertake the action and when. The chapter is structured as a table, so that it can be used to audit compliance with the Conditions of Approval.
  - *EMP and other site wide plan reviews:* The EMP and ten other site wide plans are currently being reviewed. An important component of the review has been the population of a database that identifies the status of every plan action. The database
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results help to inform the OEH of compliance with site wide plan requirements/actions.

- *New Draft EMP:* Environment Manager Sian Waythe has commenced drafting a new EMP. Under the section on “Key Statutory Drivers” (page 7), the draft states “As a Government agency, the activities of the OEH are covered by a complex regime of legislation and national agreements. OEH is committed to comply with all applicable environmental laws, regulations and agreements, and requires the compliance of a lessee, such as MQS, and their contractors and sub-contractors and suppliers.” The document goes on to state that in order to meet this commitment, the EMP amongst other things provides for the periodic evaluation of compliance with relevant environmental legislation and obligations.

**MQS:** Yes, MQS has established procedures for periodically evaluating compliance with applicable legal requirements and other appropriate requirements. These procedures are as follows:

- The Lease contains the majority of the legal requirements for the site. MQS Quarantine Station has not received any substantive notice of non-compliance to date.
- Legal requirements are, inter alia, presented as indicators in the IMAMS Policy with consequent monitoring data evaluated in the preparation of its bi-annual and annual reports. IMAMS data is also relevant to the production of the Annual Sustainability Report.
- Monthly Lease control meetings provide a forum for both MQS and the OEH to discuss any legal and compliance matters.
- Monthly management meetings provide a forum similar to the Lease Control Meetings above.
- The Q Station Health, Safety and Environment Committee is a further forum for discussion of legal and compliance matters.
- MQS staff undertake regular inspections of the site in accordance with their duties and responsibilities.
- Section 2 of the Sustainability Policy outlines MQS Quarantine Station’s commitment to compliance and its evaluation.

**Objective evidence**

- EMP 2005 (Chapter 10)
- Entire Site wide plan review action status database
- Annual Sustainability Report 2009
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Lease
- OEH Environment Manager’s six monthly status report
- Lease Control Meeting Minutes
- Annual Monitoring Report 2010
- HSE committee Minutes
- MQS Sustainability Policy 2007
- Lease/Contract Compliance Report – Bi-annual
- OEH Q-Station Lease Compliance Database

**Notes**

The co-proponents have comprehensive mechanisms in place to monitor and report on compliance with the Lease and CoA.

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The Annual Sustainability Report 2009 was reviewed and found to address the requirements of CoA 224.

Compliance is monitored through the IMAMS, as well as conducting regular site inspections and the 5 yearly environmental audit (assessing compliance with CoA). The Q-Station Lease compliance database, which demonstrates that the Environmental Manager reviews and initiates response to any non-compliance with the lease was sighted. The OEH Environment Manager's six monthly status report 2011 was sighted which includes a summary of compliance with conditions of approval and lease. The Lease/Contract Compliance Report was sighted which reports on non-compliances with the Lease. Additionally, the Lease Control Meeting minutes were sighted which have 'compliance with Conditions of Approval and lease' as a fixed agenda item for discussion.

Other legal and regulatory requirements are set out in Chapter 4 of the EMP. However as noted in Question 3.1.1 these requirements have not been updated to take account of legislative changes and no specific process has been undertaken to review compliance.

**Recommendations – Ranking: I**

It is recommended that the revised EMS should include a procedure for evaluating compliance with all legal and other requirements, including those not contained in the Lease and Conditions of Approval.

See also Recommendation 3.1.1

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**Question 13.2**

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***Do the co-proponents keep records of results of periodic evaluations of compliance with applicable legal and other requirements?***

- Yes  
 No  
 Not Applicable

**Category: ISO14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** OEH keeps records of results of periodic evaluations of compliance with applicable legal requirements. Records include:

- OEH lease compliance database. The OEH has been using a lease compliance database since 2006 to record the results of evaluations of compliance with legal and other requirements. As discussed further in Question 14.1, the Environmental Performance Manager and OEH Business Operations Officer responsible for the Quarantine Station lease under took a review of the QS lease compliance database in early 2012. In response to the review findings, the lease compliance database was amended to ensure that OEH clearly identifies the reason for any non-conformity and to make a recommendation on what action is required to avoid a reoccurrence of the non-compliance in the future.
-

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- Quarantine Station Environment Manager's six monthly report and the biannual lease compliance report (internal documents).
- Annual Sustainability Report
- Comprehensive Audits
- Completed site inspection forms which are kept in a hard copy folder at the OEH Quarantine Station site office.

**MQS:** Yes, MQS keeps records of the results of periodic evaluation of compliance with appropriate legal and/or other requirements. These records fall into three categories, being; the production of reports, minutes of meetings as well as the retention of records relating to approvals.

**Objective evidence**

- Annual Sustainability Report 2009
- IMAMS Policy 2006
- IMAMS Bi-annual Report January-June 2011
- Lease
- OEH Environment Manager's six monthly status report
- Lease Control Meeting Minutes
- Annual Monitoring Report 2010
- HSE committee Minutes
- Lease/Contract Compliance Report – Bi-annual
- Site Inspection Checklist
- OEH Q-Station Lease Compliance Database
- 2007 Audit Report

**Notes**

All evaluations of compliance that have been undertaken have involved documented processes, and records have been maintained.

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 14 NON-CONFORMITY, CORRECTIVE ACTION & PREVENTIVE ACTION**

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**Question 14.1**

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***Have the co-proponents established a procedure(s) that is maintained, for dealing with actual and potential non-conformities with environmental management obligations in relation to the project, and for taking corrective action and preventive action?***

- Yes  
 No

**Category:** ISO14001 Requirement

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** Yes, OEH has a procedure in place to address the requirements of ISO14001. The Environmental Performance Manager (EPM) (and the OEH Business Operations Officer (BOO) reviewed the procedure in early 2012. In response to the review findings, the EPM and BOO amended the procedure to ensure that OEH clearly identifies the reason for a non-conformity and to make a recommendation on what action is required to avoid a reoccurrence of the non-compliance in the future.

The revised procedure involves the following steps:

1. Identify non-conformity i.e. through site inspections, meetings with MQS, review of documents
2. Enter non-conformity into the OEH Quarantine Station Lease Compliance Database (available on the OEH share drive). Each non-conformity must be given a unique TRIM document number and all documents must be assigned to TRIM file number: 12/942
3. In the database record the following information about the non-conformity:
  - Date that the non-conformity was entered into the database
  - Description of the non-conformity
  - OEH officer or other person who identified the non-conformity
  - Define who the issue was referred to. Note: Any non-conformity should in the first instance, be referred to the OEH Business Operations Officer responsible for the Quarantine Station Lease who will then refer the matter to MQS
  - Specify the method of referral i.e. letter or email. Referral of any non-conformity issue to MQS should be done in writing
  - Record the name of the person who referred the issue.
  - Select from the database drop down list the non-conformity's priority: high, medium or low
  - Clearly state the recommended action to be taken to avoid reoccurrence of the issue in the future
  - Select from the database drop down list the appropriate status for the non-conformity: open, closed, unresolved. The status must be updated over time as the matter progresses
  - State the date that the issue was "closed" i.e. once the matter has been resolved
  - Describe the outcome of the issue

As can be seen from the steps outlined above, correspondence regarding any non-conformity from OEH to MQS is to be in writing and the progress for resolving any non-conformity is to be recorded and tracked through the lease compliance database.

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The OEH produces an internal bi-annual lease compliance report which informs OEH management of non-conformity matters at the Quarantine Station

In December 2006, an internal protocol for the management of activities potentially non-compliant with the Quarantine Station Lease, Conditions of Approval or other legislative obligations was established. The protocol documents the formal process for the rectification of non-compliances leading to breaches under the lease. The protocol was based on the process outlined in the OEH Property and Leasing Manual at the time. Some modifications were made to take into account the specific requirements of the Quarantine Station lease. As the protocol is an internal OEH document it does not sit within the EMP.

As part of the 2012 review of the Quarantine Station compliance system, the EPM and BOO plan to review the protocol. This will be undertaken later in 2012 following the current major rewrite of the OEH Property and Leasing Manual. The review will also consider any discrepancies between the protocol and Property and Leasing Manual arising from the rewrite of the manual.

