


# NORTH HEAD QUARANTINE STATION

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COMPREHENSIVE AUDIT 2018 - 2021

FEBRUARY 2022

## Authorisation

|                     |   |                             |   |
|---------------------|---|-----------------------------|---|
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| <b>Date:</b>        | 30/05/22  | <b>Date:</b>                | 30/05/22  |

## Document Revision History

| Revision | Date     | Details  |
|----------|----------|--|
| 0.1      | 21/02/22 | Preliminary draft for co-proponent review  |
| 0.2      | 14/03/22 | Updated draft incorporating co-proponent review and issued for agency consultation |
| 1.0      | 30/05/22 | Update in consideration of stakeholder feedback on Rev 0.2                         |

**Report Name:** North Head Quarantine Station Comprehensive Audit 2018 - 2021

**Project No.:** 372

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## ABBREVIATIONS / GLOSSARY

| Abbreviation/Term | Description   |
|-------------------|---|
| CoA               | Condition of Approval   |
| Co-proponents     | Mawland Hotel Management Pty Ltd and National Parks and Wildlife Service                    |
| DACMP             | Detailed Area Conservation Management Plan  |
| DPE or Department | Department of Planning and Environment  |
| DEC               | Former Department of Environment and Conservation (now the NPWS)                            |
| DIPNR             | Former Department of Infrastructure, Planning and Natural Resources (now DPE)               |
| DPI               | Department of Primary Industries (formerly Fisheries NSW)                                   |
| EPA               | Environment Protection Authority  |
| EIS               | Environmental Impact Statement  |
| EMP               | Environmental Management Plan   |
| EP&A Act          | <i>Environmental Planning and Assessment Act 1979 (NSW)</i>                                 |
| GIS               | Geographic Information System   |
| IAPAR             | Independent Audit Post Approval Requirements  |
| Km/h              | Kilometres per hour   |
| Mawland           | Mawland Hotel Management Pty Ltd  |
| NSW               | New South Wales   |
| NPWS              | NSW National Parks and Wildlife Service   |
| OEH               | Office of Environment and Heritage  |
| PAS               | Preferred Activity Statement  |
| the Project       | The Development as described in the EIS and approved in the Determination Report, MP08_0041 |
| QSCCC             | Quarantine Station Community Consultative Committee   |
| QSCMP             | North Head Quarantine Station Conservation Management Plan (NPWS 2000b)                     |
| SIS               | Species Impact Statement  |
| TfNSW             | Transport for New South Wales (formerly NSW Waterways Authority)                            |
| WolfPeak          | WolfPeak Pty Ltd  |

## EXECUTIVE SUMMARY

WolfPeak Pty Ltd (WolfPeak) was engaged by New South Wales National Parks and Wildlife Service (NPWS) on behalf of their co-proponent Mawland Quarantine Station Pty Ltd (Mawland) to carry out the 2018-2021 comprehensive audit of the North Head Quarantine Station (the 'Q Station' or the 'Project'), located at 1 North Head Scenic Drive, Manly, New South Wales (NSW) 2095.

Mawland Quarantine Station Pty Ltd (Mawland) has a lease agreement with NPWS under the *National Parks and Wildlife Act 1974*, LPI Dealing No. AC928975B executed on 26 October 2006 to operate the Q Station.

The North Head Quarantine Station Conservation and Adaptive Re-use Proposal prepared for Clause 243 under Part 5 of the *Environment Planning and Assessment Act 1979* Joint Determination Report (the 'Determination Report', Reference MP08\_0041)) was approved by the determining authorities the NSW Minister for the Environment, NSW Heritage Council and NSW Waterways Authority in December 2003.

A Direction [Direction 3] from the Department of Planning Industry and Environment (the 'Department') to NPWS dated 8 November 2021 directed NPWS to prepare, by 1 June 2022, a comprehensive audit report for the period 1 July 2018 to 31 December 2021 that is consistent with Conditions of Approval (CoA) 226-233 and the Department's document entitled *Independent Audit Post Approval Requirements*, May 2020 (IAPAR). Schedule 1, CoA 226 to 233 of MP08\_0041 sets out the requirements for this comprehensive audit.

This Audit Report presents the findings from the fourth audit, covering the period from 1 July 2018 to 31 December 2021 (the "Audit Period"). Schedule 1, CoA 228 of MP08\_0041 requires a comprehensive audit every five years. The previous audit report (SNC Lavalin, 2018) provided for an "additional year and a half to the EOFY 2018". Accordingly, Direction 3 reduces the current audit period by a year and a half.

Five findings from the previous audit were closed while five findings remained open during the audit period.

Whilst this this the fourth audit it is the first to assess compliance with all of the CoAs as requested by Direction 3. The findings therefore reflect a level scrutiny not previously applied by the previous audits. In relation to MP08\_0041 the following was identified:

- A total of 289 CoAs from Schedules 1 through 9 were assessed.
- A total of 161 CoAs were compliant.
- A total of 33 CoAs were non-compliant.
- A total of 95 CoAs were not triggered.
- A total of 22 CoAs (classified as either compliant or not triggered) had observations identified.

The findings were typically of an administrative compliance nature (i.e., related to out-of-date plans, absence of GIS system, incomplete monitoring records, poorly integrated systems and processes, poorly defined accountabilities and responsibilities for implementation of CoA etc).

There were only a small number of findings made with the potential for low environmental or community impacts.

Management plans are generally dated 2003 – 2008. An internal review of some plans had been conducted in 2010, 2011 and 2012; however, this review had not progressed to having the plans formally updated, reviewed by their co-proponent and any relevant stakeholder and then submitted for approval by the Department.

Given their age the management plans include references to now outdated proposed forecasts and activities for the Q Station (e.g. waste predications for operations, proposed car numbers) as well as superseded legislation and guidance documents. The plans also lack formal document control to allow the reader to understand when and what updates occurred. Some plans are presented as draft or final draft.

Elements of the plans appear to be implemented on an ad-hoc basis; however, given their age and references to proposed activities (such as construction), specific mitigation measures were difficult to assess. The structure of management plans could be improved so as to highlight management actions that can be easily identified, implemented and reported and audited against.

Given over 15 years of operations has occurred since the management plans were prepared a comprehensive review of all management plans should be conducted to verify that they align with current legislative requirements, site conditions and arrangements, roles and responsibilities and objectives and targets.

It is noted that the co-proponents are aware that the plans require a comprehensive update and it was reported that recent discussions had been held in February 2022 with the Department to discuss this issue. The parties intend to commit to each other and the Department to conduct a full review of the Site Wide and other plans referred to in this document before the end of 2022, in conjunction with the new Purchaser of the Lease and Business to create flexible, living and modern documents which will enhance the site's use.

The Auditor considers there to be three overarching reasons for the number of findings identified in the comprehensive audit.

1. Confusion concerning the responsibility and accountability of MP08\_0041 requirements between the co-proponents. The co-proponents do not share a document management system making it difficult for both parties to access and share key operational and compliance documentation which also results in a lack of transparency as to what the other proponent is doing. This makes any collaborative process cumbersome as the public and private nature of the arrangement means both parties have to operate in accordance with their own policies, procedures and operating systems.
2. Until Direction 3 was issued by the Department on 8 November 2021 previous Comprehensive Audit Reports and Annual Environmental Reports did not fully address overall compliance with MP08\_0041. The acceptance and limited feedback concerning these previous reports by the relevant government agencies and stakeholders may have been construed by the co-proponents that compliance with the MP08\_0041 was being achieved and that there were no issues of concern from a regulatory point of view.
3. Many of the findings stem from not having reviewed the originally approved management plans and sought the necessary re-approval of those revised plans from

the relevant agencies. This is essentially an administrative and responsibilities allocation issue related also to points 1 and 2 above.

# 1. INTRODUCTION

## 1.1 Audit background

WolfPeak Pty Ltd (WolfPeak) was engaged by New South Wales National Parks and Wildlife Service (NPWS) on behalf of their co-proponent Mawland Quarantine Station Pty Ltd (Mawland) to carry out the 2018-2021 comprehensive audit of the North Head Quarantine Station (the 'Q Station' or the 'Project'), located at 1 North Head Scenic Drive, Manly, New South Wales (NSW) 2095.

The North Head Quarantine Station Conservation and Adaptive Re-use Proposal prepared for Clause 243 under Part 5 of the *Environment Planning and Assessment Act 1979* Joint Determination Report (the 'Determination Report', Reference MP08\_0041)) was approved by the determining authorities the NSW Minister for the Environment, NSW Heritage Council and NSW Waterways Authority in December 2003. To meet this requirement, WolfPeak was engaged on 15 October 2021 to carry out the comprehensive report of MP08\_0041.

Schedule 1, Conditions of Approval (CoA) 226 to 233 of MP08\_0041 sets out the requirements for this audit.

This is the fourth audit to be conducted and this Report presents the findings under the requirements of Schedule 1 to 9 of MP08\_0041.

### 1.1.1 Agency changes

It is noted that since the MP08\_0041 was approved in 2003 the determining authorities and other government agencies/departments referenced in the document have since changed name. Table 1 presents a summary of name changes since MP08\_0041 was approved in 2003. For the purposes of this Report current agency names will be referenced.

*Table 1: Agency name changes*

| Name Referenced in MP08_0041   | Current Name   |
|--|--|
| Department of Environment and Conservation (DEC)                     | National Parks and Wildlife Service (NPWS) <sup>1</sup>        |
| Department of Infrastructure, Planning and Natural Resources (DIPNR) | Department of Planning and Environment (DPE or the Department) |
| NSW Waterways Authority  | Transport for NSW (TfNSW)                                      |
| NSW Fisheries  | Department of Primary Industries (DPI)                         |
| Office of Environment and Heritage                                   | Heritage NSW <sup>2</sup>                                      |

Notes:

1. Refer Cl. 243 of the Determination Report and email from the Department dated 14 February 2022, as advised by NPWS on 8 March 2022.
2. As advised by NPWS on 8 March 2022.

## 1.2 Audit scope

A Direction [Direction 3] from the Department to the co-proponents dated 8 November 2021 directed them to prepare, by 1 June 2022, a comprehensive audit report for the period 1 July 2018 to 31 December 2021 that is consistent Schedule 1, CoA 226-233 and the Department's document entitled *Independent Audit Post Approval Requirements, May 2020 (IAPAR)*.

Schedule 1, CoA 229 of MP08\_0041 requires that the audit shall address, but not be limited to:

- The environmental performance of the activity and its effects on the environment
- Compliance by the co-proponents with the CoA
- The adequacy of the integrated monitoring program and Environmental Management Plan (EMP)
- 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
- Consideration of the key impact predictions made in the Environmental Impact Statement (EIS) and Preferred Activity Statement (PAS) using information from the integrated monitoring program
- The adequacy and functioning of the information management and GIS system (Schedule 1, CoA 66 -69); and
- Any other matters considered necessary by the Department, Heritage NSW or TfNSW.

The audit was also conducted and carried out in accordance with the requirements set out in Section 3.1 of the of IAPAR as required by Direction 3. The scope of the Independent Audit comprises:

- an assessment of compliance with:
  - all conditions of consent applicable to the phase of the development that is being audited
  - all post approval and compliance documents prepared to satisfy the conditions of consent, including an assessment of the implementation of Environmental Management Plans and Sub-plans; and
  - all environmental licences and approvals applicable to the development excluding environment protection licences issued under the Protection of the Environment Operations Act 1997.
- a review of the environmental performance of the development, including but not necessarily limited to, an assessment of:
  - actual impacts compared to predicted impacts documented in the environmental impact assessment
  - the physical extent of the development in comparison with the approved boundary

- incidents, non-compliances and complaints that occurred or were made during the audit period
  - the performance of the development having regard to agency policy and any particular environmental issues identified through consultation carried out when developing the scope of the audit; and
  - feedback received from the Department, and other agencies and stakeholders, including the community or Community Consultative Committee (if there is one for the Project), on the environmental performance of the project during the audit period
- the status of implementation of previous Independent Audit findings, recommendations and actions (if any)
  - a high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
  - any other matters considered relevant by the auditor or the Department, taking into account relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

Consistent with Schedule 1, CoA 226 and the IAPAR the Audit was conducted in a manner consistent with *AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems*.

In accordance with Schedule 1, CoA 230-232, a copy of the draft report was made available to the following stakeholders for their review and comment prior to finalisation:

- The Department
- EPA
- TfNSW
- NSW Department of Primary Industries (DPI) (formerly NSW Fisheries)
- Heritage NSW; and
- Quarantine Station Community Consultative Committee (QSCCC)

Refer to Section 3.2.5 for details.

The physical boundaries of the audit were defined by the Project Approval area, which is outlined in MP08\_0041 and Figure 1.

### 1.3 Audit period

This audit covers the period from 1 July 2018 to 31 December 2021 (the “Audit Period”). While CoA 228 requires a comprehensive audit every five years, the previous audit report (SNC Lavalin, 2018) provided for an “*additional year and a half to the EOFY 2018*”. Accordingly, Direction 3 reduces the current audit period by a year and a half.



## 1.4 Audit team

In accordance with Section 3.1 of the IAPAR the audit was conducted by a qualified, experienced and independent team whose appointment has been endorsed by the NSW Planning Secretary. No technical specialists were required by the CoCs to support the Auditor.

The audit team comprised of the following personnel, as approved by the NSW Planning Secretary (letter dated 30 November 2021 presented in Appendix D).

- Nick Ballard, Lead Auditor: Exemplar Global Certified Environmental Lead Auditor (Certificate No 129713).<sup>1</sup>
- Derek Low (Auditor): Master of Environmental Engineering Management, Exemplar Global Certified Principal Environmental Auditor (Certificate No 114283).

Signed auditor declarations are also included in Appendix E, as required by the IAPAR.

## 1.5 Evidence of compliance

The comprehensive audit included investigation and review of Project files, records and documentation that acted as evidence of compliance (or otherwise) with a compliance requirement or other indicator of environmental performance. Evidence included, but was not limited to:

- Relevant records, documents and reports
- Interviews of relevant site personnel
- Photographs
- Figures and plans; and
- Site inspection of relevant locations, activities and processes.

Documents sighted during the comprehensive audit are referenced as part of the text discussing compliance status in Appendix A.

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<sup>1</sup> Nick Ballard lead the audit between commencement in December 2021 and the preparation of the initial draft Audit Report in February 2022. Nick ended his employment with WolfPeak in February 2022.

## 2. PROJECT OVERVIEW

### 2.1 Project background

The Q Station<sup>2</sup> was in operation from 1833 until 1984. The site covers 31 hectares and contains buildings and facilities of European cultural heritage significance associated with its former use, as well as a number of natural and Aboriginal cultural heritage features. Populations of the endangered Long-nosed Bandicoot and Little Penguin are present on and around the Q Station.