**MQS:** Yes, MQS has procedures for dealing with reasonable non-conformities as well as those which are of a reasonably calculable nature and properly attributable to the activities of MQS. The preceding applies for the taking of preventative or corrective action. These procedures include; Lease Control Meetings, Q Station Health, Safety and Environment Committee Meetings, IMAMS (and associated reports), site wide plans as well as the operation of the relevant Mirvac Policies.

#### **Objective evidence**

- Non-compliance management protocol
- Lease/Contract Compliance Report – Bi-annual
- Site Inspection Checklist
- OEH Q-Station Lease Compliance Database
- Revised OEH Q-Station Lease Compliance Database
- Standard lease compliance rectification letter
- Compliance Rectification Requirement 07/017

#### **Notes**

The objective evidence was reviewed. Actual and potential non-conformities are identified through site inspections, incident reports, document review and meetings between MQS and OEH. These are then documented in the lease compliance database which provides details of non-conformances, investigations, communications, actions and follow-up including corrective and preventive actions. The non-compliance management protocol was sighted which documents the formal process for the rectification of non-compliances leading to breaches under the lease. Additionally, an example of a Compliance Rectification Requirement Notice given to MQS by OEH regarding 'unauthorised works in building P9', reference number 07/017 dated 19/7/07 was sighted which confirms that non-conformities are dealt with and instructions are given to resolve the situation.

#### **Recommendations – Ranking: N**

There is no recommendation.

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**Question 14.2**

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***Does the procedure(s) address the following requirements of ISO14001?***

- Identifying and correcting non-conformities
- Taking action to mitigate environmental impacts of nonconformities
- Investigating non-conformities
- Determining the cause of non-conformities
- Taking actions in order to avoid the recurrence of non-conformities
- Evaluating the need for action to prevent nonconformities
- Implementing appropriate actions designed to avoid the occurrence of nonconformities
- Recording the results of corrective action(s) and preventive action(s) taken
- Reviewing the effectiveness of corrective action(s) and preventive action(s) taken

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** Yes, See Question 14.1.

**MQS:** Yes, MQS complies with the above additional requirements of ISO 14001 and relies upon the assertions given for Question 14.1.

**Objective evidence**

- Non-compliance management protocol
- Lease/Contract Compliance Report – Bi-annual
- Site Inspection Checklist
- OEH Q-Station Lease Compliance Database
- Revised OEH Q-Station Lease Compliance Database
- Standard lease compliance rectification letter

**Notes**

The ISO 14001 requirements are addressed non-compliance management protocol. See Question 14.1.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 14.3**

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***Do the co-proponents comply with the requirement that actions taken are appropriate to the magnitude of the problems and the environmental impacts encountered?***

- Yes  
 No  
 Not Applicable

**Category:** ISO14001 Requirement

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The Quarantine Station lease compliance database helps the OEH to ensure that any action the agency adopts to address non-conformities is appropriate to the magnitude of the problems and the environmental impacts encountered. Following a review of the lease compliance database in early 2012, the database has subsequently been amended to more clearly identify:

- The reason for non-conformity
- The recommended action to be taken to avoid reoccurrence of the non-conformity in the future

The OEH is confident that the updated database will improve the document recording process for lease non-compliance issues at the Quarantine Station.

**MQS:** Yes, MQS works with the OEH to address appropriate responses to any problems or environmental impacts as and when they arise. An example of this is the discussions with the OEH in 2012 to develop a mutual response to bandicoot mortalities by introducing further traffic calming measures.

**Objective evidence**

- Non-compliance management protocol
- OEH Q-Station Lease Compliance Database
- Revised OEH Q-Station Lease Compliance Database

**Notes**

The OEH Q-Station Lease compliance database (including the revised 2012 version) were sighted. It appears that the actions taken to resolve the issue are appropriate to the magnitude of the problems and the environmental impacts encountered.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 14.4**

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***Do the co-proponents ensure that environmental management system documentation is adjusted to reflect actions taken to address non-conformities?***

- Yes  
 No  
 Not Applicable

**Category:** ISO14001 Requirement

**Rating:** 10

**Score:** 10

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** The author of the current and revised draft EMP, Sian Waythe, Quarantine Station Environment Manager asserts that during the drafting of the revised EMP, OEH considered the range of non-compliances that have occurred on the site since the commencement of MQS' lease.

**MQS:** The five yearly site wide plan review is currently in progress. MQS is conducting the review in conjunction with the OEH and evaluating monitoring data in developing the revised plans.

**Objective evidence**

- Draft EMP 2011
- EMP 2005
- Entire Site wide plan review action status database

**Notes**

The EMP as well as other site wide plans are currently being reviewed as part of the 5 yearly site wide plans review. Records of non-compliances that have occurred since the commencement of MQS' lease are available and Environment Manager asserts that these were considered developing draft EMP 2011.

**Recommendations – Ranking: I**

It is recommended that the revised EMP include mechanisms by which management plans and procedures can be modified on a more timely basis to reflect the results of actions taken to address non-conformities.

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## ELEMENT 15 CONTROL OF RECORDS

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### Question 15.1

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**Do the co-proponents maintain a record management system which includes environmental records and provides for:**

- Procedures for the control of records
- Identification of records
- Maintenance of records
- Disposition of records
- Legibility of records
- Protection against damage, deterioration and loss
- Identification with a specific element or aspect of the operations (eg activity, product or service)
- Retention times for environmental records

**Category: Recommended**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

### Management Assertion

#### OEH:

*Procedures for the control of records:* TRIM is OEH's automated records management system which is used to register and track hardcopy documents, files and boxes across the agency. The OEH Records Unit has established formal TRIM procedures for the control of all OEH records and it runs monthly training courses in the formal control of records through TRIM. TRIM User guidelines are also available on the OEH intranet. The Quarantine Station IMS/GIS Outline also covers the control of records. The Quarantine Station IMS/GIS Outline sets out the procedures for the control of records specific to the Quarantine Station and in doing so makes reference to the use of TRIM. The Quarantine Station IMS/GIS Outline includes a table that comprehensively identifies data types relevant to the Quarantine Station, the data format, storage location, back up arrangements and whether MQS or OEH is responsible. The IMS-GIS Outline is currently under review and a key component of the review is the action status database which lists the status of all actions included in the IMS-GIS Outline. This is a useful tool for determining OEH and MQS' success in developing and implementing the record control procedures set out in the IMS-GIS outline."

*Identification, maintenance and disposition of records:* As stated above, the document control system used by OEH is known as TRIM. Information and data including environmental documentation relating to the Quarantine Station project and site are kept electronically on the OEH/OEH share drive and in paper form in TRIM files that are located at the OEH Quarantine Station Site Office. Key documents recorded in TRIM (i.e. correspondence, reports etc.) are given a unique number and may be electronically searched for and retrieved manually. This is in accordance with the OEH records management policy.

*Legibility of records:* OEH's electronic files are kept in clearly labeled and easily interpreted subject folders. For example, documentation relating to the tender for the 2011 comprehensive environmental audit is kept in a TRIM file with the name "Property Management Tendering – Tendering – Quarantine Station Comprehensive Audit 2011" with file number "FIL11/9753".

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*Identification with a specific element or aspect of the operations (e.g. activity, product or service):* OEH staff can search the TRIM database for a specific element or aspect of the operation of the Quarantine Station and from this find out where the document folder is located and who it is assigned to. There are a number of different search methods available in TRIM to assist in finding information, for example a title word, record number and file location search.

*Protection against damage, deterioration and loss:* All electronic files are saved on the OEH/NPWS share drive which is automatically backed up every night. Printed files are stored at the OEH Quarantine Station site office which is kept locked when unattended.

*Retention times for environmental records:* Retention times for environmental records are governed by the OEH Records Management Policy and staff are directed to call the Archivist (9585 6064) for advice regarding the retention and disposal of records.

**MQS:** MQS concurs with the OEH above. See Elements 8 and 9 of this Audit.

**Objective evidence**

- OEH Records Management Policy
- IMS/GIS outline Review action status database
- IMS/GIS outline

**Notes**

The OEH Records Management Policy was reviewed. OEH uses TRIM (an automated records management system) which registers and tracks hardcopy documents, files and boxes across the agency. The Quarantine Station IMS/GIS Outline also covers the control of records and sets out the procedures for the control of records specific to the Quarantine Station as well as referencing the use of TRIM. The IMS/GIS Outline also identifies whether MQS or OEH are responsible for the record.

MQS retains electronic records on a central file server, and for some purposes, including personnel and incident records, relies on paper files stored in the administration building on site.