In 1984, the Q Station was transferred to the NPWS which has managed the site on behalf of the public since then.

An Environmental Impact Statement (EIS) was prepared for the Project in 2001 (Manidis Roberts, 2001), along with a Species Impact Statement (SIS) (Gunninah Environmental Consultants, 2001) that addressed the threatened species on-site. The Heritage Council approved the Detailed Area Conservation Management Plans (DACMP). The intended use of the site by the Minister for the Environment the co-proponents was set out in a Preferred Activity Statement (PAS). In December 2003 the Determining Authorities approved a proposal for the conservation and adaptive reuse of the North Head Quarantine Station at Manly.

Mawland has a lease agreement with NPWS under the *National Parks and Wildlife Act 1974*, LPI Dealing No. AC928975B executed on 26 October 2006. Any variations to the lease are registered with NSW Land and Property Information. The NPWS Director Visitor Engagement and Revenue is the delegate/landlord for the Site and the Visitor Engagement and Revenue Branch manages the leasing issues for NPWS. The co-proponents share responsibility and accountability for the requirements of MP08\_0041. Conservation and adaptation works commenced early in 2007 and hotel operations commenced in 2008.

The Q Station is located within the Northern Beaches local government area. With the exception of the Wharf the majority of the Q Station is within Sydney Harbour National Park. The bed of the harbour (on which the Wharf sits) is owned by TfNSW, and the Wharf is the subject of a lease agreement between the co-proponents and TfNSW.

The key uses approved for the Q Station include:

- A visitor information centre
- Museum
- Guided interactive tours
- A restaurant
- An accommodation, events and functions centre
- An environmental and cultural study centre; and
- Other site operations (such as archival storage, use or storage of moveable heritage and site administration functions).

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<sup>2</sup> The term 'Q Station' was adopted after Mawland became the leaseholder in 2006. Prior to this time the facility was referred to as the 'Quarantine Station'.

The NPWS Greater Sydney Branch and the Environmental Liaison Officer for the Q Station manages on-ground issues at the Site with day-to-day interactions with Mawland.

The Q Station has been managed by Mawland since 2006. Hotel operations are undertaken under contract by Accor. In November 2021 Mawland entered into a contract for sale of leasehold to North Head Sydney Pty Ltd. Consent to assignment was not finalised during the audit period.

Buildings at the Q Station are identified numerically with the following prefix:

- S = Staff Building.
- P = Passenger Building
- A = Administration Building.
- CP = Car Park.



Figure 1: Project location and key features<sup>3</sup>

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<sup>3</sup> Source: [www.sixmaps.com.au](http://www.sixmaps.com.au)



Figure 2: Q Station site layout<sup>4</sup>

## 2.2 Project approval

The (then) Minister for Infrastructure and Planning granted concurrence for the activity in accordance with Section 115B of the *Environmental Planning and Assessment Act* (the EP&A Act) on 2 June 2003. The Joint Determination Report under Clause 243, Part 5 of the EP&A Act, was authorised by the NSW Minister for the Environment, the Director NSW Heritage Office, and the Chief Executive Maritime Authority on 23 December 2003 as MP08\_0041.

### 2.2.1 Modifications

Since 2003 there have been two withdraw modification requests to MP08\_0041.

A third modification (MP08\_0041 MOD 03) was requested by Mawland on behalf the co-proponents on 14 December 2015 to increase efficiencies in the operation of the Q Station. MP08\_0041 MOD 03 was approved by the Department on 25 May 2018. Modifications to the CoA are presented in green text in Appendix A.

<sup>4</sup> Source: [www.qstation.com.au](http://www.qstation.com.au) [Accessed 6 January 2022]

## 2.3 Activities during the audit period

The following activities occurred during the audit period:

- Reconstruction of Building P21 and P23 occurred between February 2018 and May 2019.
- Operation of Q Station for conferencing, educational tours and products, accommodation, food and beverage service, interpretive museum and upgrading of product as appropriate.
- P1 – P2 Ensuing.
- Cultural landscape interpretation improved by the use of sign boarding and tour product / information.
- Construction of two fender piles near the wharf in September – October 2018.
- Sand replenishment of Quarantine Beach.
- Maintenance and environmental management programs.

### 2.3.1 COVID-19

It is noted that due to COVID-19 requirements put in place by the NSW Government during the latter half of the audit period (2020-2021) the Q Station was either closed or operated under restrictions and hygiene and prevention measures. A summary of dates, activities and operations during the COVID-19 pandemic is as follows:

- 8 April 2020 to mid-June 2020 – Full lockdown – Site completely closed, gates closed, some unauthorised public access over closed gate. Security on site at all times.
- Mid-June 2020 to mid-August 2020 – Site open to public until sunset for walking and biking. Hotel only operational Friday to Sunday. Security on site at all times.
- Mid-August 2020– Hotel operations reopened seven days and site open to public until sunset for walking and biking.
- 17 – 18 October 2020– Hotel operations closed due to NPWS Hazard Reduction Burns resulting in the closure of North Head.
- 21 December 2020 – 4 January 2021 – Site closed for Northern Beaches COVID-19 lockdown. This included Christmas Day, Boxing Day and New Year’s Eve.
- 5 January 2021 – August 2021 – Site open.
- August 2021 - October 2021 – Site closed
- October 2021- 31 December 2021 – Site open.



## 3. AUDIT METHODOLOGY

### 3.1 Audit process

The audit methodology comprised the following activities:

- Initial discussions with Project management to organise the audit, including the provision of a document request list and request for information register, the site inspection and timing
- Consultation with the Department, and other stakeholders as directed by the Department, to discuss any concerns and areas for particular focus during the audit
- Review of site compliance checklists and other documentation provided the co-proponents
- A one-day site inspection and interviews with key site personnel on 3 February 2022
- Review of additional documentation provided by the co-proponents after the site inspection
- Submission of a Draft Report to the co-proponents and stakeholders specified in Schedule 1, CoA 230 outlining the audit findings; and
- Finalisation of the report based on comments from the co-proponents and stakeholders specified in Schedule 1 CoA 230, where applicable.

This Report provides a summary of findings including details of non-compliances identified in the comprehensive audit and recommended actions to improve compliance status.

The audit was carried out in accordance with ISO 19011:2018 Guidelines for Auditing Management Systems.

### 3.2 Consultation

As part of the audit process and in accordance with Section 3.2 of the IAPAR, WolfPeak contacted the Department, EPA, Heritage NSW and TfNSW on 23 December 2021 to seek their views on the scope of the audit as well as the environmental performance of the Project. Given Schedule 1, CoA 221 requires these stakeholders to comment on the draft report the Auditor considered it warranted that they be consulted in the planning process in the event there were any issues they would like to be addressed in the audit. This section provides feedback by the Department and other stakeholders.

Consultation records are presented in Appendix B.

#### 3.2.1 DPE

The Department responded to the request for audit input on 14 January 2022. Table 2 presents these requests and where they have been addressed in this Report.

Table 2: DPE consultation areas of focus

| Issues and Focus   | How Addressed              |
|--|----------------------------|
| <i>"All conditions applicable to the current phase are audited"</i>  | Appendix A                 |
| <i>The environmental performance of the development is assessed, including but not limited to actual versus predicted impacts</i>  | Section 4 and Section 4.3  |
| <i>The implementation status of actions arising from the previous audit report and subsequent annual environmental reports (refer conditions 221 to 225) is included</i>   | Section 4.9 and Appendix A |
| <i>A high-level assessment of the conservation works program (refer conditions 77 to 84) and site/site-wide plans (refer definitions, p.285-6) is included</i>             | Section 4.1 and Appendix A |
| <i>A high-level assessment of the integrated monitoring program, the monitoring results and the adaptive management system (refer conditions 216 to 220) is included".</i> | Section 4.7 Appendix A     |

### 3.2.2 EPA

The EPA responded to the request for input on 19 January 2022 and had no comment concerning the comprehensive audit.

### 3.2.3 Heritage NSW

No comment concerning the scope of the comprehensive audit was received from Heritage NSW.

### 3.2.4 TfNSW

TfNSW responded to the request for input on 25 January 2022. TfNSW believed Section 3.3 of the IAPAR sufficiently covered the scope required but attached a copy of comments provided to Atkins Global (SNC) on 14 January 2021 concerning the Annual Environmental Reports for 2018-2019 and 2020. The two comments concerned the Wharf and related to the condition and maintenance of the structure. In particular, that some planks and sleepers needed replacing, the main area of the Wharf was unable to be used and that repairs to the surface have not progressed.

Refer to CoA 42 for further details.

### 3.2.5 Stakeholder review and comment on draft Audit Report

A preliminary draft Audit Report, presenting the findings from the 2018-2021 audit period, was distributed to the co-proponents to check factual matters and for input into actions in response to findings (where relevant). The preliminary draft Audit Report was reviewed and updated in response to their initial feedback, noting that the Auditor retained the right to make findings or recommendations based on the facts presented.

On 14 March 2022 the Auditor provided the revised draft Audit Report to the co-proponents, the Department, Department of Primary Industries, Heritage NSW, Transport for NSW and the Community Consultative Committee for comment in accordance with CoA 230. The stakeholders

were provided with 6 weeks to review the Report in accordance with CoA 231. Responses were provided by Heritage NSW, the Department and the Community Committee. The correspondence is presented in Appendix G. No response was provided by the Department of Primary Industries, or Transport for NSW. The co-proponents provided a response by way of attending a follow up interview on 13 May 2022 and by providing supplementary evidence relevant to the audit period.

In accordance with CoA 232 the auditor has considered the comments / information received from the organisations. This revision of the Audit Report reflects these considerations.

### 3.3 Site inspection

The site inspection took place on 3 February 2022. Photographs taken during the site inspection are presented in Appendix F. The following areas were observed during the site inspection:

- Wharf Precinct
- Former First Class Precinct
- Former Second Class Precinct
- Former Third Class Precinct
- Former Isolation Precinct
- Former Hospital Precinct; and
- CP1 and CP2.

The following buildings were entered during the site inspection:

Reception, CP5 Maintenance Shed, Boilerhouse Restaurant & Bar, Visitor Centre, Building A2, Building A11, Building A12, A20 Dining Room, Building A23, Building A24 (Maintenance), Building A28-29, Building H1, Building H2, Building H5, Building H4, Building H7, Building H15, Building P1, Building P5, Building P6, Building P13, Building P14, Building P15, Building P23, Building P27, Building S2 and Building S7.

The reservoir building and reservoir were not accessed during the site inspection.

At the time of the site inspection the Q Station was being used for the following activities, under COVID-19 restrictions:

- Accommodation and restaurants
- Conferences
- Weddings and functions; and
- Education, history/ interpretative and paranormal tours.

Weather during the site inspection was overcast and fine.

#### 3.3.1 Meetings & interviews

Opening and closing meetings were held with the Auditor and personnel representing the co-proponents. The attendance sheet is presented in Appendix C.



During the opening meeting the objectives and scope of the Independent Audit, the resources required and methodology to be applied were discussed. At the closing meeting, preliminary audit findings were presented, preliminary recommendations (as appropriate) were made, and any post-audit actions were confirmed. Personnel that participated in interviews are presented in Table 3.

Table 3: Audit meeting attendance and interviews

| Personnel                                 | Company                                      | Position   |
|---|--|--|
| 21 December 2021 – Audit Kick-off Meeting |  |  |
| Michelle Whitmore                         | NPWS - Visitor Engagement & Revenue Branch   | Manager Commercial Projects & Utilities  |
| Rebecca Yit                               | NPWS Park Operations Branch - Greater Sydney | Environmental Liaison Officer  |
| Jessica Dargan                            | NPWS - Team Leader Rangers                   | Team Leader Rangers (and Environmental Manager, August – December 2019)              |
| Suzanne Stanton                           | Mawland                                      | Director and Corporate Counsel   |
| 3 February 2022 – Site Inspection         |  |  |
| Rebecca Yit                               | NPWS Park Operations Branch - Greater Sydney | Environmental Liaison Officer (and Environmental Manager, October 2021 – March 2022) |
| Suzanne Stanton                           | Mawland                                      | Director and Corporate Counsel   |
| Maxwell Player                            | Mawland                                      | Director   |

The Auditor conducted interviews during the site inspection with key personnel involved in Project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development. Other communication was conducted remotely, which included detailed request for information and auditee responses to the request.

The North Head Sydney Pty Ltd's (Purchaser) compliance manager attended the site inspection in an observational capacity.

Another round of interviews with the co-proponents was held in a meeting on 13 May 2022 to discuss the comments raised by the Department on the draft Audit Report. This meeting was attended by:

- Maxwell Player (Mawland)
- Suzanne Stanton (Mawland)
- Andrew Thornton (NPWS)
- Chad Weston (NPWS)
- Jessica Dargan (NPWS)
- Alan Brawn (North Head Sydney Pty Ltd).

### 3.4 Document review

The audit included investigation and review of Q Station files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are referenced in the compliance table presented in Appendix A.

### 3.5 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement using the following descriptors taken from Table 2 of the IAPAR:

| Status        | Description  |
|---------------|--|
| Compliant     | The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.  |
| Non-compliant | The Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.   |
| Not Triggered | A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant. |

The Auditors have made a judgement on the compliance status of each requirement using our best endeavours and the information made available, using the descriptors from the IAPAR. The Auditor notes that our findings are independent of the co-proponents and other relevant stakeholders and agencies.

MP08\_0041 CoA include a number of requirements that are time based following the commencement date. For these CoA, the Auditor took the position that these requirements and actions occurred prior to the audit period and it has been assumed that they were addressed at the time specified and were therefore not assessed as part of this audit. These CoA have been identified as not triggered in accordance with the IAPAR (i.e. they are retrospective); however, in some cases evidence and commentary has been provided to provide context and has therefore been marked as compliant where appropriate.

Conditions considered non-compliant are presented in Table 8 (Section 5.1) of this Report. The table includes a discussion of the compliance status and recommendations for improvement where appropriate.

Where conditions are considered compliant, but it is considered a continuous improvement opportunity exists to further improve the compliance status or to improve environmental performance, a recommendation has been made in the compliance table. A summary of these recommendations is provided in Table 8 of this Report.

Observations and notes may also be made to provide context, identify opportunities for improvement or highlight positive initiatives.

### 3.6 Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

- Have been developed in accordance with the CoA and other environmental licences and approvals applicable to the Q Station (if any) and their content is adequate.
- Have been implemented in accordance with the CoA and other environmental licences and approvals applicable to the Q Station (if any).

The adequacy of post approval documents was determined on the basis of whether:

- There are any non-compliances resulting from the implementation of the document.
- Whether there are any opportunities for improvement.

## 4. ENVIRONMENTAL PERFORMANCE

This Section addresses the requirement from Section 3.3 of the IAPAR “review of the environmental performance of the development” by providing an overview of the compliance status of the Project; listing the environmental management and monitoring plans used to manage and assess environmental performance and discusses complaints received and incidents reported during the audit period as further indicators for environmental performance.