Generally, OEH records are considered to be the authoritative records of the project.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 15.2**

**Using your professional judgement, evaluate the effectiveness of the environmental records management system to include:**

	Response
Material on applicable Environmental laws or other requirements	Yes
Complaint records	Yes
Training records	Yes
Inspection, maintenance and calibration records	Yes
Monitoring records	Yes
Pertinent contractor and Supplier information	Yes
Incident reports	Yes
Information on emergency preparedness and response	Yes
Records of significant Environmental impacts	Yes
Audit results	Yes
Management reviews	Yes

**Category: Professional Judgement**

**Rating: 15**

**Score: 15**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:**

*Material on applicable Environmental laws or other requirements* – The Environmental Management Plan held at the Quarantine Station Environment Manager's office contains material on applicable environmental legislation and other requirements. OEH directs staff to [www.legislation.nsw.gov.au](http://www.legislation.nsw.gov.au) for up to date electronic access to environmental legislation.

*Complaint and comment records* – This is the chief responsibility of MQS. A fixed agenda item at the monthly OEH-MQS lease control meeting is the review of the complaints & comments register. The OEH also maintains a complaints & comments register at the OEH site office to record complaints or comments received regarding matters that the OEH is responsible for.

*Training records* – Induction training records for OEH staff and contractors are kept in a hard copy register at the OEH site office.

*Inspection, maintenance and calibration records:* Not applicable. OEH does not store or operate machinery on site.

*Monitoring records* – Bandicoot monitoring and other data used in the preparation of IMAMS monitoring reports is stored electronically on the OEH Share Drive. All IMAMS monitoring data is produced on standardised electronic worksheets (either Excel or Word) and reported on either quarterly, biannually or annually.

*Pertinent contractor and Supplier information* – Contracts are held in TRIM files at the OEH site office or the NPWS Harbour North Middle Head office.

*Incident reports* – Kept in a register held by MQS. OEH have a duplicate register at the OEH site office. .

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*Information on emergency preparedness and response* – held in the Visitor Management Plan, Escape route maps are located on wall at the OEH site office.

*Records of significant Environmental impacts* - REFs are stored in TRIM project files and can be found at the relevant project manager's office.

*Audit results* – stored in TRIM files at the OEH site office and electronically on the OEH server.

*Management reviews* – Records of the monthly lease meetings between OEH and MQS are held in TRIM files at the OEH site office and saved electronically on the OEH server.

**MQS:** MQS concurs with the OEH above. See Elements 7 to 12 of this Audit.

**Objective evidence**

- EMP 2005
- Incident Register
- Induction Register
- Complaints register
- Monitoring indicator databases
- Significant Incident Reporting Form
- Visitor Management Plan

**Notes**

These categories of records found to be included in the records management system.

**Recommendations – Ranking: N**

There is no recommendation.

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**ELEMENT 16.0 INTERNAL AUDIT**

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**Question 16.1**

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***Have the co-proponents complied with the requirement to ensure that internal audits of the Environmental Management Plan are conducted at planned intervals?***

- Yes  
 No

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** There is no regulatory requirement for internal environmental audits of the project, however OEH agrees that it is good environmental practice to undertake internal audits, in addition to external audits of environmental performance. To date, a formal internal audit of the Environmental Management Plan (EMP) has not been undertaken. This is due to delays in the completion of the construction program, which has required the Environment Manager (Sian Waythe) to focus her attention on construction compliance during periods of construction activity. Until such time as the construction phase is complete and a formal internal audit system is adopted, the following activities undertaken by OEH form an interim internal audit of the EMP:

- The five yearly EMP review is currently under way as required by CoA 195. An important component of the plan review process is the population of a database which clearly indicates the status of all EMP actions. The database is an excellent tool for analyzing the overall implementation of the plan since its adoption in 2005.
- An additional ten site wide plans are also currently under review
- Quarantine Station Environment Manager Sian Waythe has drafted a revised EMP (which is yet to undergo consultation with regulators)
- Monthly lease meetings: at the monthly OEH-MQS lease control meetings compliance matters are raised and monitored
- OEH and MQS will undertake a periodic comprehensive review of the EMP every five years or as necessary
- Site inspections: The Environment Manager undertakes site inspections of the Quarantine Station on an as needs basis. The site inspections tend to be more frequent during periods of construction works on site. A standard site inspection check list is used to record the purpose of each inspection, inspection findings and a recommendation(s). OEH maintains a site inspection register which is stored at the Quarantine Station site office. The register contains inspection checklists dating back to December 2006.

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- Entire site wide plan review action status database
  - EMP review coversheet
  - Lease Control Meeting Minutes
-

## Notes

A formal internal audit of the Environmental Management Plan is not conducted at planned intervals. The EMP is reviewed every 5 years as part of the 5 yearly site wide plans review which is currently being undertaken. The site wide plan review action status database was sighted which confirmed all site wide plans are currently being reviewed. The Monthly Lease Control Meeting minutes were also sighted which discuss compliance with CoA and lease between MGS and OEH. The site inspection register was sighted at the OEH site office which confirmed regular quarantine site inspections are conducted by the OEH environmental manager. These processes/activities including monthly lease control meetings, site wide plan reviews (including the EMP) and site inspections provide the basis for interim internal audits.

## Recommendations – Ranking: I

It is recommended that as part of the revised EMP, a program of internal audits and an internal audit schedule be developed consistent with the requirements of ISO 14001.

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### Question 16.2

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***Do the co-proponents maintain procedures for internal audits that conform to the following additional requirements of ISO 14001?***

- The organisation has established and maintained program(s) and procedures for conducting periodic internal audits
- The program and procedures are carried out to determine whether or not the environmental management system conforms to planned arrangements for environmental management
- The program and procedures are carried out to determine whether or not the environmental management system conforms to the requirements of ISO14001
- The program and procedures are carried out to determine whether or not the environmental management system has been properly implemented and maintained
- The program and procedures include the method for providing information on the results of audits to management
- The audit program includes a schedule for environmental management systems audits
- The audit program takes into consideration the environmental importance of the operations concerned
- The audit program takes into consideration the results of previous audits
- The audit procedures cover the audit scope, frequency, methodologies, responsibilities for conducting audits, requirements for conducting audits, requirements for reporting results
- The audit procedures provide for recording of changes in documented operating procedures resulting from corrective and preventive action

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 0**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

### Management Assertion

**OEH:** As discussed in Question 16.1, monthly lease control meetings, site wide plan reviews (including the EMP) and site inspections provide the basis for interim internal audits. Please refer to the response to Question 16.1 for further information. The Quarantine Station Environment Manager does intend to develop an internal audit schedule which will cover the stated ISO14001 requirements.

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**MQS:** MQS notes and concurs with the above. Furthermore, financial considerations aside, MQS is willing to co-operate with the OEH as needed in developing internal audit procedures.

**Objective evidence**

- Entire site wide plan review action status database
- EMP review coversheet
- Lease Control Meeting Minutes

**Notes**

See Question 16.1

**Recommendations – Ranking: I**

See Question 16.1

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**Question 16.3**

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***Do the co-proponents require environmental auditors to be independent of the area, location or facility being audited?***

- Yes  
 No

**Category:** Desirable

**Rating:** 5

**Score:** 5

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The Conditions of Approval call for independent external audits on a five yearly basis. In relation to internal audits, The OEH Environment Manager (Sian Waythe and Louise O’Flynn in Sian’s absence) remains independent of MQS and has to date been responsible for the implementation of interim internal audits including the review of site wide plans including the EMP, attending lease control meetings and conducting site inspections at the Quarantine Station. Refer to Quarantine Station Environment Manager’s role under Condition of Approval 52 and 53.

OEH also engaged an independent auditor to conduct a sewage facilities audit of National Park’s estate across NSW. The Quarantine Station was included in this audit. For further information on this audit please refer to Question 11.2.2.

**MQS:** Yes, MQS complies with this Question, Clause 19A.3 and Schedule 23 of the Lease as well as Conditions of Approval 226 to 233 as far as is possible. The independence of the Auditor is a requirement of the Technical Brief – Part B prepared by the OEH in October 2011 and is a matter properly within the personal knowledge of the Auditor. If there is any issue concerning the independence or conflict of interest of the Auditor in any way it is a matter for the Auditor to disclose.

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**Objective evidence**

- DECCW Audit of Sewage Management Facilities Report
- 2007 Audit Report

**Notes**

Section 2.5 'Periodic Evaluation' of the MQS Sustainability Policy states that "an auditor independent of the Quarantine Station site and operations" is a requirement for both internal and external auditors.

The 2007 audit conducted by GHD and the 2010 sewage management facilities audit were sighted which confirms that the auditors are independent of Quarantine Station. GABA auditors meet these requirements.

Internal audits are not currently conducted and no procedures for appointment of auditors have been developed.

**Recommendations – Ranking: I**

See Recommendation 16.1

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**ELEMENT 17 MANAGEMENT REVIEW**

**Question 17.1**

***Do senior management and/or the governing body of the organisation carry out reviews that evaluate:***

- The results of environmental audits
- The organisation's environmental performance
- The organisation's investments that may lead to potential environmental liabilities, including third party action
- The adequacy of the organisation's due diligence program
- The continuing suitability of the organisation's environmental policies
- The organisation's adoption of voluntary government or industry initiatives
- The continuing suitability of the organisation's environmental management structure
- The continuing suitability of the organisation's Environmental Management Plans
- The results of the organisation's monitoring and measurement programs, including evaluation of compliance with regulatory requirements
- The adequacy of the organisation's insurance cover relating to potential environmental liabilities

**Category: Essential**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:**

The results of environmental audits	In response to the 2007 comprehensive environmental audit, OEH senior management reviewed the audit results and recommendations. The results and recommendations were also presented to the OEH (EPRG) and the Department of Planning for Consideration
The organisation's environmental performance	The environmental performance of the project is reported on every six months through the Quarantine Station Environment Manager's Report as well as the Annual Sustainability and Annual Monitoring Reports
The organisation's investments that may lead to potential environmental liabilities, including third party action	As OEH is part of the NSW Government, this question is not applicable. OEH is not privy to information on MQS investments
The adequacy of the organisation's due diligence program	The OEH and MQS have developed a robust, environmental due diligence program which includes induction training for staff and contractors; site inspections of works in progress and other relevant matters; EIA processes for new works; a compliance management system and regular lease control meetings to review the project
The continuing suitability of the organisation's environmental policies	NPWS environmental policies that relate to the Quarantine Station are reviewed by the NPWS Policy Unit on a periodic basis
The organisation's adoption of voluntary government or industry initiatives	As OEH is a government agency this relates more to MQS

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The continuing suitability of the organisation's environmental management structure	The OEH's environmental management structure as it relates to the Quarantine Station was last reviewed in 2009/2010 as part of a departmental wide restructure. The current environmental management structure is considered suitable.
The continuing suitability of the organisation's Environmental Management Plans	Eleven Quarantine Station site wide plans are currently under review. A key component of each plan review is a the action status database which assists the OEH and MQS to determine the implementation of each plan since adoption. Each plan review makes a recommendation on the ongoing suitability of the plan i.e. requires amendment, requires rewrite or no change required
The results of the organisation's monitoring and measurement programs, including evaluation of compliance with regulatory requirements	Results from monitoring and measuring programs undertaken at the Quarantine Station are reported on in the Annual Sustainability and Annual Monitoring Reports. An evaluation of compliance with regulatory systems is also provided for in the Annual Sustainability Report. Furthermore, the OEH produces an internal six monthly Environment Manager's Report which includes a section on compliance with regulatory requirements.
The adequacy of the organisation's insurance cover relating to potential environmental liabilities	Appropriate insurance arrangements are in place

**MQS:** It is the view of MQS that it complies with the above requirements and has received no notifications to the contrary. MQS further notes that the above requirements of this question have been extensively addressed by MQS in all of the preceding questions of this Audit.

In relation to the requirement that the organisation's investments that may lead to potential environmental liabilities, including third party action, MQS complies with this requirement to the extent of possible on-site environmental liability.

**Objective evidence**

- OEH response to 2007 Audit recommendations
- Lease Control Meeting Minutes
- Entire site wide plan review action status database
- Annual Sustainability Report 2009
- OEH Environment Manager's six monthly status report
- IMAMS Bi-annual Report January-June 2011
- Annual Monitoring Report 2010

**Notes**

Senior management carries out reviews that evaluate the requirements listed above. Many of the requirements are evaluated and discussed during monthly Lease Control Meetings between MQS and OEH. The bi-annual IMAMS reports and Annual Sustainability Report evaluate the environmental performance of the organisation. The Site Wide Plan Review action status database was sighted which confirms site wide plans, including the EMP, are currently being revised.

**Recommendations – Ranking: N**

There is no recommendation

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**Question 17.2**

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***Does the organisation's top management undertake reviews of the environmental management system that conform to the following additional requirements of ISO 14001?***

- Top management is defined
- The intervals for management reviews are specified
- The EMS has been reviewed to ensure its continuing suitability, adequacy and effectiveness
- The management review has been documented
- Top management evaluates the adequacy of the information included in the management review
- Consideration of changing circumstances
- Consideration of the commitment to continual improvement
- Addresses the possible need for changes to environmental objectives and other elements of the EMS
- Do the procedures provide for recording of changes in documented operating procedures resulting from corrective and preventive action

**Category: ISO 14001 Requirement**

**Rating: 10**

**Score: 10**

**Application:** Construction and Operational Phases

**Responsibility:** OEH

**Management Assertion**

**OEH:** There is no EMS for this project; however the EMP partially fulfils this role. The EMP is currently under review and OEH top management (Manger Visitor Facilities and Services Section, Manager Property Services) are overseeing the review process. The Acting Visitor Facilities and Services Section Manager was involved in the review process from the beginning, for example, she had input into the content of the review project brief and review template. In this respect the Acting Manager evaluated the adequacy of the information to be included in the review.

Since commencement of the review process, the Section Manager and Manager Property Services have attended OEH-MQS meetings regarding the plan review which was an opportunity for them to be further engaged in the review process. It also demonstrates the top management's commitment to continual improvement through the review.

The plan review clearly identifies the status of each EMP strategy and through this the implementation.

A new EMP has also been drafted by Sian Waythe and reviewed by the QSCC. The draft EMP is yet to undergo stakeholder consultation. In the new version of the EMP disk copies of the other site wide plans will be included as an appendix."

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- Entire site wide plan review action status database
  - Email correspondence re: Quarantine Station site wide plan review
-

**Notes**

All matters listed in this question are being considered in the current review of the EMP. The existing EMP is required to be reviewed on a five yearly basis, which is less frequent than is normally required for EMS's consistent with ISO 14001. This has meant that there have been some delays in amending environmental management procedures and documentation to deal with changes in circumstances.

The revised approach to environmental management proposed in Recommendation 4.3 would provide for a more flexible and frequent review process. See also the Explanatory Note to Question 1.2 which discusses the nature of periodic reviews.

**Recommendations – Ranking: I**

It is recommended that the revised EMP provide scope for more frequent management reviews and updates of environmental procedures and documentation to deal with changing circumstances.

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**ELEMENT 18.0 PUBLIC REPORTING**

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**18.1 Voluntary Reports**

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**Question 18.1.1**

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*Do the co-proponents provide public information on the project, including its environmental aspects?*

- Yes  
 No

**Category:** Necessary

**Rating:** 15

**Score:** 15

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** The OEH and MQS provide the public with information on the project, including its environmental aspects. OEH and MQS have and continue to keep interested stakeholders informed through:

- The Quarantine Station Community Committee meetings which are held quarterly (see question 7.1.4)
- The OEH website has an allocated section on the [Quarantine Station](#) providing information to the public on the site's history and the current lease and it also provides a link to the [MQS website](#) for further information.
- Information on the Quarantine Station [site wide plans](#) can be downloaded on the OEH website.
- The OEH Public Affairs unit deal with all media related enquires and informs the community in the form of media releases.
- Community open days are another opportunity for OEH and MQS to provide information to the public on the project including its environmental projects. Open days are held twice a year generally in April and September.

**MQS:** MQS concurs with the OEH above.

MQS further notes the large amount of environmental information made available on the Q Station Website as well as the documents lodged with Manly Library in accordance with the Conditions of Approval.

**Objective evidence**

- QSCC Agenda
  - QSCC Minutes
  - MQS Sustainability Policy 2007 available online:  
<http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>
  - IMAMS Policy 2006 available online:  
<http://www.qstation.com.au/pdfs/070803IMAMSFinal.pdf>
  - IMAMS Bi-annual Report April – December 2008 Available online:  
<http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf>
  - Quarantine Station Plans of Management Available online:  
<http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm>
  - Visitor Information
-

- Visitor Literature
- Environmental information displays on site
- Community Open Day Questionnaires

**Notes**

See Question 7.1.3. While many of these reports are required by the CoA, both OEH and MQS have a record of providing information to the public and particularly to the QSCC at a level which goes well beyond regulatory obligations.