Compliance with Approvals and is also a key indicator of environmental performance and is discussed in Section 4.10.

The Auditor did not undertake a rigorous or technical assessment of the documents required by MP08\_0041, particularly where these documents have already been signed off and/or approved by relevant regulatory authorities or a certifying authority (for example, the Department or OEH).

### 4.1 Adequacy of management plans

The management plans and programs were reviewed and their implementation assessed as part of the audit.

The adequacy of management plans has been determined on the basis on whether:

- There were non-compliances resulting from the implementation of the document; and
- Whether there were any opportunities for improvement.

Management plans are generally dated 2003 – 2008. Mawland provided evidence that an internal review of some plans had been conducted in 2010, 2011 and 2012; however, this review had not progressed to having the plans formally updated, reviewed by their co-proponent and any relevant stakeholder and then submitted for approval by the Department.

Given their age the management plans include references to now outdated proposed forecasts and activities for the Q Station (e.g. waste predications for operations, proposed car numbers) as well as superseded legislation and guidance documents. The plans also lack formal document control to allow the reader to understand when and what updates occurred. Some plans are presented as draft or final draft. Elements of the plans appear to be implemented on an ad-hoc basis; however, given their age and references to proposed activities (such as construction), specific mitigation measures were difficult to assess. The structure of management plans could improved so as to highlight management actions that can be easily identified, implemented and reported and audited against.

Given over 15 years of operations has occurred since the management plans were prepared a comprehensive review of all management plans should be conducted by the co-proponents to verify that they align with current legislative requirements, site conditions and arrangements, roles and responsibilities and objectives and targets.

It is noted that the co-proponents are aware that the plans require a comprehensive update and it was reported that recent discussions had been held in February 2022 with the Department to discuss this issue. The parties intend to commit to each other and the Department to conduct a full review of the Site Wide and other plans referred to in this document before the end of 2022, in conjunction with the new Purchaser of the Lease and Business to create flexible, living and modern documents which will enhance the site’s use.

The Moveable Heritage and Resources Plan was in the process of being updated at the time of the comprehensive audit.

Table 4 presents the adequacy review of the Environmental Management Plan (EMP) and sub-plans. Compliance with CoA EMP requirements are presented in Appendix A.

*Table 4: Adequacy of Environmental Management Plan and Sub-plans*

| Management Plan   | CoA | Comment  |
|---|-----|--|
| Environmental Management Plan, May 2005, Version 12 (EMP)             | 191 | <p><b>Observation</b></p> <p><b>A comprehensive environmental incident response protocol is provided in the EMP. MP08_0041 and the EMP do not provide the definition of an incident and a number of the recorded incidents during the audit period may be considered as maintenance issues rather than an actual incident as defined by other State Significant Developments. In the update to the EMP [and other management plans] consideration should be given to defining incidents and near misses to better categorise recorded issues or events.</b></p> <p>Refer to CoA 195 for further details.</p> |
| Erosion and Sedimentation Control Plan, Fourth Draft, May 2005 (ESCP) | 197 | <p>The Erosion and Sedimentation Control Plan has not been updated since 2005.</p> <p>Refer to CoA 197 for further details.</p>  |
| Noise Management Plan, Fifth Draft, May 2005 (NMP)                    | 199 | <p>The Noise Management Plan has not been updated since 2005.</p> <p>Refer to CoA 199 for further details.</p>   |
| Waste Management Plan, Fourth Draft, May 2005 (WMP)                   | 203 | <p>The Waste Management Plan has not been updated since 2005.</p> <p>Refer to CoA 203 for further details.</p>   |

In addition to the EMP, MP08\_0041 requires additional plans and strategies to be prepared and implemented. Table 5 presents a high-level adequacy review of these additional plans and strategies.

*Table 5: Adequacy of management plans*

| Management Plan            | CoA | Comment   |
|----------------------------|-----|---|
| Conservation Works Program | 77  | <p>The Conservation Works Program Stage 1 was prepared for priority works to be conducted within one to four months of approval.</p> <p>The forecast maximum time periods for each stage was: Stage 1 – 4 months; Stage 2 – 8 months; Stage 3 – 6 months; and Stage 4 – 6 months. This equated to a two-year period. CWP's for Stages 2,3 and 4, whilst outside the audit period, were not available for review.</p> <p>Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response NPWS states that CWP's for stages 2 and beyond were never prepared.</p> <p>All conservation works were completed prior to the audit period. Ongoing maintenance is conducted as required. Nevertheless the Conservation Works program has not been updated since 2006.</p> <p>There was no evidence to demonstrate a regular comprehensive review of the Conservation Works Program had occurred concurrent with or prior to the on-going (5 yearly) comprehensive audits of the activity. The review has not been provided to accompany this Audit Report.</p> |

| Management Plan  | CoA | Comment  |
|--|-----|--|
| Moveable Heritage and Resources Plan, February 2007  | 85  | The Moveable Heritage and Resources Plan was in the process of being updated at the time of the comprehensive audit. The draft Moveable Heritage and Resources Plan 2021 was available for review and had yet to be submitted for approval.<br>The plan available during the audit period was prepared and approved in 2007. |
| Heritage Landscape Management Plan, May 2006   | 91  | The Heritage Landscape Management Plan has not been updated since May 2006.<br>Refer to CoA 94 for further details.  |
| Inscriptions Management Plan<br>Heritage Landscape Management Plan, May 2006]<br><i>Included as part of the Heritage Landscape Management Plan</i>         | 95  | The Inscriptions Management Plan has not been updated since May 2006.<br>Refer to CoA 96 for further details.  |
| Internal Fitout Plan – Part 1, November 2005   | 99  | The Internal Fitout Plan – Part 1 has not been updated since November 2005.<br>Refer to CoA 99 for further details.  |
| Interpretation Plan, February 2005   | 100 | The Interpretation Plan has not been updated since February 2005.<br>Refer to CoA 103 for further details.   |
| Infrastructure Control Plan, February 2008   | 105 | The Infrastructure Control Plan has not been updated since February 2008.<br>Refer to CoA 109 for further details.   |
| Asbestos Cement Sampling [Strategy Conservation Works Program – Stage 1, June 2006]<br><i>Included as part of the Conservation Works Program – Stage 1</i> | 111 | The Asbestos Cement Sampling Strategy included in the Conservation Works Program has not been updated since March 2006.<br>Refer to CoA 111 for further details.   |
| Outdoor Visitor Infrastructure Plan [Infrastructure Control Plan, February 2008]<br><i>Included as part of the Infrastructure Control Plan Part 1</i>      | 112 | The Outdoor Visitor Infrastructure Plan has not been updated since February 2008.<br>Refer to CoA 112 for further details.   |
| Security Plan [Visitor Management Plan, March 2005]  | 116 | Included as part of the Visitor Management Plan.<br>The Security Plan has not been updated since March 2005.<br>Refer to CoA 117 for further details.  |
| Access Strategy [Visitor Management Plan, March 2005]  | 118 | Included as part of the Visitor Management Plan.<br>The [Visitor] Access Strategy has not been updated since March 2005.<br>Refer to CoA 119 for further details.  |
| Predator and Pest Control Plan, October 2008, Version 4  | 188 | The Predator and Pest Control Plan has not been updated since October 2008.<br>Refer to CoA 190 for further details.   |
| Emergency and Evacuation Plan [Visitor Management Plan, March 2005]  | 205 | Included as part of the Visitor Management Plan.<br>The Emergency and Evacuation Plan has not been updated since March 2005.<br>Refer to CoA 208 for further details.  |

## 4.2 Adequacy of the Graphical Information System

The computer-based information management and Geographic Information System (GIS) required by Schedule 1, CoA 66 had not been implemented at the time of the audit.

Refer to CoA's 66-69 for further details.

## 4.3 Actual versus predicted impacts

The audit considered the actual impacts arising from the carrying out of the activity and whether they are consistent with the relevant impacts predicted in Section 4 of the Determination Report.<sup>5</sup> A summary of the assessment is presented in Table 6.

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<sup>5</sup> The Determination Report was the Environmental Assessment provided by the co-proponents and was the only available source of information for assessment of predicted impacts. The Environmental Assessment included a range of studies and predictions that relied on observation, measurement and modelling of the existing environments and potential outcomes arising from the development. Full assessment of the accuracy of these predictions would also require a significant number of studies involving measurement and modelling using actual data points as inputs. Other than the requirements specified in the CoAs (of which some of not been satisfied, as identified in Section 4.1, 5.1 and 5.2 and Appendix A of this Report), to the Auditor's knowledge there are no requirements to undertake such studies and doing so does not form part of this Independent Audit. Any such comparison is qualitative only.



Table 6: Summary of predicted versus actual impacts

| Aspect  | Summary of Predicted Impact(s)  | Summary of Observed Impact(s)   | Consistent (Y/N) |
|---|---|---|------------------|
| 1. Cultural Heritage<br>(Section 4.1 of the Determination Report)                       | <ul style="list-style-type: none"> <li>Changes in use, particularly in terms of type of use;</li> <li>Visitor access and numbers; and</li> <li>Physical changes to the study area. This last category includes reconstructions, alterations to existing buildings, infrastructure and conservation works.</li> </ul>  | <p>The change in use was observed to be sympathetic to the original layout and structures. This includes retrofitting buildings to meet fire and disability regulations and converting them from their original use to accommodation and entertainment (e.g., bars, cafes and restaurants). The inscriptions last received conservation in 2007-2008.</p> <p>Visitor access numbers appear not to have impacted the Q Station. Visitors generally stay to designated roads and paths. COVID-19 affected visitor numbers in 2020 and 2021.</p>   | Yes              |
| 2. Aboriginal Heritage<br>(Section 4.2 of the Determination Report)                     | <p>No recorded Aboriginal sites will be directly impacted by the proposal.</p> <p>There is potential for sites to be disturbed during renovation works, and during operation due to visitors straying off-track and visiting or inadvertently damaging sites. It is not proposed that Aboriginal sites would be visited as part of the regular tours.</p>   | <p>No incidents were recorded during the audit period concerning impacts to Aboriginal sites either from renovation works or visitors straying off-track and visiting or inadvertently damaging sites. Aboriginal sites are not visited as part of regular tours.</p>   | Yes              |
| 3. Flora, Fauna and the Marine Environment<br>(Section 4.3 of the Determination Report) | <ul style="list-style-type: none"> <li>Increases in visitors to the site and movements of people across the site, particularly during periods of peak fauna activity;</li> <li>Increases in noise and light;</li> <li>Increases in vehicular traffic to the site and across the site, together with the re-introduction of active transport uses at the wharf;</li> <li>Construction of car parks (including changes to runoff patterns and volumes), paths, the Funicular stairway and road and stormwater system repairs;</li> <li>Removal of small areas of vegetation (e.g. to construct car parks, undertake road repairs, and improve sight lines from A28-29 to the Hospital Precinct); and</li> <li>Potential increases in predator species attracted to the site.</li> </ul>   | <ul style="list-style-type: none"> <li>Monitoring reports for the audit period imply that visitor numbers have not impacted fauna.</li> <li>No public complaints were made during the audit period concerning noise and light.</li> <li>Car parks, paths, the funicular stairway, road and stormwater systems were constructed prior to the audit period. Observations made during the site inspection did not indicate adverse effects from these impacts.</li> <li>Removal of small areas of vegetation (e.g. to construct car parks, undertake road repairs, and improve sight lines from A28-29 to the Hospital Precinct) was conducted prior to the audit period. No complaints were recorded during the audit period concerning sight lines. It is noted that the previous comprehensive audit identified issues concerning unauthorised vegetation clearing and works.</li> <li>Rabbit control operations significantly increased in Q4 of 2020. The increased numbers of rabbits may also be due to rabbits being driven out of other areas on North Head where vegetation cover has been reduced following an out-of-control hazard reduction fire. One cat and one fox were reported in the period 2018-2019 and 2020.</li> </ul> | Yes              |
| 4. Transport and Visitor Access<br>(Section 4.4 of the Determination Report)            | <ul style="list-style-type: none"> <li>Introduction of a ferry service from Manly to the site, with associated minor works on the Quarantine Station wharf (e.g. low-level lighting, maintenance repairs, etc) and potential impacts on seagrasses and Little Penguins;</li> <li>Substantial increases in visitor numbers accessing the site, particularly in the Wharf Precinct but also across other parts of the site (e.g. tour groups, accommodation areas, etc), with potential impacts on historic heritage, landscape elements (e.g. damage from uncontrolled access), fauna (e.g. disturbance) and the overall sense of isolation and separation of the place.</li> <li>Physical changes and impacts; and</li> <li>Visitor management and impacts.</li> </ul>  | <ul style="list-style-type: none"> <li>In 2019 the ferry stopped at the Q Station eight times per day in peak season. Ferry services were suspended during 2020 and 2021 due to COVID-19.</li> <li>The Integrated Monitoring and Adaptive Management System (IMAMS) 2018-2019 report notes that there was a significant reduction in vehicle usage within the Q Station due to relocation of Reception in 2013.</li> <li>The IMAMS 2018-2019 report noted that overnight stays were increasing but were not achieving leisure 60%+except for weekends.</li> </ul>   | Yes              |
| 5. Infrastructure<br>(Section 4.5 of the Determination Report)                          | <ul style="list-style-type: none"> <li>Provision of a sewer connection from A6 (restaurant) to the existing system in A7;</li> <li>Installation of two 45,000 litre water reservoir's and pumping equipment near the Lower Reservoir;</li> <li>Repairs to stormwater management systems;</li> <li>Repairs to existing water reservoirs, and installation of a fire safety system across the site, including duplication of the existing water supply to provide a separate system for fire management;</li> <li>Repairs to the wharf structure, including new deck lighting, rubbing strips and mooring cleats;</li> <li>Downsizing the existing stormwater pipe at the beach to one third its existing size;</li> <li>Upgrading of electrical systems, including installation of an electrical service to A6 (via the Funicular stairway) and low-level lighting, together with the removal of some existing poles and overhead cables (to be replaced with trenched services);</li> <li>Installation of a 1,000 to 1,500 litre grease trap in the Wharf Precinct and establishment of a waste management area between Buildings A6 and A7 to include a compactor; and</li> <li>Road repairs and installation of a timber kerb in some locations.</li> </ul> | <p>The majority of these works and associated impacts were either conducted prior to the audit period or have not commenced. The site inspection did not identify any issues concerning these potential impacts.</p> <p>No works were completed on the reservoirs during the reporting period or have been since the Project was approved.</p> <p>Repairs to the Wharf were conducted prior to the audit period. Refer to CoA 42 for further details concerning maintenance issues associated with the Wharf.</p> <p>No major road repairs were conducted during the audit period.</p>  | Yes              |



| Aspect  | Summary of Predicted Impact(s)   | Summary of Observed Impact(s)   | Consistent (Y/N) |
|---|--|---|------------------|
| 6. Soil<br>(Section 4.6 of the Determination Report)                                  | Rehabilitation of eroded areas would be undertaken, however there is no proposal to address existing soil contamination issues. The main impacts that could arise from the proposal would occur as a result of the construction of car parks, landscaping works, installation of in-ground services, increased visitor numbers and vehicles (relating to fuel spills).   | Car parks, paths, the funicular stairway, road and stormwater systems were constructed prior to the audit period.<br>No remediation works were conducted in areas of known contamination or potential contamination areas during the audit period.<br>Observations made during the site inspection did not indicate adverse effects from these impacts. Refer to CoA 196 for details concerning the aboveground storage tank located opposite Building A18.   | Yes              |
| 7. Noise<br>(Section 4.7 of the Determination Report)                                 | Potential noise effects associated with the proposal include disturbance to fauna, impacts on local residents (either in the immediate proximity of the site or in the surrounding harbour area), impacts on accommodation guests, and impacts on the 'atmosphere' of the site. The determining authorities particularly note that the potential impacts of noise on Long-nosed Bandicoots are a significant issue for consideration.  | One internal complaint was made on the evening of 10 July 2018 by a Penguin Warden concerning music and dancing at the Boilerhouse. The warden was concerned the noise may impact the Little Penguins.<br>No external noise complaints were recorded during the audit period.<br>Price & Banks <i>et al</i> <sup>6</sup> note that the Long-nosed Bandicoot population appears to have stayed relatively stable since 2016 and remains in a female dominated state, but with the proportion of juvenile males increasing.   | Yes              |
| 8. Light<br>(Section 4.8 of the Determination Report)                                 | Potential impacts would arise from light spill (visible from the harbour); car parks and street lighting; and vehicle movements.   | No external light complaints were recorded during the audit period.   | Yes              |
| 9. Visual Issues<br>(Section 4.9 of the Determination Report)                         | <ul style="list-style-type: none"> <li>• Overflow parking for special events and during car park construction along the upper road;</li> <li>• Umbrellas and a shade structure combined with outdoor seating for the restaurant;</li> <li>• Barrier fencing at both ends of Quarantine Beach and along the cliff face opposite A6;</li> <li>• Reconstruction of P21, P22, P23 and H1; and</li> <li>• The introduction of certain landscape features, such as the Funicular stairway, tennis, croquet and badminton lawns, signage and symbolic fencing.</li> </ul> | The site inspection did not identify any issues concerning these potential impacts.<br>No complaints were recorded during the audit period concerning overflow parking.<br>Individual umbrellas and/or temporary shade structures were observed to be positioned as to minimise any adverse visual impact and did not contain any third-party advertising to the site and its operation. The colour and nature of shade structures and/or umbrellas was neutral and in keeping with the natural environment.<br>Reconstruction of Building P21 and P23 occurred between February 2018 and May 2019.<br>The tennis, croquet and badminton lawns remained untouched during the audit period. No issues were recorded or reported concerning the installation of signage and symbolic fencing. | Yes              |
| 10. Fire and Emergency Issues<br>(Section 4.10 of the Determination Report)           | Potential fire and emergency impacts as a result of the proposal are primarily associated with the use of equipment during construction and operation, increased visitor numbers and greater accessibility to the site.  | No fires and emergency situations arising from Q Station activities or operations were recorded during the audit period.  | Yes              |
| 11. Visitor Health and Waste Management<br>(Section 4.11 of the Determination Report) | Public health risks from bubonic plague are considered minimal, while renovation and conservation works, and natural events have the potential to disturb asbestos materials. Smoking would not be permitted indoors.<br>It is noted that the area between A6 and A7 would contain waste management facilities, including storage bins, a compactor and grease trap. In addition, the EIS (p.10-31) proposed the use of fauna-proof bins.  | No incidents were recorded during the audit period concerning the disturbance of asbestos containing materials. No smoking signs were observed at strategic location across the Q Station.<br>Waste management was observed across the Q Station during the site inspection. Waste bins were observed around the Q Station as were fauna-proof bins.  | Yes              |
| 12. Socio-economic Issues<br>(Section 4.12 of the Determination Report)               | Potential social impacts identified include: a sense of loss of ownership and control of public land; a sense of restricted access with transition from public to private sector operation; increased visitor numbers in local areas; competition from new accommodation development; potential increased impacts on the natural environment; traffic and transport impacts; and increased activity near Quarantine Beach.   | Given the Q Station has been open since 2008 any socio-economic issues have had time to be understood and managed.<br>Transport issues, such as shuttle bus use, are known by the co-proponents and ongoing initiatives are being managed.  | Yes              |

<sup>6</sup> Price & Banks et al, An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report

| Aspect  | Summary of Predicted Impact(s)  | Summary of Observed Impact(s)   | Consistent (Y/N) |
|---|---|---|------------------|
| <b>13. Cumulative Impacts and Integrated Planning [Adverse]</b><br>(Section 4.13 of the Determination Report)     | Potential adverse cumulative impacts of the proposal, both on and off-site, include: <ul style="list-style-type: none"> <li>Impacts associated with increased site visitation, such as deterioration of fabric, loss of sense of isolation and fauna impacts;</li> <li>Increases in local traffic volumes and parking requirements, particularly given the development of St Patrick's College and uncertainties regarding the School of Artillery and other sites;</li> <li>Increases in noise and light and visual impacts (e.g. from the new car parks);</li> <li>Implications for fire safety and emergency planning resulting from increased numbers of day and overnight visitors;</li> <li>Implications for the future viability of any tourism or other commercial activities proposed for other sites at North Head; and</li> <li>Impacts on the basic infrastructure requirements for North Head, especially water and sewer services.</li> </ul> | Given the Q Station has been since 2008 potential adverse impacts have had time to be understood and managed.<br>Potential cumulative issues have been discussed elsewhere in Section 4.3.  | Yes              |
| <b>14. Cumulative Impacts and Integrated Planning [Positive]</b><br>(Section 4.13 of the Determination Report)    | Potentially positive cumulative effects associated with elements of the proposal, such as: <ul style="list-style-type: none"> <li>The undertaking of essential conservation works on-site and within the national park, together with an on-going maintenance program;</li> <li>The upgrading of fire safety systems;</li> <li>Increased community access and interpretation;</li> <li>Provision of water-based access;</li> <li>Promotion of local tourism and the provision of additional accommodation; and</li> <li>Employment benefits.</li> </ul>   | Given the Q Station has been operational for fifteen years potential positive impacts have had time to be understood and managed.<br>Since operations commenced original buildings have been restored, repaired or reconstructed, and retrofitted with fire-safety systems. Water-based access has been provided. Hotel accommodation has been provided and promoted and employment provided to the community.  | Yes              |
| <b>15. Justification &amp; Ecologically Sustainable Development</b><br>(Section 4.14 of the Determination Report) | <ul style="list-style-type: none"> <li>The demonstrated economic need for the proposal and the conclusions of the assessment of feasible alternatives;</li> <li>The funding the proposal would provide for natural and cultural heritage conservation;</li> <li>Consistency with the Sydney Harbour National Park Plan of Management, the QSCMP and the DACMP;</li> <li>Consistency with the principles of ESD;</li> <li>Improvements to public access and interpretation of the site;</li> <li>The provision of economic, social and environmental benefits that outweigh adverse impacts; and</li> <li>Fulfilment of the project objectives.</li> </ul>   | The lease for the Q Station expires in 2027 with an option for a further 15 years followed by another option for 8 years.<br>Public access, interpretation and understanding of the Q Station has improved.<br>The Mawland, Monitoring Report North Head Quarantine Station July 2018 – December 2019 (which forms part of the Annual Environmental Report) notes that the overall sustainability index was 0.97 out of 1.<br>The Mawland, Monitoring Report North Head Quarantine Station January 2020 to December 2020 notes that the overall sustainability index was 0.95 out of 1. | Yes              |

## 4.4 Physical extent of the Project

At the time of the site inspection the physical extent of the Q Station was visually observed to be consistent with the approved boundary. No measurements or readings were taken by the Auditor during the site inspection to confirm this observation.

## 4.5 Incidents

An informal incident register is maintained by Mawland. The co-proponents do not share an incident register for the Q Station. Minor issues were logged in the informal incident register for the audit period. Of note was a North Head hazard reduction burn that broke containment lines and forced the closure of the Q Station on 17 and 18 October 2020. In July 2019 a Brush Turkey nest within the Little Penguin area caused a blocked drain and beach erosion after heavy rainfall. NPWS repaired the drain blockage and beach erosion.

No notifiable incidents were reported to the Department during the audit period.

The Department noted, in its comments on the draft Audit Report, that it considered the bandicoot death in August 2020 to warrant inclusion in this section of the Audit Report. The Department also noted that consistent with the Independent Audit Post Approval Requirements, an assessment of the response to incidents is required.

The Auditor acknowledges the bandicoot death in August 2020, noting however that bandicoot impacts were predicted and that Schedule 5 requires actions to be taken in the event of injury or death. The Auditor draw attention to Section 5.2 and the non-compliance (NC\_2018-2021\_NC\_29) and the lack of full response by the auditee in relation to that event.

The Auditor is of the view that given the deficiencies in the management plans and systems across the entire operation, and the low count of incidents being recorded, that the incident management (and response) system requires an update to ensure incidents are properly identified and responded to.

## 4.6 Complaint management

External and internal complaints are recorded in the complaints register managed by Mawland. No significant complaints were received during the audit period. The complaints register identifies five complaints for the audit period which originated from internal and external sources.

Refer to CoA 8 for further details.

The Department noted, in its comments on the draft Audit Report, that consistent with the Independent Audit Post Approval Requirements, an assessment of the response to complaints is required.

The Auditor is of the view that given the deficiencies in the management plans and systems across the entire operation, and the low count of complaints being recorded that the complaints management system requires an update to ensure complaints are properly identified and responded to.

## 4.7 Integrated monitoring program and adaptive management system

An Integrated Monitoring Program has not been fully developed and implemented for the Q Station. Matters are managed on an ad-hoc basis rather than an cohesive and systematic process that describes how the monitoring will be undertaken, who will do the monitoring and when, and the process for reviewing the results of monitoring. The results of monitoring that is conducted is provided as a standalone report that does not track and trend the data year-on-year to facilitate management decisions.

A monitoring report outlining results from the integrated monitoring program has not been provided for inclusion in the submission of this Audit Report.

Refer to Section 5.1, 5.2 and Appendix A (CoAs 83, 216, 217, 219 and 220) for further details.

## 4.8 Summary of notices from agencies

Other than Direction 3 issued to NPWS on 8 November 2021 requiring this audit be undertaken, to the Auditor's knowledge there were no Show Cause Letters, Penalty Infringement Notices, Prosecutions or Improvement Notices issued by a regulatory authority during the audit period.

The Department noted, in its comments on the draft Audit Report, that leading up to the 8 November 2021 Direction, the co-proponents were made aware of the Department's concerns regarding compliance with the monitoring and auditing program requirements as follows:

- on 8 August 2018, the Department briefed the co-proponents on the various issues and its expectations moving forward
- on 14 September 2018, the Department wrote to the co-proponents identifying that it would be beneficial for annual environmental reports to be prepared in accordance with the Compliance Reporting Post Approval Requirements (June 2018)
- on 11 October 2018, the Department provided comment on the previous draft audit report
- on 24 March 2021, the Department write (sic) to each co-proponent regarding non-submission of subsequent annual environmental reports.

## 4.9 Status of previous comprehensive audit findings

Table 7 provides a summary of the status of the previous audit findings as presented in Table 5 of the 2018 compliance audit report (SNC Lavalin, 2021<sup>7</sup>, pp.19-20). It is understood the previous findings were a combination of self-reported non-compliances by the co-proponents during the previous audit period and findings identified by the previous Auditor. The co-proponents reported that the status of the previous audit findings [2018] as presented in Table 1 (pp.4-7) the 2018-2019 Annual Environmental Report<sup>8</sup> had not changed given the report was prepared in December 2021.

Five findings were closed while five findings remained open.

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<sup>7</sup> SNC Lavalin, Compliance Audit Report Quarantine Station North Head, SNC-140410, 12/12/2018, Rev 2

<sup>8</sup> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08\_0041) July 2018 to December 2019, 15/12/21

Table 7: Status of previous independent audit findings

| Issue No. | 2018 Finding Subject   | 2018 Recommendation  | 2021 Status <sup>6</sup>   |
|-----------|--|--|--|
| 2018_01   | Unauthorised Vegetation Clearing   | Consult with OEH and submit required documentation prior to approval for proposed vegetation removal. Provide refresher training to staff, maintenance and weeding contractor(s) to prevent recurrence.  | CLOSED<br><i>"Refresher training on vegetation identification and clearing is provided to the Q Station contractor 'Go Gardening' approximately every three months via toolbox talks given by Gavin Opie (Director). This commenced in mid-2018. Identification of the Sunshine Wattle is included within this training".</i>  |
| 2018_02   | New Works  | Work in accordance with the existing OEH/NPWS "Construction Assessment Procedures" prior to, during and at completion of new works on site. Provide refresher training to staff and maintenance contractors as required to prevent recurrence.   | CLOSED<br><i>"Refresher training was provided by NPWS Environmental Manager and Cherie Pittman on 27 November 2017. This included provision of all appropriate forms to be used in the future. NPWS has been proactive in assisting Q Station to determine the information required to work within the Construction Assessment Procedures (<a href="https://www.environment.nsw.gov.au/topics/parksreserves-and-protected-areas/developmentguidelines/construction-assessment-procedures">https://www.environment.nsw.gov.au/topics/parksreserves-and-protected-areas/developmentguidelines/construction-assessment-procedures</a>)".</i>  |
| 2018_03   | Opportunity to increase trips by sustainable forms of transport and reduce car usage   | Explore further promotional opportunities of sustainable transport options for visitors to the site. This includes the free shuttle bus and the ferry Services from Manly Wharf. Some opportunities may include the website and the provision of traveller information to day visitors and tour groups   | CLOSED<br><i>"The Eco Hopper Ferry Service operated during this period from Circular Quay to Manly via Luna Park, various Harbour Islands and the Eastern Suburbs. The ferry generally stopped at Q Station 8 times per day. Consumer uptake was slow but consistent. This was not a commuter ferry service.<br/><br/>A shuttle bus to Manly operates on visitor request by guests of Q Station but not members of the public. There is a public bus service available that is also used regularly by guests arriving, departing and visiting the local area. Ubers and taxis are also used frequently by guests.<br/><br/>No cars are permitted on site except operation cars and site mini buses. Guests are encouraged to walk or ride on the site if possible. Bike racks and hire bikes are available on site. The Q Station website and site signage contains this information".</i> |
| 2018_04   | Waste Management – Bin placement around the site could be improved so bins are more visually accessible to patrons and they are better informed of recycling options | The placement of bins (and signage) is reviewed and improved as appropriate.   | CLOSED<br><i>"New bins and bin housing was improved following the 2018 Audit. The design and placement of bins is regularly reviewed as brush turkeys learn how to access the bins".</i>   |
| 2018_05   | Sewage Spillage – notification to authorities and at-risk persons  | The incident notification protocol should be regularly reviewed and updated and ensure that it is implemented for incidents that "cause or threaten environmental harm". In the event of a sewage spill into Sydney Harbour, the EPA, Council and Department of Health should be notified "Immediately and without delay". Recreational users of the harbour should be notified immediately to ensure their safety and so that evacuation plans can be implemented in the event of an incident | CLOSED<br><i>"The incident notification protocol was reviewed in line with the requirements".</i>  |