**Recommendations – Ranking: N**

There is no recommendation.

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## 18.2 Mandatory Reports

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### Question 18.2.1

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*Do the co-proponents comply with the requirement that all final reports, reviews, plans and monitoring data referred to in the conditions of approval are to be publicly available, with the exception of material that is commercially sensitive or contains sensitive information regarding Aboriginal heritage or the location of threatened species and/or their habitat?*

- Yes  
 No

**Category:** Regulatory Requirement

**Rating:** 20

**Score:** 20

**Application:** Construction and Operational Phases

**Responsibility:** Joint

#### Management Assertion

**OEH:** Approved final reports; reviews; plans; and monitoring data are made publicly available through the following distribution channels:

- Copies of final reports, reviews, plans and monitoring data are publicly available at the OEH Quarantine Station Site Office (building S7)
- Site wide plans are available at [Manly Library](#)
- Certain site wide plans can be downloaded on the [OEH website](#)
- Links to various plans and reports are available on the [Q-station website](#)
- The QSCC are provided with copies of the monitoring reports biannually
- The QSCC are currently involved in the review of eleven site-wide plans

**MQS:** MQS concurs with the OEH above and further notes that MQS works with the OEH in relation to the above, for example MQS and OEH are currently planning the Community Open Day to be held in April 2012.

MQS notes that sensitive material contained in reports or monitoring data is not made publicly available.

#### Objective evidence

- Item 3: Co-proponents review of site wide plans
  - QSCC Agenda
  - QSCC Minutes
  - MQS Sustainability Policy 2007 available online:  
<http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf>
  - IMAMS Policy 2006 available online:  
<http://www.qstation.com.au/pdfs/070803IMAMSFinal.pdf>
  - IMAMS Bi-annual Report April – December 2008 Available online:  
<http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf>
  - Quarantine Station Plans of Management Available online:  
<http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm>
-

**Notes**

All final reports, reviews, plans and monitoring data referred to in the conditions of approval are made publicly available, except for any necessary excisions relating to material that is commercially sensitive or contains sensitive information regarding Aboriginal heritage or the location of threatened species and/or their habitat.

It was confirmed that publically available does not contain sensitive material which is inappropriate for release.

Also see question 7.1.3

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 18.2.2**

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***Do the co-proponents comply with the requirement to submit an Annual Environmental Report for the project?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Condition of Approval 221 requires that an Annual Environmental Report for the project be prepared by the co-proponents with the exception of the years that coincide with a comprehensive environmental audit. The first Annual Environmental Report was prepared approximately 12 months after the commencement of works at the Quarantine Station. Since this date, the co-proponents have prepared an Annual Environmental Report for the site. The OEH and MQS chose to re-title the Annual Environmental Report the Annual Sustainability Report so as to better reflect the range of environmental, social and economic indicators monitored at the Quarantine Station.

**MQS:** MQS concurs with the OEH above.

**Objective evidence**

- Annual Sustainability Report 2009
- Annual Sustainability Report 2010

**Notes**

Annual Sustainability Reports for both 2009 and 2010 were reviewed. They have been prepared in accordance with the timetable set out in the CoA, and have addressed the requirements within CoA 221, 222, 223, 224.

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**Recommendations – Ranking: N**

There is no recommendation.

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**Question 18.2.3**

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***Have the co-proponents complied with the requirement, as part of the Annual Environmental Report, to produce a monitoring report outlining results from the integrated monitoring program?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Yes, a summary of the monitoring results for the Quarantine Station is included in the Annual Sustainability Report for the site in accordance with the relevant Conditions of Approval. The MQS and OEH also produce a separate monitoring (IMAMS) report biannually.

**MQS:** MQS concurs with the OEH above and notes the correspondence of Alastair Henschman (Director, Metropolitan, Parks and Wildlife Group of the OEH) providing material for the 2010 report.

**Objective evidence**

- Annual Sustainability Report 2009
- Annual Sustainability Report 2010
- IMAMS Bi-annual Report January-June 2011
- IMAMS Bi-annual Report January-June 2010
- IMAMS Bi-annual Report April – December 2008 Available online:  
<http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf>

**Notes**

Annual Sustainability Reports for 2009 and 2010 were reviewed and found to include a summary of monitoring results and trends collected over time as well as identifying measures taken or to be undertaken in response to any identified adverse environmental impacts which addresses the requirements within CoA 219. In addition, a separate IMAMS monitoring report is produced bi-annually.

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 18.2.4**

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***Have the co-proponents complied with any requirements of the DEC, DIPNR, NSW Heritage Council, NSW Fisheries and Waterways Authority in regard to the outcomes of the annual environmental report?***

- Yes  
 No

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** Stakeholder feedback is sought in regard to the outcomes of the annual environmental (sustainability) report. Stakeholder requirements regarding the outcomes of the annual environmental report are considered by the OEH and MQS. Stakeholder requests have been actioned as appropriate to the site and operations and are a matter for ongoing consultation.

The co-proponents consider the QSCC's recommendations and comments on the annual environmental report and provide a response to the Committee as appropriate.

**MQS:** MQS concurs with the OEH above.

**Objective Evidence**

- Letters to regulators re: Annual Sustainability Report
- QSCC minutes

**Notes**

The QSCC meeting minutes (dated 17/8/2011) were reviewed which demonstrates that the Annual Sustainability Report was tabled at the meeting for the QSCC to discuss, comment and provide feedback. Letters regarding the Annual Sustainability Report sent to regulators listed within CoA 225 (dated 30/11/11) were reviewed. The letter states "on behalf of OEH and MQS, I refer the 2010 Annual Sustainability Reports to your department for review and comment".

**Recommendations – Ranking: N**

There is no recommendation.

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**Question 18.2.5**

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***Have the co-proponents complied with the requirement to consider the recommendations and comments of the Quarantine Station Community Committee and provide a response to the Committee?***

- Yes  
 No
-

**Environmental Audit**

**Category: Regulatory Requirement**

**Rating: 20**

**Score: 20**

**Application:** Construction and Operational Phases

**Responsibility:** Joint

**Management Assertion**

**OEH:** At QSCC meetings, Committee members are presented with the annual environmental report, IMAMS monitoring reports and other Quarantine Station related reviews and reports. At these meetings, the QSCC has the opportunity to provide recommendations, comments and general feedback on the reports/reviews tabled. Typically, the report being presented will be sent out to QSCC members at least two weeks prior to the meeting to allow ample time for members to consider the report and formulate the comments/recommendations they would like to make at the upcoming meeting. OEH and MQS staff attend QSCC meetings and can provide a response to the Committee regarding their comments/recommendations. The QSCC comments and co-proponent responses are recorded in the meeting minutes and any actions arising from the discussion are noted in the meeting minutes to prompt follow up by the appropriate person.

**MQS:** MQS concurs with the OEH above.

**Objective Evidence**

- QSCC minutes
- QSCC agenda

**Notes**

See Question 7.1.5

**Recommendations – Ranking: N**

There is no recommendation.

END OF REPORT

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## Attachment 1

### Documents Reviewed

No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
1	Sustainability Policy for North Head Quarantine Station (last updated 14/6/07) Mawland Quarantine Station Pty Ltd	MQS Sustainability Policy 2007
2	Mawland Quarantine Station Director Declaration of Maxwell Player 19/12/2011	Director Declaration 2011
3	Integrated Monitoring and Adaptive Management System for the adaptive reuse of the Quarantine Station (IMAMS) Policy – Final 15/12/2006	IMAMS Policy 2006
4	Bi-Annual Monitoring Report for the North Head Quarantine Station January 2011 – June 2011 prepared October 2011	IMAMS Bi-annual Report January-June 2011
5	Curriculum Vitae of Maxwell Player	Maxwell Player CV
6	Letter correspondence between Department of Planning and DEC re: Appointment of Environmental Manager Quarantine Station, Sydney Harbour National Park, 10/5/2004  Letter from Robert Black (Director, Urban Assessments Branch) to Jennifer Carter (Manager, Sydney Region) re: NORTH HEAD QUARANTINE STATION – Appointment of Environmental Manager 28/5/2004	Letter correspondence re: Appointment of environmental manager
7	Curriculum Vitae of Siân Waythe	Siân Waythe CV
8	Letter of appointment for Louise O'Flynn to the temporary position of Environmental Performance Manager 9/9/2011	Louise O'Flynn letter of appointment
9	Curriculum Vitae of Louise O'Flynn 2011	Louise O'Flynn CV
10	Mirvac Hotels & Resorts Associate Handbook, November 2011 – Standard Staff Induction Manual	Mirvac Associate Handbook
11	Welcome to QStation Sydney Harbour National Park – Manly, visitor information.	Visitor Information
12	McArthur, S & Cornwall, J. 2008, 'From Quarantine to QSTATION Honouring the Past, Securing the Future' <i>CL Creation, Lane Cove</i>	Visitor Literature
13	Contract Clause required by Condition of Approval 65	Contract Clause under Condition of Approval 65
14	Health Safety Environment Committee Constitution	HSE Committee Constitution
15	Quarantine Station Health Safety and Environment Committee Meeting Minutes	HSE Committee minutes