| Issue No. | 2018 Finding Subject  | 2018 Recommendation  | 2021 Status <sup>6</sup>  |
|-----------|---|--|---|
| 2018_06   | Seagrasses – threat of recreational vessel anchoring from dropping or setting of the anchor | Although not the responsibility of Mawland, it is recommended that the mooring exclusion zone at Quarantine Beach is extended.   | <p>OPEN</p> <p>In 2007 the NSW DPI reviewed the pilot seagrass surveys and determined that there were impacts on seagrass at this time as a result of propellers and anchors at Quarantine Bay. DPI also stated at that time that no further seagrass monitoring was warranted as it would unlikely provide significant environmental outcomes in the long term.</p> <p>Despite this it appears as seagrass monitoring continued in an informal manner through 2018-2019. The Auditor is not aware of the rationale or reasoning for this. Monitoring reports were available for 2018 and 2019; however, monitoring was not conducted in 2020 and 2021 due to COVID-19 restrictions. The reports do not refer to the monitoring methodology, such the use of GPS, survey quadrants or sample analysis. The conclusions from the monitoring undertaken are not tracked or trended year-on-year and provide only commentary concerning the visual condition of the seagrass.</p> <p>Only two yellow markers were observed to delineate the no mooring area for the seagrass meadow and Little Penguins. NPWS notes that the moorings reside outside the land defined under the CoA and lease. The moorings are the responsibility of TfNSW. NPWS is actively working with TfNSW as well as DPI Fisheries to improve the visibility of the demarcation line.</p> |
| 2018_07   | Pest Abatement Programs   | Ongoing implementation (review and continual improvement) of pest abatement programs to ensure fox and rabbit numbers are within acceptable ranges.                        | <p>OPEN</p> <p><i>“Ongoing – program on track. Results within indicator acceptable range. Predator and Pest Animal Plan 2008 under review, to be updated in accordance with management responses outlined in the Regional Pest Management Strategy 2012-2017 (under revision) and Fox TAP (Threat Abatement Plan) Site Plan”.</i></p>   |
| 2018_08   | Environmental Management Plan   | The EMP consists of a series of documents and procedures. It is recommended these are consolidated to form one consolidated set of environmental operating procedures.     | <p>OPEN</p> <p>The EMP and sub-management plans have not been updated.</p> <p>Refer to CoA 195 and Section 4.1 for further details.</p>   |
| 2018_09   | Environmental Reporting and Audit Timeframes  | Ensure reporting dates are documented in diaries of key operational staff to ensure adequate time is allocated to prepare and submit key environmental reports and audits. | <p>OPEN</p> <p><i>“This document has been prepared in accordance with the direction received from the Planning Secretary. Future dates for preparation of documentation have been noted with the NPWS Environmental Manager and Mawland”.</i></p>   |
| 2018_10   | Incompletion Status of Conditions   | Review conditions where unknown completion has been achieved and close out any residual actions.   | <p>OPEN</p> <p><i>“Ongoing. This is being undertaken as part of this Annual Report (2018 – 2019) and will continue to be addressed in the preceding years reports where conditions have not been completed”.</i></p>  |

## 4.10 Status of actions from the previous annual environmental report

The most recent Annual Environmental Report sighted by the Auditor was for the 2020 calendar year and was finalised in December 2021 (SNC Lavalin, 2021<sup>9</sup>). Table 1 of the 2020 Annual Environmental Report identifies the status of previous report actions. Appendix A of the 2020 Annual Environmental Report identified non-compliances 2020 reporting period. The status of these is provided below.

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<sup>9</sup> SNC Lavalin, Annual Environmental Report – January 2020 to December 2020, EDPM/AU/SN0243077/Annual Report\_2020, 15/12/2021



| Ref.   | CoA | Non-compliance  | Recommended action in the 2020 Annual Environmental Report (15/12/2021)                        | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup> |
|--|-----|---|--|---|--|
| <b>Findings from earlier reporting periods as identified in Table 1 of the Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21)</b> |     |   |  |   |  |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019   | 5   | Monitoring reports and data is not publicly available   | Co-proponents to address   | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019   | 66  | A GIS or information management system was not developed for Q Station. Documentation is held in paper files at S7 at Q Station and on the NSW Government Department information system CM9 | Co-proponents to consider options with regard to fulfilling the requirements of this condition | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019   | 67  | A GIS or information management system was not developed for Q Station. Documentation is held in paper files at S7 at Q Station and on the NSW Government Department information system CM9 | Co-proponents to consider options with regard to fulfilling the requirements of this condition | Ongoing   | Non-compliant (Open)                               |

<sup>10</sup> The Auditors note that our findings are independent of the co-proponents and other relevant stakeholders. Refer to Section 5.2 and Appendix A for details.

| Ref.   | CoA | Non-compliance  | Recommended action in the 2020 Annual Environmental Report (15/12/2021)                        | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup> |
|--|-----|---|--|---|--|
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 68  | A GIS or information management system was not developed for Q Station. Documentation is held in paper files at S7 at Q Station and on the NSW Government Department information system CM9 | Co-proponents to consider options with regard to fulfilling the requirements of this condition | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 74  | There has been a lapse in on-going consultation with the Aboriginal community. The co-proponents have obtained advice on these matters as required.   | NPWS to undertake consultation with the Aboriginal community                                   | Ongoing   | Compliant (Closed)                                 |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 83  | No review of the CWP since 2006   | Review of document to be undertaken in 2022  | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 96  | A review of the Inscriptions Management Plan has not been undertaken  | Review of document to be undertaken in 2022  | Ongoing   | Non-compliant (Open)                               |

| Ref.   | CoA | Non-compliance  | Recommended action in the 2020 Annual Environmental Report (15/12/2021) | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup>  |
|--|-----|---|---|---|---|
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 98  | Works have not been completed. The stone mason recommended by the Heritage Council has not been willing to undertake the works and the Heritage Council have not approved the works to be undertaken by the University of Sydney. | Co-proponents to seek advice from Heritage NSW                          | Ongoing   | Not triggered for the current audit period. Considered open until such time as historical conservation works are completed. |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 106 | The Infrastructure Control Plan does not address all the required items of this condition   | Review of document to be undertaken in 2022                             | Ongoing   | Compliant (Closed)  |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 109 | A review of the Infrastructure Control Plan has not been undertaken   | Review of document to be undertaken in 2022                             | Ongoing   | Non-compliant (Open)  |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 114 | Two vending machines were installed in 2019 by Mawland at the request of guests for snacks and drinks when these services are not available on site.  | Vending machines will be removed from site in Autumn 2022               | Ongoing   | Non-compliant (Closed)  |

| Ref.   | CoA | Non-compliance  | Recommended action in the 2020 Annual Environmental Report (15/12/2021)                     | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup> |
|--|-----|---|---|---|--|
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 117 | A review of the Security Plan has not been undertaken   | Review of document to be undertaken in 2022   | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 119 | A review of the Access Strategy has not been undertaken.  | Review of document to be undertaken in 2022   | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 138 | No data available on the ferry service between Manly and Q Station  | Collect data on the ferry service between manly and the Q Station to ensure compliance      | Ongoing   | Compliant (Closed)                                 |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 139 | Less than 40% of arrivals use the ferry system. Most guests arrive by car, public bus or walk from manly. Q Station encourages ferry use as much as possible. | Mawland and QSCCC have spoken with NRMA to request the Eco Hopper ferry service recommences | Ongoing   | Compliant (Closed)                                 |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 184 | There was no formal seagrass monitoring undertaken during the reporting period  | Seagrass monitoring to be scheduled in 2022   | Ongoing   | Compliant (Open)                                   |

| Ref.   | CoA | Non-compliance   | Recommended action in the 2020 Annual Environmental Report (15/12/2021) | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup>                 |
|--|-----|--|---|---|--|
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 185 | There was no formal seagrass monitoring undertaken during the reporting period | Seagrass monitoring to be scheduled in 2022                             | Ongoing   | Compliant (Open). Refer CoA 184 in Section 5.2 and Appendix A.     |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 186 | There was no formal seagrass monitoring undertaken during the reporting period | Seagrass monitoring to be scheduled in 2022                             | Ongoing   | Not triggered (Open). Refer CoA 184 in Section 5.2 and Appendix A. |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 187 | There was no formal seagrass monitoring undertaken during the reporting period | Seagrass monitoring to be scheduled in 2022                             | Ongoing   | Not triggered (Open). Refer CoA 184 in Section 5.2 and Appendix A. |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 190 | A review has not been undertaken for the Predator and Pest Control Plan.       | Review of document to be undertaken in 2022                             | Ongoing   | Non-compliant (Open)   |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 192 | No evidence of approval of the EMS   | Review of document to be undertaken in 2022                             | Ongoing   | Non-compliant (Open)   |

| Ref.   | CoA | Non-compliance  | Recommended action in the 2020 Annual Environmental Report (15/12/2021)  | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup> |
|--|-----|---|--|---|--|
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 195 | A review has not been undertaken for the EMP  | Review of document to be undertaken in 2022  | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 216 | An Integrated Monitoring Program has not been developed for the site.   | Under review   | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 217 | An Integrated Monitoring Program has not been developed for the site.   | Under review   | Ongoing   | Non-compliant (Open)                               |
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019 | 221 | The Annual Environmental reports supplied to the Department on 30 April 2021 did not satisfy the relevant Approval conditions | Prepare a new Annual Environmental Report to be submitted to the Department in accordance with the Compliance Reporting Post Approval Requirements (2020). | Ongoing   | Non-compliant (Closed)                             |

| Ref.   | CoA | Non-compliance   | Recommended action in the 2020 Annual Environmental Report (15/12/2021)  | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup> |
|--|-----|--|--|---|--|
| Annual Environmental Report. Quarantine Station North Head. July 2018 to December 2019   | 223 | The Annual Environmental reports supplied to the Department on 30 April 2021 did not satisfy the relevant Approval conditions  | Prepare a new Annual Environmental Report to be submitted to the Department in accordance with the Compliance Reporting Post Approval Requirements (2020). | Ongoing   | Non-compliant (Closed)                             |
| <b>Findings identified in Appendix A of the Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (where not carried over from earlier reporting periods)</b> |     |  |  |   |  |
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21)  | 82  | No review of the CWP since 2006  | Review of document to be undertaken in 2022  | Ongoing   | Non-compliant (Open)                               |
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21)  | 126 | During the reporting period, Open Days were cancelled due to the COVID Pandemic. DPIE were notified of this at the time. No further requirements of Q Station were necessary | None identified  | Not identified  | Compliant (Closed)                                 |



| Ref.  | CoA | Non-compliance   | Recommended action in the 2020 Annual Environmental Report (15/12/2021) | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup> |
|---|-----|--|---|---|--|
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21) | 127 | Planned Open days were cancelled as a result of the pandemic. With the approval of DPIE, the 2020 Open Days were held as part of the Les Sculptures Refusees exhibition (15 Oct – 17 Nov 2020) on site, with all activities outdoor due to the pandemic. Unfortunately, the weather was inclement on these days, and the site was evacuated on 17 October due to the NPWS hazard reduction burn breaking containment on North Head | None identified   | Not identified  | Compliant (Closed)                                 |
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21) | 138 | The ferry service operated to this timetable until the first 2020 COVID lockdown (March 2020). This service was then cancelled by RMS/NRMA. Discussions continue as to restoration, which is not expected until full border reopening  | None identified   | Not identified  | Compliant (Closed)                                 |
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21) | 184 | There is no regular sea grass monitoring program. The contractor engaged to undertake this work was unable to attend due to COVID restrictions.  | None identified   | Not identified  | Compliant (Open)                                   |

| Ref.  | CoA | Non-compliance  | Recommended action in the 2020 Annual Environmental Report (15/12/2021) | Status in the 2020 Annual Environmental Report (15/12/2021) | Status at the 2021 Independent Audit <sup>10</sup>                 |
|---|-----|---|---|---|--|
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21) | 185 | Ferry services commenced in 2008. The services were cancelled by RMS/NRMA at the beginning of the 2020 COVID lockdown. There was no formal sea grass monitoring undertaken during the reporting timeframe as the contractor engaged to undertake this work was unable to attend due to COVID restrictions | None identified   | Not identified  | Compliant (Open). Refer CoA 184 in Section 5.2 and Appendix A.     |
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21) | 186 | There was no formal sea grass monitoring undertaken during the reporting timeframe as the contractor engaged to undertake this work was unable to attend due to COVID restrictions  | None identified   | Not identified  | Not triggered (Open). Refer CoA 184 in Section 5.2 and Appendix A. |
| Appendix A of Annual Environmental Report. Quarantine Station North Head. January 2020 – December 2020 (dated 15/12/21) | 187 | There was no formal sea grass monitoring undertaken during the reporting timeframe as the contractor engaged to undertake this work was unable to attend due to COVID restrictions  | None identified   | Not identified  | Not triggered (Open). Refer CoA 184 in Section 5.2 and Appendix A. |

## 5. AUDIT FINDINGS

This Section presents non-compliances and observations from the audit. Detailed findings against each requirement are presented in Appendix A.

### 5.1 Summary of assessment - Conditions of Approval

In relation to MP08\_0041 the following was identified:

- A total of 289 CoAs from Schedules 1 through 9 were assessed.
- A total of 161 CoAs were compliant.
- A total of 33 CoAs were non-compliant.
- A total of 95 CoAs were not triggered.
- A total of 22 CoAs (classified as either compliant or not triggered) had observations identified.

Refer to Table 8 for further details. Table 9 summaries findings concerning management plans.