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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
16	Sustainability Policy for North Head Quarantine Station (last updated 14/6/07) Mawland Quarantine Station Pty Ltd available online: <a href="http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf">http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf</a>	MQS Sustainability Policy 2007 available online: <a href="http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf">http://www.qstation.com.au/pdfs/070619SustPolicy-Draft3.pdf</a>
17	Annual Sustainability Report 2009 Q Station	Annual Sustainability Report 2009
18	Quarantine Station Environment Manager's Quarterly IMAMS Report 1 April – 30 June 2011	IMAMS Quarterly Report April – June 2011
19	Integrated Monitoring and Adaptive Management System for the adaptive reuse of the Quarantine Station (Final 15th December 2006) available online: <a href="http://www.qstation.com.au/pdfs/070803IMAMFinal.pdf">http://www.qstation.com.au/pdfs/070803IMAMFinal.pdf</a>	IMAMS Policy 2006 available online: <a href="http://www.qstation.com.au/pdfs/070803IMAMFinal.pdf">http://www.qstation.com.au/pdfs/070803IMAMFinal.pdf</a>
20	Quarantine Station Community Committee Agenda Meeting 42 date: 6/7/2011  Quarantine Station Community Committee Agenda Meeting 45 date: 15/2/2012  Quarantine Station Community Committee Agenda Meeting 44 date: 16/11/2011	QSCC Agenda
21	Quarantine Station Community Committee Minutes Meeting 42 date: 6/7/2011  Quarantine Station Community Committee Minutes Meeting 44 date: 16/11/2011	QSCC Minutes
22	Bi-Annual Monitoring Report for the North Head Quarantine Station April 2008 – December 2008 Available Online: <a href="http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf">http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf</a>	IMAMS Bi-annual Report April – December 2008 Available online: <a href="http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf">http://www.qstation.com.au/pdfs/conservation/Q%20Station%20Bi-Annual%20Report%203.pdf</a>
23	Q Station Community Involvement & Consultation Available Online: <a href="http://www.qstation.com.au/pdfs/conservation/community_consultation.pdf">http://www.qstation.com.au/pdfs/conservation/community_consultation.pdf</a>	Community Involvement & Consultation Available Online: <a href="http://www.qstation.com.au/pdfs/conservation/community_consultation.pdf">http://www.qstation.com.au/pdfs/conservation/community_consultation.pdf</a>
24	North Head Quarantine Station, Environmental Management Plan 2005	EMP 2005
25	Office of Environment and Heritage (OEH) - Records Management Policy 2011	OEH Records Management Policy 2011
26	Lease between the Minister for the Environment for the State of New South Wales and Mawland Quarantine Station	Lease
27	Wharf Licence between the Minister administering the National Parks and Wildlife Act 1974 and Mawland Quarantine Station Pty Limited	Wharf Licence

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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
28	Letter correspondence between DECC and MQS re: Quarantine Station Contracts 27/3/2008	Letter correspondence re: Quarantine Station Contracts
29	Liquor Licence for Quarantine Station Manly 28/4/2008	Liquor Licence
30	Printout of OEH Compliance Rectification Database	OEH Compliance Rectification Database printout
31	North Head Quarantine Station Environment Manager's six monthly status report – Number 9, November 2010 – April 2011	OEH Environment Manager's six monthly status report
32	North Head Quarantine Station, Environmental Management Plan 2005 - Appendices	EMP Appendices 2005
33	Environment Management Plan Implementation Database Environment and Planning Printout	EMP Implementation Database printout
34	North Head Quarantine Station Conservation and Adaptive Re-use, Draft Environmental Management Plan 2011	Draft EMP 2011
35	Department of Environment, Climate Change & Water, Position Description for Environment Manager	Environment Manager Position Description
36	Mirvac HSE Roles & Responsibilities, Position Description - All Other Mirvac Employees for Rupak Adhikari, 24/11/2011	General position description for all Mirvac employees
37	Mirvac HSE Roles & Responsibilities, Position Description – Department Manager for Alexander Farrel, 2/12/2011	Position description – Mirvac Department Manager
38	Mirvac HSE Roles & Responsibilities, Position Description – Supervisor for Nicola Bowers, 25/3/2011	Position description – Mirvac Supervisor
39	Mirvac position description – Demi Chef, September 2009	Mirvac position description – Demi Chef
40	Mirvac HSE Consultation Statement, September 2009	Mirvac HSE Consultation Statement
41	National Parks and Wildlife Service, Position Description - Ranger	NPWS Position Description - Ranger
42	Minutes Quarantine Station Conservation and Adaptive Reuse Project – Lease Control Meeting 12/9/2011  Minutes Quarantine Station Conservation and Adaptive Reuse Project – Lease Control Meeting 4/10/2011  Minutes Quarantine Station Conservation and Adaptive Reuse Project – Lease Control Meeting 16/01/2012	Lease Control Meeting Minutes
43	Curriculum Vitae of Todd Durrant	Todd Durrant CV
44	Site Property Manager, Position Description, December 2007	Position Description – Site Property Manager

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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
45	Work Cover New South Wales – Occupational Health and Safety Induction Training for Construction Work, Todd Durrant, 26/6/2000  WorkCover New South Wales, Course in OHS Consultation, Todd Durrant, 22 <sup>nd</sup> , 23 <sup>rd</sup> July & 7 <sup>th</sup> , 8 <sup>th</sup> August 2002	Todd Durrant Induction Records
46	Curriculum Vitae of Helen Drew	Helen Drew CV
47	Email correspondence between Helen Drew and James Riley RE: VS Manager position  Q Station Application Form for Helen Drew  Enrolments status for Helen Drew last updated 16/12/2011	Helen Drew Induction Records
48	Curriculum Vitae of Rachel Lawrence	Rachel Lawrence CV
49	Mirvac Hotels & Resorts, Human Resources Forms – New Associate Induction and Orientation Program Checklist for Rachel Lawrence  Enrolments status for Rachel Lawrence last updated 16/12/2011	Rachel Lawrence Induction Records
50	Q Station website <a href="http://www.qstation.com.au/index.php">http://www.qstation.com.au/index.php</a>	Q Station website
51	Paul Davies Pty Ltd – Architects Heritage Consultants Curriculum Vitae	Paul Davies CV
52	Quarantine Station Audit Final Report - Appendix B, 2007 by GHD	2007 Audit Report
53	Letter of Approval for IMAMS from DEC (now OEH) (dated 29/3/2007)	DEC letter of approval for IMAMS
54	Proposed Long-nosed Bandicoot Habitat Enhancement Map and methodology	Long-nosed Bandicoot Habitat Enhancement Map and methodology
55	Letter of Approval for IMAMS from Department of Planning (dated 28/5/2007)	Department of Planning letter of approval for IMAMS
56	Quarantine Station Induction Register	Induction Register
57	Induction Program – Outline of the Induction Program, Table 1.1.1 Allocation of Induction Program modules to different participants	Induction Program
58	North Head Quarantine Station Induction, Declaration Form	Q Station Induction Declaration Form
59	OEH Trainer Record Template	Trainer Record template
60	Curriculum Vitae of Suzanne Stanton	Suzanne Stanton CV
61	Annual Monitoring Report for the North Head Quarantine Station January 09 – December 2009	Annual Monitoring report 2009