## 5.2 Summary of non-compliances and non-conformances

Table 8: MP08\_0041 audit findings and recommendations

| Ref                    | CoA    | Finding Category | Requirement  | Finding / Comment  | Recommendation  | Status |
|------------------------|--------|------------------|--|--|---|--------|
| <b>Non-compliances</b> |        |                  |  |  |   |        |
| 2018-2021_NC_01        | CoA 03 | Non-compliant    | <b>Compliance with Conditions</b><br>It shall be the ultimate responsibility of the co-proponents to ensure compliance with the conditions of this approval and to ensure compliance by staff and contractors. The conditions do not relieve the co-proponents of the obligation to obtain all other approvals from relevant authorities required under any other legislation.   | Numerous non-compliances were identified during the comprehensive audit of MP08_0041. Most of the non-compliances are administrative in nature.  | During the overarching update of management plans and systems, consideration should be given to developing and implementing a responsibilities matrix, or similar, for each CoA to enable a better understanding of responsibilities between the co-proponents.                     | OPEN   |
| 2018-2021_NC_02        | CoA 05 | Non-compliant    | <b>Public Information</b><br>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.   | The Environmental Management Plan (V12, 2005) and monitoring reports and data were not available publicly available at the time of the audit.  | Final reports, reviews, plans and monitoring data referred to in the conditions of approval to be publicly available, where there exists no commercially confidential information.  | OPEN   |
| 2018-2021_NC_03        | CoA 27 | Non-compliant    | Timber buildings shall not be used for the storage of fuel or other flammable materials.   | Incompatible Class 3 (flammable) and Class 8 (corrosive) products were observed to be stored together and without secondary containment in the timber Maintenance / Glasshouse Building (A24) end room. Two gas canisters were also observed to be stored in the building. A fire extinguisher was not located in the end room where the flammable packages were stored. | Evidence of the reorganized packages was provided to the Auditor on 10 February 2022. Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that all flammable chemicals had been removed from building A24. | CLOSED |
| 2018-2021_NC_04        | CoA 52 | Non-compliant    | Prior to the commencement of construction works the co-proponents shall appoint a suitably qualified Environmental Manager (EM). The appointment of the EM shall be subject to the approval of the DEC and DIPNR. The co-proponents shall provide to the DEC and DIPNR the following information:<br>a) the qualifications and experience of the EM;<br>b) the roles and responsibilities of the EM; and<br>c) the authority and independence of the EM.<br>An EM shall be engaged for the duration of the approval. | No evidence was available to demonstrate that the Department had approved all of the Environmental Managers that held the position during the audit period.  | Approval for the current Environmental Manager should be obtained from the Department.  | OPEN   |
| 2018-2021_NC_05        | CoA 66 | Non-compliant    | <b>Information Management System</b><br>The co-proponents shall develop and implement a computer-based information management and Geographic Information System (GIS) for the site. The requirements of the <i>State Records Act 1998</i> and other relevant legislation, standards and guidelines shall be taken into account in developing the system.   | A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66. The co-proponents do not share a document management system making it difficult for both parties to access and share key operational and compliance documentation.   | Develop and implement a computer-based information management and Geographic Information System (GIS) for the site.   | OPEN   |
| 2018-2021_NC_06        | CoA 67 | Non-compliant    | An outline of the system is to be submitted to the DEC for approval within 12 months of the commencement date. Implementation of the system must commence within 3 months of the date its approval.  | A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66.  | Develop and implement a computer-based information management and Geographic Information System (GIS) for the site.   | OPEN   |

| Ref             | CoA    | Finding Category | Requirement  | Finding / Comment   | Recommendation  | Status |
|-----------------|--------|------------------|--|---|---|--------|
| 2018-2021_NC_07 | CoA 68 | Non-compliant    | <p>The primary role of the system shall be to document decision making by providing a record of all works and management actions taken, and provide current information on resources and assets at the site. The system must be regularly updated and record and reference a range of information, including but not limited to the following:</p> <ol style="list-style-type: none"> <li>all approvals issued for works;</li> <li>all works undertaken, including renovation, construction and regular maintenance works (date, what work, location etc);</li> <li>monitoring programs implemented;</li> <li>references to building plans, files, maps, design specifications and other documents;</li> <li>Conservation Works Program schedules, including a list of works (including regular maintenance works), priorities and when works are to be conducted (month/year);</li> <li>Moveable Heritage and Resources Plan (condition 85); and</li> <li>GIS data layers: <ul style="list-style-type: none"> <li>location of lease boundary</li> <li>locations of standing buildings, inscriptions, former fence lines and barriers, cultural landscape features and other historic structures, works and paths</li> <li>archaeological information as per the requirements of the North Head Quarantine Station Archaeological Management Plan</li> <li>locations of Aboriginal archaeological sites</li> <li>locations of threatened flora species, Eastern Suburbs Banksia Scrub, and high-use foraging habitat for the Long-nosed Bandicoot<sup>38</sup></li> <li>areas subject to bushfire hazard reduction and/or wildfires, including fire history</li> <li>bush regeneration areas, including a history of works</li> <li>locations of all existing and new site services and infrastructure</li> <li>locations of all new works (including carparks, reconstructions, signs, lights, fences, paths) data from monitoring programs, as relevant (e.g. Longnosed Bandicoot and penguin mortalities).</li> </ul> </li> </ol> | A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66.                                     | Develop and implement a computer-based information management and Geographic Information System (GIS) for the site.   | OPEN   |
| 2018-2021_NC_08 | CoA 69 | Non-compliant    | The co-proponents shall undertake a review of the Information Management and GIS System every five years after the commencement date for the duration of the activity. The review shall focus on the effectiveness of the system for managing data, and currency of information contained within the system, and be submitted to the DEC. The co-proponents shall comply with all reasonable requirements of the DEC with respect to the outcomes of the review.   | A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66.                                     | Develop and implement a computer-based information management and Geographic Information System (GIS) for the site.   | OPEN   |
| 2018-2021_NC_09 | CoA 72 | Non-compliant    | The co-proponents shall undertake a review of the Aboriginal Heritage Management Plan every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with the Heritage Council, DEC and relevant Aboriginal stakeholders. On the basis of the review the co-proponents shall, as necessary, prepare a revised Aboriginal Heritage Management Plan to be submitted to the Heritage Council and DEC for approval.   | The Aboriginal Heritage Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department and Heritage Council since 2008. | Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets. | OPEN   |

| Ref             | CoA    | Finding Category | Requirement  | Finding / Comment  | Recommendation  | Status |
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| 2018-2021_NC_10 | CoA 82 | Non-compliant    | <p>The co-proponents shall undertake a review of the Conservation Works Program (CWP) concurrent with or prior to the first comprehensive audit of the activity (condition 228), and thereafter on an annual basis as part of the overall annual environmental report (condition 221). An annual review is not required in the year that a comprehensive review of the CWP occurs (condition 83).</p> <p>The review must be undertaken in consultation with the DEC and the Heritage Council, and include:</p> <ul style="list-style-type: none"> <li>a) a list of conservation works implemented;</li> <li>b) the identification of any additional conservation works required to be undertaken. This must include specific consideration of the condition of all asbestos items and actions required to ensure that public health and safety standards are met ; and</li> <li>c) information on the amount spent on conservation works (including maintenance works) within the site annually, together with independent verification of expenditures provided by a quantity surveyor. The information should include a breakdown on costs and works undertaken.</li> </ul> <p>Advice must be sought from the relevant Aboriginal community group/s, an appropriately qualified and experienced conservation practitioner and other specialists as required in the review process.</p> | There was no evidence to demonstrate a review of the CWP had occurred concurrent with or prior to the first audit of the activity (condition 228), and thereafter on an annual basis as part of the overall annual environmental report.               | The CWP should be reviewed and updated where required to align with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.                            | OPEN   |
| 2018-2021_NC_11 | CoA 83 | Non-compliant    | <p>The co-proponents shall undertake a regular comprehensive review of the CWP concurrent with or prior to the on-going (5 yearly) comprehensive audits of the activity (condition 228). The review shall be undertaken in consultation with the Heritage Council and the DEC. In addition to the matters referred to above, the review shall include a re-assessment of the condition of each heritage item (historic and Aboriginal) and a reassessment of conservation priorities.</p>  | There was no evidence to demonstrate a regular comprehensive review of the CWP had occurred concurrent with or prior to the on-going (5 yearly) comprehensive audits of the activity. The review has not been provided to accompany this Audit Report. | The CWP should be reviewed and updated where required to align with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets                             | OPEN   |
| 2018-2021_NC_12 | CoA 94 | Non-compliant    | <p>The co-proponents shall undertake a review of the Heritage Landscape Master Plan every five years after the commencement date for the duration of the activity. The review shall be undertaken with advice from a heritage landscape specialist and other relevant specialists. On the basis of the review the co-proponents shall, as necessary, prepare a revised Heritage Landscape Master Plan to be submitted to the DEC and the Heritage Council for approval.</p>  | The Heritage Landscape Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department and Heritage since May 2006.   | Review and update the Heritage Landscape Management Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets. | OPEN   |
| 2018-2021_NC_13 | CoA 96 | Non-compliant    | <p>The co-proponents shall undertake a review of the Inscriptions Management Plan every five years after the commencement date for the duration of the activity. The review shall be undertaken with advice from relevant specialists. On the basis of the review the co-proponents shall, as necessary, prepare a revised Inscriptions Management Plan to be submitted to the DEC and the Heritage Council for approval.</p>  | The Inscriptions Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department and Heritage since May 2006.   | Review and update the Inscriptions Management Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.       | OPEN   |

| Ref             | CoA             | Finding Category | Requirement   | Finding / Comment   | Recommendation   | Status |
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| 2018-2021_NC_14 | CoA 103         | Non-compliant    | <p>The co-proponents shall undertake a review of the Interpretation Plan every five years after the commencement date for the duration of the activity. The review shall be undertaken by a suitably qualified and experienced interpretive planner, in consultation with the Heritage Council. The review shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>a) the range of interpretive programs being offered at the Quarantine Station. This shall include a review of the content, methods of delivery and consideration of contemporary best practice in interpretation;</li> <li>b) consider relevant results of the visitor monitoring program and adaptive management responses;</li> <li>c) consider the provisions of any current endorsed conservation management plan for the site; and</li> <li>d) provide recommendations for any revisions to the Interpretation Plan.</li> <li>e) On the basis of the review the co-proponents shall, as necessary, prepare a revised Interpretation Plan to be submitted to the DEC for approval.</li> </ul> | The Interpretation Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since it was first approved in 2005.                           | Review and update the Interpretation Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.         | OPEN   |
| 2018-2021_NC_15 | CoA 109         | Non-compliant    | The co-proponents shall undertake a review of the Infrastructure Control Plan every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with those agencies listed in condition 105) above, relevant public authorities and infrastructure providers. On the basis of the review the co-proponents shall, as necessary, prepare a revised Infrastructure Control Plan to be submitted to the DEC for approval.  | The Infrastructure Control Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since February 2008.                                   | Review and update the Infrastructure Control Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets. | OPEN   |
| 2018-2021_NC_16 | CoA 114         | Non-compliant    | The use of laser or neon lighting (with the exception of emergency lighting), food or beverage vending machines, and commercial advertising signage on the site is not permitted.   | Two vending machines were installed in 2019 at the request of guests for snacks and drinks when food and drink services are not available. One vending machine was observed during the site inspection. | Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that the vending machines were removed on 17 February 2022.                                     | CLOSED |
| 2018-2021_NC_17 | CoA 117         | Non-compliant    | The co-proponents shall undertake a review of the Security Plan every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with the NSW Police. On the basis of the review the co-proponents shall, as necessary, prepare a revised Security Plan to be submitted to the DEC for approval.   | The Security Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since March 2005.  | Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.                        | OPEN   |
| 2018-2021_NC_18 | CoA 119         | Non-compliant    | The co-proponents shall undertake a review of the Access Strategy every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with the Heritage Council, Northern Beaches Council and the State Transit Authority. On the basis of the review the co-proponents shall, as necessary, prepare a revised Access Strategy to be submitted to the DEC and DIPNR for approval  | The [Visitor] Access Strategy had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since March 2005.  | Review and update the [Visitor] Access Strategy where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.   | OPEN   |
| 2018-2021_NC_19 | <i>Not used</i> |                  |   |   |  |        |
| 2018-2021_NC_20 | <i>Not used</i> |                  |   |   |  |        |
| 2018-2021_NC_21 | <i>Not used</i> |                  |   |   |  |        |



| Ref             | CoA     | Finding Category | Requirement  | Finding / Comment   | Recommendation  | Status |
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| 2018-2021_NC_22 | CoA 190 | Non-compliant    | <b>Predator and Pest Control</b><br>The co-proponents shall 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. The review shall be undertaken in consultation with the DEC and with advice from relevant specialists. On the basis of the review the co-proponents shall, as necessary, prepare a revised plan to be submitted to the DEC for approval   | The Predator and Pest Control Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since October 2008.   | Review and update the Predator and Pest Control Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets. | OPEN   |
| 2018-2021_NC_23 | CoA 192 | Non-compliant    | <b>Environmental Management Plan</b><br>The EMP shall be prepared and approved prior to the commencement of construction works or new operation functions as described in the PAS. Operations already occurring on site prior to the commencement date may continue without an approved EMP, subject to other relevant conditions of this approval having been met. The EMP may be updated and amended with the approval of the DEC to incorporate other strategies, plans and programs required by the conditions of approval.  | No evidence was available to confirm the Environmental Management Plan had been approved, noting this requirement occurred prior to the audit period. The EMP does note that it was presented to the QSCCC on 16 December 2004.                               | Refer to CoA 195.   | OPEN   |
| 2018-2021_NC_24 | CoA 195 | Non-compliant    | The EMP shall be reviewed and revised in consultation with the DEC as necessary to incorporate revisions to relevant site-wide strategies, plans and the results of the integrated monitoring program.   | The Environmental Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, since 2005. The EMP contains outdated legislative references and names of Government agencies, departments and stakeholders. | Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.                           | OPEN   |
| 2018-2021_NC_25 | CoA 208 | Non-compliant    | <b>Emergency and Evacuation Plan</b><br>The co-proponents shall undertake a review of the plan every five years after the commencement date for the duration of the activity or earlier if considered necessary by the DEC. The review shall be prepared in consultation with the agencies specified in condition 205). On the basis of the review the co-proponents shall, as necessary, prepare a revised Emergency and Evacuation Plan to be submitted to the DEC for approval.   | The Emergency and Evacuation Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since March 2005.  | Review and update the Emergency and Evacuation Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.  | OPEN   |
| 2018-2021_NC_26 | CoA 216 | Non-compliant    | <b>Monitoring</b><br>Within twelve months of the commencement date an integrated monitoring program for the activity shall be prepared by the co-proponents and submitted for approval of DEC and DIPNR. The program shall be prepared in consultation with the Heritage Council and other relevant authorities. Implementation of the program shall commence no later than three months from the date of approval of the program. The primary aim of the program shall be to monitor over time the effects of the activity on the significance of the Quarantine Station site and immediately adjoining areas (such as Quarantine Beach and the Wharf), and to identify the need to develop and implement strategies to respond to any adverse impacts identified. An integrated monitoring program shall be implemented for the life of the activity and shall address: <ol style="list-style-type: none"> <li>the feature or issue to be monitored;</li> <li>how the monitoring will be undertaken (eg. methods) and who will undertake this work;</li> <li>frequency of monitoring; and</li> <li>a process for reviewing the results of monitoring and identifying measures to be implemented to respond to impacts, and/or to meet the requirements of the approval.</li> </ol> | An Integrated Monitoring Program had not been implemented for the Q Station during the audit period.  | Develop and implement an Integrated Monitoring Program in accordance with the requirement of CoA 216.   | OPEN   |