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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
62	NPWS Property Services Meeting Minutes 3/08/2011	Property Services Meeting Minutes
63	Lease Control Meeting Agenda, 16/01/2012	Lease Control Meeting Agenda
64	Quarantine Station Plans of Management are available to view online at: <a href="http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm">http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm</a>	Quarantine Station Plans of Management Available online: <a href="http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm">http://www.environment.nsw.gov.au/parkmanagement/QuarantineStationPlan.htm</a>
65	Q Station Retreat telephone number available in the white pages online: <a href="http://www.whitepages.com.au/busSearch.do?subscriberName=Q+Station+Retreat&amp;location=Sydney+CBD+NSW">http://www.whitepages.com.au/busSearch.do?subscriberName=Q+Station+Retreat&amp;location=Sydney+CBD+NSW</a>	Q Station telephone number white pages online: <a href="http://www.whitepages.com.au/busSearch.do?subscriberName=Q+Station+Retreat&amp;location=Sydney+CBD+NSW">http://www.whitepages.com.au/busSearch.do?subscriberName=Q+Station+Retreat&amp;location=Sydney+CBD+NSW</a>
66	Q station contact details located on Q station website: <a href="http://www.qstation.com.au/contact.php">http://www.qstation.com.au/contact.php</a>	Q station contact details located on Q station website: <a href="http://www.qstation.com.au/contact.php">http://www.qstation.com.au/contact.php</a>
67	Information Management System – Geographical Information System Outline October 2007 Version 1	IMS/GIS outline
68	Information Management System – Geographical Information System Outline Review action status database	IMS/GIS outline review action status database
69	Quarantine Station Community Committee Meeting 44 Item 3: Co-proponents review of site wide plans	Item 3: Co-proponents review of site wide plans
70	Project Plan Quarantine Station Site wide plan review	Project Plan – Site wide plan review
71	Declaration of Corporate Counsel Suzanne Stanton 2/2/2012	Declaration of Corporate Counsel Suzanne Stanton
72	Cultural Heritage Strategic Policy Conserving Heritage – Connecting Cultures December 2006	Cultural Heritage Strategic Policy
73	Conservation Works Program for the North Head Quarantine Station (Final Draft June 2006)	CWP
74	Noise Management Plan for the North Head Quarantine Station May 2005	Noise Management Plan
75	Heritage Landscape Management Plan Including a Heritage Landscape Masterplan and Inscriptions Conservation Management Plan MAY 2006	Heritage Landscape Management Plan
76	Waste Management Plan for the adaptive re-use of the Quarantine Station May 2005	Waste Management Plan
77	Visitor Management Plan for the North Head Quarantine Station (March 2005)	Visitor Management Plan
78	Site wide plan review action status database – heritage landscape management plan section	Site wide plan review action status database – heritage landscape management plan section
79	Quarantine Station Moveable Heritage & Resource Collections Management Plan February 2007	Moveable Heritage & Resource Collections Management Plan

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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
80	Quarantine Station Site Wide Plan Review 2011 – Moveable Heritage and Resource Collection Plan	Moveable Heritage and Resource Collection Plan Review coversheet
81	Quarantine Station Site Wide Plan Review 2011 – Heritage Landscape Management Plan	Heritage Landscape Management Plan review coversheet
82	Interior Fitout Plan – Part 2 January 2007	Interior Fitout Plan – Part 2
83	North Head Aboriginal Site Management Report 2007	Aboriginal Site Management Report
84	Action Status Database for Aboriginal Site Management Report	Action Status Database - Aboriginal Site Management Report
85	Quarantine Station Site Wide Plan Review 2011 – Aboriginal Site Management Report	Aboriginal Site Management Report Review coversheet
86	Quarantine Station Site Wide Plan Review 2011 – Infrastructure Control Plan	Infrastructure Control Plan Review coversheet
87	Erosion and Sedimentation Control Plan May 2005	Erosion and Sedimentation Control Plan
88	Contractor Certificate of Dangerous Goods for the decommissioning of underground storage tank adjacent to building A6 23/10/2003	Decommissioning certificate for underground storage tank adjacent to building A6
89	Asbestos Removal Clearance Certificate for building H1 and H2 – 30/5/2002	Asbestos Removal Clearance Certificate for building H1 and H2
90	Site Inspection Register	Site Inspection Register
91	North Head Bandicoot Mortality Register	North Head Bandicoot Mortality Register
92	Bandicoot foraging habitat monitoring field sheet dated 11/11/11	Bandicoot foraging habitat monitoring field sheet
93	Bandicoot habitat database summary – Bandicoot habitat usage	Bandicoot habitat usage database
94	Annual Monitoring Report for the North Head Station, January 2010 – December 2010	Annual Monitoring Report 2010
95	Predator and Pest Animal Plan 2008 (front cover, contents page and approval)	Predator and Pest Animal Plan
96	Predator and Pest Animal Plan action status database 2011	Predator and Pest Animal Plan action status database
97	Fox, Cat and Rabbit abundance database monitoring results	Fox, Cat and Rabbit abundance database monitoring results
98	Quarantine Station Site Wide Plan Review 2011 – Predator and Pest Animal Plan	Predator and Pest Animal Plan review coversheet
99	Protecting Manly's Little Penguins, Critical Habitat for an endangered population - Brochure	Little Penguin information brochure
100	Email correspondence between MQS and OEHL regarding QS wharf upgrade.	Email correspondence between MQS and OEHL regarding QS wharf upgrade.
101	Quarantine Station Site Wide Plan Review 2011 – Visitor Management Plan	Visitor Management Plan Review coversheet
102	Q Station Sleepover Policy	Q Station Sleepover Policy

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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
103	Infrastructure Control Plan – Part 1 Including Outdoor Visitor Infrastructure Plan February 2008	Infrastructure Control Plan
104	Mirvac National Greenhouse Reporting Scheme data form – Energy Usage Survey For the Period 1 April 2011 to 30 June 2011	Mirvac National Greenhouse Reporting Scheme data form
105	Property Inspection Report	Property Inspection Report
106	Mirvac Purchase Order Policy September 2009	Mirvac Purchase Order Policy
107	Mirvac Corporate Responsibility and Sustainability Policy 5/12/2011	Mirvac Corporate Responsibility and Sustainability Policy
108	Office of Environment & Heritage - Minor Works Contract	OEH Minor Works Contract
109	OEH Procurement manual – 3/6/2011	OEH Procurement manual
110	Waste Reduction and Purchasing Policy – A guide for agencies. September 1997, EPA	Waste Reduction and Purchasing Policy – A guide for agencies
111	Q-Station General Incident Reporting Form	General Incident Reporting Form
112	Mirvac Group Emergency Response Procedure	Mirvac Emergency Response Procedure
113	BCA Assessment Works Certificate Application Building P1 – Accommodation Block	Works Certificate Application Building P1 – Accommodation Block
114	Compliance Rectification Requirement 07/006 Response by Lessee Issue: Notice of intention to issue an order – Inoperable fire hydrants 17/4/2007	Compliance Rectification Requirement RE: inoperable fire hydrants
115	Mirvac Dangerous Goods Storage Guidelines	Mirvac Dangerous Goods Storage Guidelines
116	Mirvac Group Hazardous Substances & Dangerous Goods Management Procedure	Mirvac Hazardous Substances & Dangerous Goods Management Procedure
117	Mirvac Group Spill Management Procedure	Mirvac Spill Management Procedure
118	DECCW Audit of Sewage Management Facilities (water pollution control) July 2010 (Section 9 – North Head Quarantine Station – Sydney Harbour National Park Detailed Report)	DECCW Audit of Sewage Management Facilities Report
119	North Head Quarantine Station – Sydney Harbour National Park – OEH response to sewage audit findings	OEH response to sewage audit findings
120	Q-Station Significant Incident Reporting Form	Significant Incident Reporting Form
121	Q-Station Induction Program Module 5 Emergency and Incident Management	Module 5 of Induction Program
122	Protocol for the management of activities that are potentially non-compliant with the Quarantine Station lease, Conditions of Approval or other Legislative Obligations'	Compliance Rectification process