| Ref                | CoA        | Finding Category | Requirement   | Finding / Comment   | Recommendation   | Status |
|--------------------|------------|------------------|---|---|--|--------|
| 2018-2021_NC_27    | CoA 217    | Non-compliant    | <p>The program shall include, but is not limited to, the following matters:</p> <ul style="list-style-type: none"> <li>a) visitor access information – see conditions 135) and 156);</li> <li>b) the interpretive program, and whether it is achieving its goals (to include consideration of quality of visitor experience, visitor understanding and presentation performance) (condition 100);</li> <li>c) Aboriginal heritage – including the condition of physical sites (condition 70);</li> <li>d) non-Aboriginal heritage – including the condition of buildings and structures, landscape features, moveable heritage and conservation works progress (conditions 78) and 85);</li> <li>e) flora and fauna - including general monitoring during construction and operation phases, as well as specific strategies for monitoring threatened species, including the Little Penguin and the Long-nosed Bandicoot (conditions 167) and 177)-178);</li> <li>f) seagrasses (condition 184);</li> <li>g) soil and erosion (conditions 197)-198);</li> <li>h) noise (condition 199);</li> <li>i) stormwater management, including water quality (condition 104)</li> <li>j) infrastructure – consumption and capacity (water, sewer, gas, etc – condition 105);</li> <li>k) waste management (condition 203); and</li> <li>l) staff and contractor training – including induction programs (conditions 64) and 65) and emergency training (condition 206)</li> </ul> | An Integrated Monitoring Program had not been implemented for the Q Station to address the requirements of CoA 217 during the audit period.   | Refer to CoA 216.  | OPEN   |
| 2018-2021_NC_28    | CoA 220    | Non-compliant    | The co-proponents shall undertake a regular review of the overall integrated monitoring program concurrent with or prior to the ongoing comprehensive audits of the activity (condition 228). The review shall be undertaken in consultation with the relevant authorities. On the basis of the review the co-proponents shall, as necessary, prepare a revised program to be submitted to the DEC and DIPNR for approval.  | An Integrated Monitoring Program had not been implemented for the Q Station to address the requirements of CoA 217 during the audit period.   | Refer to CoA 216.  | OPEN   |
| NC_2018-2021_NC_29 | Schedule 5 | Non-compliant    | <p><b>Deaths of Long nosed bandicoots attributable to vehicles</b></p> <p>Road-deaths are taken to include any bandicoot remains identified on or next to roads. To begin within one month of the commencement date and to occur on site for the duration of the approval.</p> <p>Road deaths are to be recorded on a publicly accessible mortality register, noting basic morphological details (age, sex and condition), the date, the name of the recorder, microchip number of the animal (if present) and the location plotted using a GIS-based map (see also conditions 169A and 66). For the purposes of road mortality monitoring an adult Long-nosed Bandicoot is defined as: female – 450 grams or heavier; male –heavier than 650 grams73.</p>  | A publicly accessible Long-nosed Bandicoot mortality register was not available. The location of Long-nosed Bandicoot deaths plotted using a GIS-based map was not recorded.  | Prepare and implement a publicly accessible Long-nosed Bandicoot mortality register in accordance with the requirements of Schedule 5. | OPEN   |
| 2018-2021_NC_30    | CoA 219    | Non-compliant    | <p>As part of the annual environmental report (condition 221) and comprehensive audit (condition 226), the co-proponents shall produce a monitoring report outlining results from the integrated monitoring program. The report shall:</p> <ul style="list-style-type: none"> <li>a) include an analysis of monitoring results and trends collected over time; and</li> <li>b) identify measures taken or proposed to be undertaken to respond to any adverse or unexpected impacts identified.</li> </ul>  | <p>An Integrated Monitoring Report has not been provided for inclusion in this Audit Report. The auditees advise that monitoring reports have been provided to the Department separately and the Department raised comments on their content. The Auditor has not seen the Department's comments.</p> <p>The auditees advise that they are working on the reports to address the Department's comments.</p> | Finalise the monitoring report/s in line with the Department's comments.   | OPEN   |

| Ref             | CoA     | Finding Category | Requirement  | Finding / Comment   | Recommendation   | Status |
|-----------------|---------|------------------|--|---|--|--------|
| 2018-2021_NC_31 | CoA 155 | Non-compliant    | <p>Shuttle Bus</p> <p>The co-proponents shall provide a shuttle bus service to transport visitors between the Manly Town Centre and the site (see also condition 65). The shuttle bus shall:</p> <ol style="list-style-type: none"> <li>have a minimum capacity of 12 persons per trip;</li> <li>be operational within 6 months of the commencement date;</li> <li>provide a minimum of 3 trips to and from the site (total 6 trips) per day on weekends and public holidays during peak periods of visitor activity or as approved by the DEC. Preference is also to be given to operation of the shuttle bus service during periods of peak night visitation and activity for the Long-nosed Bandicoot.</li> </ol> <p>Full details of the shuttle bus operation shall be included in the Access Strategy (condition 118)</p>   | <p>There is no evidence of the shuttle bus providing services in line with this condition (due to limited uptake). The shuttle instead runs on an as needed basis. This information is advertised at Reception and in guest compendiums, however there is no formal evidence available that sets out the frequency of trips.</p>  | <p>Shuttle movements should be recorded to confirm whether the frequencies required by this condition are in fact being achieved or not.</p> <p>If demand for the shuttle does not exist, then a case should be put forward to alter this condition so as to better align with customer demand.</p>          | OPEN   |
| 2018-2021_NC_32 | CoA 61  | Non-compliant    | <p>Environmental Management System</p> <p>Contractors engaged in the undertaking of the activity must be able to demonstrate a commitment to environmental management. Demonstration should be by way of commitment to a recognised Environmental Management System in accordance with NSW Government guidelines and/or a proven satisfactory environmental management performance record.</p>   | <p>The Department requested, in its comments on the draft Audit Report, further evidence to demonstrate compliance with this condition. The auditees noted that many contractors' activities have negligible environmental impact (e.g.: service staff etc.). However the auditees did indicate that an Environmental Management Plan and Policy was able to be provided by Accor (the main operator), setting out its commitment to environmental performance. This information was not provided prior to the finalisation of this Report.</p> | <p>Develop procurement processes that ensure contractors engaged in the undertaking of the activity demonstrate a commitment to environmental management.</p>  | OPEN   |
| 2018-2021_NC_33 | CoA 65  | Non-compliant    | <p>Training for Contractors and Staff Working on Heritage Site</p> <ol style="list-style-type: none"> <li>An induction and training program shall be developed by a suitably qualified person and provided to the following persons within 1 week of those persons commencing duties/works: <ul style="list-style-type: none"> <li>all contractors and sub-contractors, who will be required to attend such a program through the provision of a clause in all contracts for on-site works; and</li> <li>all staff employed on the site, including but not limited to shuttle bus driver(s) and ferry crew, whether on a permanent, temporary, contract or casual basis. Staff working on the site for a period longer than 12 months must undertake a refresher program every year. The program shall include, but not be limited to, an environmental management module outlining the natural and cultural heritage significance of the site and procedures to be followed while working on site.<sup>36</sup>; and</li> </ul> </li> <li>an education and awareness program shall be developed and provided by a suitably qualified person for companies providing services such as, but not limited to, coach and bus access, service delivery and other regular vehicle access to the site within one month of them accessing the site.</li> </ol> | <p>Evidence of annual refreshers having been delivered to all staff and contractors was not available.</p>  | <p>Retrieve evidence of annual refreshers, or implement a training program that includes annual refresher training outlining the natural and cultural heritage significance of the site and procedures to be followed while working on site</p>  | OPEN   |
| 2018-2021_NC_34 | CoA 221 | Non-compliant    | <p>Annual Environmental Report</p> <p>An annual environmental report for the activity shall be prepared by the co-proponents and submitted to the DEC, DIPNR, NSW Heritage Council, Waterways Authority, NSW Fisheries and the Quarantine Station Community Committee for comment. In reviewing the annual environmental report these organisations are to specifically consider issues associated with visitor impacts arising from the activity</p>  | <p>According to correspondence between NPWS, Mawland and the Department in April 2021 (and as per the Department's comments on the draft Audit Report), Annual Environmental Reports for 2019 and 2020 were not submitted until after the Department wrote to the co-proponents in April 2021.</p>  | <p>In accordance with the direction provided by the Department in their letter to NPWS on 8 November 2021 the following environmental reports were available for review:</p> <ul style="list-style-type: none"> <li>1 January 2020 to 31 December 2020.</li> <li>1 July 2018 to 31 December 2019.</li> </ul> | CLOSED |

| Ref                 | CoA     | Finding Category | Requirement  | Finding / Comment   | Recommendation  | Status |
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| 2018-2021_NC_35     | CoA 223 | Non-compliant    | The co-proponents shall submit the first environmental report approximately 12 months after the commencement date, although this may be adjusted if agreed by the DEC to match the end of the calendar or financial years or to coincide with the staging plan (condition 31), and at annual intervals thereafter. No annual report is required in the year that a comprehensive audit is due (condition 228). | According to correspondence between NPWS, Mawland and the Department in April 2021 (and as per the Department's comments on the draft Audit Report), Annual Environmental Reports for 2019 and 2020 were not submitted until after the Department wrote to the co-proponents in April 2021.   | In accordance with the direction provided by the Department in their letter to NPWS on 8 November 2021 the following environmental reports were available for review: <ul style="list-style-type: none"> <li>1 January 2020 to 31 December 2020.</li> <li>1 July 2018 to 31 December 2019.</li> </ul>                   | CLOSED |
| 2018-2021_NC_36     | CoA 228 | Non-compliant    | 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).                               | The 2018 Independent Audit was not undertaken within 5 years of the preceding audit (completed in 2011). The 2018 Report notes that 'The extension for the audit to include the additional year and a half to the EOFY 2018 has been requested by NPWS due to a delay in modifications to planning approvals'. The 2011 Report does not capture this as a non-compliance. The Auditor is not aware of any such extension having been granted by the Department. | The 2018 Independent Audit Report was submitted after the fact. This 2021 Independent Audit Report resets the 5-year frequency.   | CLOSED |
| <b>Observations</b> |         |                  |  |   |   |        |
| 2018-2021_OBS_01    | CoA 08  | Observation      | <b>Complaints Register</b><br>The co-proponents shall record details of all complaints received, and actions taken and response times. The Complaints Register shall be made available to: the Environmental Manager at the end of each week; the auditor for the purposes of the comprehensive audit (condition 226); and at other times as requested by relevant NSW Government agencies.                    | The co-proponents do not share a complaints register.   | Consideration should be given to sharing a complaints register to allow for greater transparency, coordination and management of complaints that may affect the co-proponents.  | OPEN   |
| 2018-2021_OBS_02    | CoA 27  | Observation      | Timber buildings shall not be used for the storage of fuel or other flammable materials.   | Flammable goods cabinets in Building CP5 Maintenance Shed and A23 (Linen Store) were observed to be unlabelled. The Maintenance Shed and A23 are not timber buildings.  | Evidence the flammable cabinets had been labelled was provided to the Auditor on 10 February 2022 Refer to Appendix F.<br>Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that all flammable chemicals had been removed from building A24. | CLOSED |
| 2018-2021_OBS_03    | CoA 42  | Observation      | Prior to commencement of any work on or associated with the Quarantine Station wharf, or the commencement of the ferry service at the wharf, the co-proponents shall lodge an Application for Construction of Waterside Structures to the Waterways Authority for approval. This application must be submitted to the Heritage Advisor for endorsement prior to lodgement with the Waterways Authority.        | One rotted sleeper and a number of other partially decayed sleepers were observed on the Wharf during the site inspection Temporary wooden sheeting had been placed along one side to manage access, and to avoid trips and falls.<br>An email from an engineering firm in July 2019 identified a scope of work and measures to repair the Wharf; however, this work was not conducted during the audit period.   | Repair work to the Wharf should be conducted in consultation with TfNSW.  | OPEN   |



| Ref                  | CoA              | Finding Category | Requirement  | Finding / Comment   | Recommendation  | Status |
|----------------------|------------------|------------------|--|---|---|--------|
| 2018-2021_<br>OBS_04 | CoA 78           | Observation      | <p>The co-proponents shall prepare and submit a final Conservation Works Program (CWP) to the Heritage Council and the DEC for approval as follows:</p> <p>a) Stage 1 of the CWP encompassing works required for all buildings, structures and landscape elements, including but not limited to those identified in the DACMP and the asbestos sampling and replacement strategy (condition 111), shall be prepared within six months of the commencement date; and</p> <p>b) Stage 2 of the CWP encompassing all works identified for Aboriginal sites (condition 70), the Moveable Heritage and Resources Plan (condition 85), Heritage Landscape Master Plan (condition 91), Inscriptions Plan (Condition 95), Interpretation Plan (condition 100) and Infrastructure Control Plan (as relevant – condition 105) shall be prepared and incorporated into the CWP as soon as practicable.</p>  | <p>The Conservation Works Program Stage 1 was prepared for priority works to be conducted within one to four months of approval.</p> <p>The forecast maximum time periods for each stage was: Stage 1 – 4 months; Stage 2 – 8 months; Stage 3 – 6 months; and Stage 4 – 6 months. This equated to a two-year period.</p> <p>CWPs for Stages 2, 3 and 4, whilst technically outside the audit period, were not available for review by the Auditor. Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response NPWS states that CWPs for stages 2 and beyond were never prepared.</p> | Review and update the final Conservation Works Program (CWP) to address stages 2 and beyond, and submit it to Heritage NSW and NPWS for approval.   | OPEN   |
| 2018-2021_<br>OBS_05 | CoA 99           | Observation      | <p><b>Internal Fit out</b></p> <p>The co-proponents shall engage a suitably qualified and experienced person to prepare a site wide plan for internal building fitout within 12 months of the commencement date. The plan shall be reviewed by the Heritage Advisor and submitted to DEC and the Heritage Council for approval. All internal fittings installed across the site must be consistent with the adopted plan.</p> <p>The Plan shall:</p> <p>a) outline the specifications and style of all new plumbing, telecommunication and electrical fittings, and floor coverings to be installed across the site. It must include taps, spouts, shower heads, basins, baths, toilets, electrical fittings, carpets and floor tiling, etc, and demonstrate consistency with the relevant policies of the DACMP; and</p> <p>b) outline an approach to sampling of bathroom and toilet fitouts across the site from the 1958-62 period, taking into account the relevant policies of the DAC</p> | The Internal Fitout Plan – Part 1 has not been updated since November 2005.   | Review and update the Internal Fitout Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets. | OPEN   |
| 2018-2021_<br>OBS_06 | CoA 111          | Observation      | <p><b>Asbestos and Rainwater System</b></p> <p>The co-proponents shall 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 strategy shall be reviewed by the Heritage Advisor and submitted to the DEC and the Heritage Council for approval.</p> <p>The strategy shall include a prioritised schedule of replacement works, to be incorporated into the Conservation Works Program (condition 78).</p>  | The Asbestos Cement Sampling Strategy included in the Conservation Works Program has not been updated since March 2006. The Declaration and Approval page of the of the Conservation Works Program - Stage 1 was not signed indicating that had not been approved by the Heritage Council and DEC.  | A review of the Asbestos Cement Strategy should be conducted.   | OPEN   |
| 2018-2021_<br>OBS_07 | <i>Not used.</i> |                  |  |   |   |        |