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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
123	A review of the monitoring program for the North Head Quarantine Station – Report to Mawland Quarantine Station By Tony Griffin School of Leisure, Sport and Tourism University of Technology, Sydney – June 2011	IMAMS Review
124	OEH letter to MQS re: Repsonse to A Review of the Monitoring Program for the North Head Quarantine Station	OEH letter to MQS re: response to IMAMS review
125	Memo to: Peter Todman, Geoff Perrie From: Sian Waythe RE: Quarantine Station Lease Compliance Report and Environment manager's Report 29/8/2011	Lease/Contract Compliance Report – Bi-annual
126	NPWS – Quarantine Station Site Inspection Checklist	Site inspection checklist
127	Bandicoot habitat usage – rehabilitated sites Bandicoot habitat usage – combined control sites Little penguin active breeding burrows Native fauna road deaths	Monitoring indicator databases
128	Nutri-Tech Solutions, Soil pH and Moisture Meter information sheet 28/11/08	Soil pH and Moisture Meter information sheet
129	Monitoring & IMAMS reporting requirements spreadsheet	Monitoring & IMAMS reporting requirements spreadsheet
130	Quarantine Station Lease Compliance Database	OEH Q-Station Lease Compliance Database
131	Quarantine Station Lease Compliance Database 2012	Revised OEH Q-Station Lease Compliance Database
132	Standard lease compliance rectification letter	Standard lease compliance rectification letter
133	Protocol for the management of activities that are potentially non-compliant with the quarantine station lease, conditions of approval, or other legislative obligations.	non-compliance Management protocol
134	Compliance Rectification Requirement 07/017	Compliance Rectification Requirement 07/017
135	DECCW Quarantine Station Environment Manager Annual IMAMS Data Reporting Form	Annual IMAMS Data Reporting Form
136	Community relations – public reaction – Quarantine station conservation and adaptive re-use project – Complaints	Complaints register
137	Park Management – Incidents – Quarantine Station Conservation and Adaptive Reuse Project Incident Register Harbour North Area	Incident Register
138	Entire site wide plan review action status database as at 2/2/2012	Entire Site wide plan review action status database
139	Quarantine Station Site wide plan review 2011 Environmental Management Plan (EMP)	EMP review coversheet

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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
140	Parks and Wildlife Group response to the Auditors recommendations	OEH response to 2007 Audit recommendations
141	Email correspondence between Environmental Performance Manager and Acting Manager of Visitor Facilities and Services section re: Quarantine Station site wide plan review	Email correspondence re: Quarantine Station site wide plan review
142	Annual Sustainability Report 2010 Q Station	Annual Sustainability Report 2010
143	Bi-Annual Monitoring Report for the North Head Quarantine Station January – June 2010	IMAMS Bi-annual Report January-June 2010
144	Letters to regulators including Environment Protection Authority (EPA); NSW Maritime Authority; Government Land and Social Projects Assessment; Department of Primary Industries (Fisheries); Office of Environment and Heritage, Re: North Head Quarantine Station 2010 Annual Sustainability Report	Letters to regulators re: Annual Sustainability Report
145	Determination Report Template – Review of environmental Factors determination report	REF determination report for the demolition of sheds and walking tracks
146	North Head Precinct Fire management Strategy 2009 - 2014	North Head Bushfire Management Strategy
147	Approval and adoption of the North Head precinct fire management strategy, Sydney Harbour National Park and surrounds, 13/9/2011	North Head Bushfire Management Strategy Approval
148	Is a REF required? – Summary guide	REF summary guidelines
149	DECCW - Proponents Guidelines for the Review of Environmental Factors	Proponents Guidelines for the Review of Environmental Factors
150	Personnel and training records viewed on site	Personnel and training records viewed on site
151	Environmental information displays on site	Environmental information displays on site
152	Risk Control by Job Safety Analysis (JSA) procedure	OEH JSA Procedure
153	OHS Risk Management System NPWS Job Safety Analysis	OEH JSA
154	TRIM files inspected at OEH Quarantine Station site office	TRIM files inspected at OEH Quarantine Station site office
155	Application under S60 of the NSW Heritage Act 1977 (31/3/2006)	S60 approval for reconstruction of H1 and P22
156	National Parks and Wildlife Act 1974 Sec151B	National Parks and Wildlife Act 1974 Sec151B
157	Draft Plan of Management for Sydney Harbour National Park	Draft Plan of Management for Sydney Harbour National Park
158	Quarantine Station Reconstruction of Buildings H1 and P22 – Works certificate approval	Works certificate approval



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No	DOCUMENT TITLE	CITATION (as referred to in Audit Report)
159	Department of Environment and Conservation and Mawland Hotel Management Pty Ltd <i>Preferred Activity Statement 2003</i>	PAS
160	Mirvac Sustainability Requirements for Suppliers – Supplier Questionnaire	Mirvac Sustainability Requirements for Suppliers

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## Attachment 4

### Stakeholder Consultation Report

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#### Consultation Process

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In accordance with CoA Condition 230, a draft version of this Environmental Audit Report was provided to stakeholder organisations including relevant Government agencies and the QSCC for comment on 5<sup>th</sup> April 2012. The agencies consulted included all of the agencies specified in Condition 230, or their successor organisations.

In accordance with Condition 231, a period of 6 weeks was allowed for comment, with an extension of time being agreed for the QSCC. All comments were provided in writing.

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#### Stakeholder Responses

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The following table lists the organisations invited to comment, and outlines the nature of the comments provided.

Organisations' comments are included in full at the end of this report.

Stakeholder	Date of Comments	Nature of Comments
Mawland Quarantine Station	11 April 2012	No substantive comments.
Department of Primary Industries – Fisheries	11 April 2012	Specific comment in relation to seagrass.
Roads and Maritime Services – Maritime Division	11 April 2012	No substantive comments.
Office of Environment and Heritage – NSW National Parks & Wildlife Service	17 May 2012	Comments on audit recommendations focusing on the role of OEH in implementing the recommendations. Comments and points of clarification in relation to specific audit recommendations. General comments on audit findings, particularly in relation to future directions for possible revision of the EMP and CoA.
NSW Heritage Council	22 May 2012	Notes that reconstruction of buildings P21 and P23 for the purpose of educational accommodation within the 3rd Class/Asiatic precinct has been approved. Comments on need for focus to move to future maintenance, repair and conservation work to the buildings on the site through development of a Cyclical Maintenance Program.
Department of Planning & Infrastructure	25 May 2012	No substantive comments.

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**Environmental Audit**

<b>Stakeholder</b>	<b>Date of Comments</b>	<b>Nature of Comments</b>
Quarantine Station Community Committee	3 June 2012	General comments in relation to: <ul style="list-style-type: none"><li>• Public access to the site</li><li>• Access to the moveable heritage collection</li><li>• Re-vegetation</li><li>• Weed control</li><li>• Water-based access to the site</li></ul> Comments in relation to planning and monitoring processes. Specific comments relating to areas of the Audit Report where these general comments are addressed.

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**Consideration of Comments by the Auditor**

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Condition 232 requires that the auditor shall consider comments received through the stakeholder consultation process in preparing a final audit report.

It is the general view of stakeholders that, in the words of the QSCC:

“the Conservation and Adaptive Re-use of the site is being successful and that the environmental and heritage values of the Quarantine Station have in general been appropriately conserved, maintained and in many cases improved over the last 5 years.”

It is also recognised that the site “has transitioned from a restoration and construction phase into a maintenance and efficiency improvement phase”, and that some changes in regulatory arrangements and management systems may be needed to address this.

A number of stakeholder comments relate to policy directions that the stakeholder(s) would prefer to see adopted in relation to the future management of the site. It is not the role of the auditor to adjudicate in relation to comments of this type, but they are made available through this report for the consideration of OEH and MQS.

Some comments relate to particular issues addressed in the report. Where appropriate, the auditor has made amendments to the draft report to take account of such comments. Sections of the report where amendments have been made, along with the stakeholders whose comments gave rise to the amendments, are listed in the table below.

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North Head Quarantine Station  
Conservation and Adaptive Reuse Project

**Environmental Audit**

<b>Section Amended</b>	<b>Stakeholder</b>
Executive Summary – Condition of the Site	Quarantine Station Community Committee
Question 1.7	Quarantine Station Community Committee
Question 1.8	Quarantine Station Community Committee
Question 1.9	Quarantine Station Community Committee
Question 4.6	Office of Environment and Heritage – NSW National Parks & Wildlife Service
Question 10.2.6	NSW Heritage Council
Question 10.2.18 Recommendation 10.2.18	NSW Heritage Council
Question 10.3.3	Office of Environment and Heritage – NSW National Parks & Wildlife Service
Question 10.5.1	Office of Environment and Heritage – NSW National Parks & Wildlife Service
Question 10.6.2	Department of Primary Industries – Fisheries

Some comments have been made in relation to the application of the audit scoring system. As indicated in the Executive Summary, the scoring system is designed to provide only general guidance on the level of conformance with audit requirements and improvements in performance over time. Because this audit primarily relates to compliance with regulatory requirements, the auditor's practice has been to allocate scores on an "all or nothing" basis. In some instances this may not give credit for partial compliance with a requirement. A more important issue is that stakeholders may have differing views about the importance of particular compliance requirements, and might wish to rate some issues more highly in evaluating performance. In spite of these limitations, the auditor considers that the high and increased score achieved in this audit is reflective of the environmental management of the site.

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