| Ref              | CoA     | Finding Category | Requirement  | Finding / Comment   | Recommendation   | Status |
|------------------|---------|------------------|--|---|--|--------|
| 2018-2021_OBS_08 | CoA 112 | Observation      | <p><b>Outdoor Visitor Infrastructure</b></p> <p>The co-proponents shall prepare a site-wide-plan for outdoor visitor infrastructure prior to the installation of any outdoor visitor infrastructure. The plan shall be reviewed by the Heritage Advisor and submitted to the DEC and the Heritage Council for approval. The plan shall demonstrate consistency with other relevant site-wide plans such as the Interpretation Plan and Heritage Landscape Master Plan, and address, but not be limited to:</p> <p>a) the proposed location, design and materials of the external lighting system, to include any emergency lighting. Lighting should have regard to the following principles:</p> <ul style="list-style-type: none"> <li>the avoidance of light spill in areas of high-use Longnosed Bandicoot foraging habitat (as identified in Illustration 15 of the DACMP or the revised habitat assessment – condition 165) and Little Penguin habitat<sup>43</sup></li> <li>the use of lights in the red-orange spectral range in the Wharf Precinct</li> <li>minimising light spill across the site and outside of the site</li> </ul> <p>b) the proposed location and design of waste receptacles, including fauna-proof bins;</p> <p>c) the proposed location, design and materials for signage, to include proposed text, style, graphics, and colours;</p> <p>d) a consideration of the environmental impacts of the specific locations and methods of installation for each element of outdoor visitor infrastructure; and</p> <p>compliance with relevant industry guidelines, codes, Australian Standards and the Building Code of Australia (BCA).</p> | The Outdoor Visitor Infrastructure Plan has not been updated since February 2008.   | Review and update the Outdoor Visitor Infrastructure Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.   | OPEN   |
| 2018-2021_OBS_09 | CoA 146 | Observation      | <p><b>Road Based Access</b></p> <p>The devices shall be in accordance with the endorsed design standards [condition 106) c)], spaced at appropriate distances apart and sign-posted with the speed limit (15 km/h) and Long-nosed Bandicoot warning/awareness signs.</p>   | Other than staff, contractors and disabled visitors no one else is permitted to drive within the Q Station; however, no signposts displaying the 15 km/h speed limit were observed at traffic calming devices at the time of the site inspection. | Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that six (6) 15km/h speed zone signs had been erected.  | CLOSED |
| 2018-2021_OBS_10 | CoA 164 | Observation      | <p><b>Long-nosed Bandicoot</b></p> <p>Grassed areas on the site must be kept in good condition. No fertilisers or chemicals should be applied to open grassed areas, except where this is essential to the repair and stabilisation of existing eroded areas and is consistent with the provisions of the approved Heritage Landscape Master Plan (condition 91).</p>  | A shoulder garden pressure sprayer was observed in the Maintenance Shed at the Glasshouse (A24). Handwritten on the sprayer in marker were the words 'Poison Roundup'.  | Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that RoundUp had been removed from site. Mawland also states that it is of the view that RoundUp had not been used since 2016. No evidence was sighted by the Auditor to support this position. | CLOSED |
| 2018-2021_OBS_11 | CoA 165 | Observation      | <p>Within 12 months of the commencement date the co-proponents shall undertake further assessments 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. The outcomes of the assessment should be informed by the monitoring program specified in Schedule 5 and are to be submitted to the DEC for approval and incorporated into the Heritage Landscape Management Plan (condition 91) prior to any habitat works commencing.</p>  | An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population was conducted.   | The outcomes of the finalised Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population should be incorporated into an updated Heritage Landscape Management Plan (CoA 91).  | OPEN   |

| Ref              | CoA      | Finding Category | Requirement   | Finding / Comment  | Recommendation  | Status |
|------------------|----------|------------------|---|--|---|--------|
| 2018-2021_OBS_12 | CoA 170  | Observation      | <p><u>Calculating the background level of adult road mortalities</u></p> <p>For the first year following the commencement date the background adult road mortality level is set at 10 deaths<sup>64</sup> in 6 consecutive months. The background adult road mortality level is to be recalculated at the end of each consecutive year of mortality monitoring as detailed in Schedule 7.</p>   | <p>Long-nosed Bandicoot mortality numbers are not reported in the monitoring program reports. Instead, mortality numbers are managed by the NPWS Saving Our Species team.</p>  | <p>Consideration should be given to including mortality numbers in the monitoring reports to provide greater context to the Long-nosed Bandicoot population in one consolidated document.</p>                           | OPEN   |
| 2018-2021_OBS_13 | Not used |                  |   |  |   |        |
| 2018-2021_OBS_14 | CoA 183  | Observation      | <p><b>Marine Environment</b></p> <p><u>General</u></p> <p>Within 6 months of the commencement date the co-proponents shall commence 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. Other relevant stakeholders shall also be consulted. As a minimum, options for restricting or discouraging mooring should generally target the “patchy seagrass” area shown in Figure 1 of Appendix F of the EIS. However, if critical habitat is declared for the Little Penguin population the provisions of the critical habitat listing will take precedence over any other measures.</p> | <p>Only two yellow markers were observed to delineate the no mooring area for the seagrass meadow and Little Penguins.</p> <p>NPWS notes that the moorings reside outside the land defined under the CoA and lease. The moorings are the responsibility of TfNSW. NPWS is actively working with TfNSW as well as DPI Fisheries to improve the visibility of the demarcation line.</p> <p>Refer also to the finding in relation to CoA 184 below.</p>   | <p>Continue to work with TfNSW and DPI to reduce risk of private boat mooring in the immediate vicinity of the site.</p>  | OPEN   |
| 2018-2021_OBS_15 | CoA 184  | Observation      | <p><u>Monitoring</u></p> <p>The co-proponents shall 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. Details of the methods and approaches to be used in monitoring seagrass beds will be submitted to NSW fisheries for approval prior to monitoring commencing.</p>   | <p>In 2007 the NSW DPI reviewed the pilot seagrass surveys and determined that there were impacts on seagrass at this time as a result of propellers and anchors at Quarantine Bay. DPI also stated at that time that no further seagrass monitoring was warranted as it would unlikely provide significant environmental outcomes in the long term.</p> <p>Despite this it appears as seagrass monitoring continued in an informal manner through 2018-2019. The Auditor is not aware of the rationale or reasoning for this. Monitoring reports were available for 2018 and 2019; however, monitoring was not conducted in 2020 and 2021 due to COVID-19 restrictions. The reports do not refer to the monitoring methodology, such the use of GPS, survey quadrants or sample analysis. The conclusions from the monitoring undertaken are not tracked or trended year-on-year and provide only commentary concerning the visual condition of the seagrass.</p> | <p>Confirm the requirement to complete seagrass monitoring. Should ongoing monitoring be required, this should be conducted in accordance with a formally developed program, prepared in consultation with NSW DPI.</p> | OPEN   |
| 2018-2021_OBS_16 | CoA 197  | Observation      | <p>As part of the EMP, the co-proponents shall prepare and implement an <b>Erosion and Sedimentation Control Plan</b> to be implemented for all works that involve ground surface disturbance. The plan will be prepared in accordance with the guideline “Managing Urban Stormwater – Soils and Construction” (DoH 1998), but with adaptations as necessary and appropriate for the Quarantine Station site.</p>   | <p>The Erosion and Sedimentation Control Plan has not been updated since 2005 and does not reflect the current site conditions and works conducted since 2005.</p>   | <p>Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</p>            | OPEN   |



| Ref                  | CoA     | Finding Category | Requirement   | Finding / Comment   | Recommendation  | Status |
|----------------------|---------|------------------|---|---|---|--------|
| 2018-2021_<br>OBS_17 | CoA 199 | Observation      | <p><b>Noise</b></p> <p>As part of the EMP, the co-proponents shall prepare and implement a Noise Management Plan for both the construction and operation phases of the activity. The plan should include, but not be limited to:</p> <ol style="list-style-type: none"> <li>standards to be met, consistent with relevant EPA guidelines;</li> <li>noise mitigation measures, including educational signage for visitors entering and exiting the site;</li> <li>regular monitoring of both construction and operational activities. This is to include: <ul style="list-style-type: none"> <li>noise generated from on-site activities, measured both within the site and off-site</li> <li>road traffic noise during peak periods of vehicle movements to and from the site, especially in the vicinity of residential areas along Darley Road and Manly Hospital; and</li> </ul> </li> <li>adaptive management measures.</li> </ol>                                  | The Noise Management Plan is over 15 years old.   | The Noise Management Plan should be reviewed and updated where required to align with current legislation, legislative requirements as well as the current site conditions and management arrangements as well as any requirements from MP08_0041 MOD 03. | OPEN   |
| 2018-2021_<br>OBS_18 | CoA 203 | Observation      | <p><b>Waste Management Plan</b></p> <p>As part of the EMP, the co-proponents shall prepare and implement a Waste Management Plan to address the handling, stockpiling and disposal of wastes and construction materials during all phases of the activity. The plan shall include, but not be limited to, the following:</p> <ol style="list-style-type: none"> <li>procedures to ensure that demolition and construction materials are stockpiled clear of environmentally sensitive areas;</li> <li>waste avoidance and reduction measures, including strategies for recycling and re-use of waste materials;</li> <li>procedures for the removal and disposal of waste at an appropriately licensed facility, including asbestos material;</li> <li>on-site education and signage to promote and encourage "no feeding" rules for wildlife and appropriate waste disposal procedures; and</li> </ol> <p>procedures for regular litter inspection and collection.</p> | The Waste Management Plan has not been updated since 2005 and includes references to superseded legislation and guidelines. | Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.   | OPEN   |

| Ref                  | CoA     | Finding Category | Requirement  | Finding / Comment  | Recommendation  | Status |
|----------------------|---------|------------------|--|--|---|--------|
| 2018-2021_<br>OBS_19 | CoA 205 | Observation      | <p><b>Emergency and Evacuation Plan</b><br/>Prior to the commencement date the co-proponents shall submit an <b>Emergency and Evacuation Plan</b> for the site to the DEC for approval. The plan will be prepared in consultation with the NSW Ambulance Service, NSW Police and NSW Fire Brigade and shall address, but not be limited to:</p> <ul style="list-style-type: none"> <li>a) emergency and/or evacuation procedures for a range of incidents, including spillages, boat collisions, fire, bomb threats, power blackout, personal injury, disturbance to human burial sites, etc;</li> <li>b) interim site fire safety measures to be provided until the upgrade of the fire hydrant system has been completed (condition 211);</li> <li>c) safety and emergency signage;</li> <li>d) an emergency alarm system;</li> <li>e) the location of evacuation points and an evacuation procedure;</li> <li>f) regular testing of the system;</li> <li>g) emergency equipment and appropriate storage locations;</li> <li>h) staff training; and</li> <li>i) emergency contact details for relevant staff.</li> </ul> <p>Once approved, the co-proponents shall implement the plan.</p> | It was not clear how the Emergency Manual (2019) aligned with the Emergency Evacuation Plan (2005).      | Review both documents to ensure there is no duplication of requirements. Confirm which document addresses the requirements of CoA 205.                                | OPEN   |
| 2018-2021_<br>OBS_20 | CoA 205 | Observation      | <p><b>Emergency and Evacuation Plan</b><br/>Prior to the commencement date the co-proponents shall submit an <b>Emergency and Evacuation Plan</b> for the site to the DEC for approval. The plan will be prepared in consultation with the NSW Ambulance Service, NSW Police and NSW Fire Brigade and shall address, but not be limited to:</p> <ul style="list-style-type: none"> <li>j) emergency and/or evacuation procedures for a range of incidents, including spillages, boat collisions, fire, bomb threats, power blackout, personal injury, disturbance to human burial sites, etc;</li> <li>k) interim site fire safety measures to be provided until the upgrade of the fire hydrant system has been completed (condition 211);</li> <li>l) safety and emergency signage;</li> <li>m) an emergency alarm system;</li> <li>n) the location of evacuation points and an evacuation procedure;</li> <li>o) regular testing of the system;</li> <li>p) emergency equipment and appropriate storage locations;</li> <li>q) staff training; and</li> <li>r) emergency contact details for relevant staff.</li> </ul> <p>Once approved, the co-proponents shall implement the plan.</p> | A spill kit was observed to be obstructed by cleaning equipment in Building A23.<br>Refer to Appendix F. | Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that this deficiency had been rectified. | CLOSED |

| Ref              | CoA        | Finding Category | Requirement  | Finding / Comment  | Recommendation  | Status |
|------------------|------------|------------------|--|--|---|--------|
| 2018-2021_OBS_21 | CoA 211    | Observation      | <p><b>Fire Safety</b></p> <p>The co-proponents shall also undertake the following fire safety measures:</p> <p>a) all buildings are to be brought up to BCA standards for fire safety (or an acceptable alternative). This shall occur in stages to match the staging plan for works, as amended by condition 31);</p> <p>b) an upgrade of the fire hydrant system to meet NSW Fire Brigade standards shall be completed within 5 years of the commencement date. In the meantime, the co-proponents shall ensure that the fire measures detailed in the emergency and evacuation plan (condition 205) are in place and functioning;</p> <p>c) an annual fire safety statement of the site buildings, prepared in accordance with the NPWS Construction Assessment &amp; Approvals Procedure, shall be submitted for DEC approval; and</p> <p>d) the co-proponents shall comply with the terms of any fire safety order issued by or on behalf of the DEC.</p> | <p>The Auditor notes that requirements a) and b) are understood to have occurred prior to the audit period and have been assumed to have been addressed at the time specified and were therefore not assessed as part of this audit.</p> <p>The Auditor is not a fire safety expert. An Annual Statement of Maintenance Compliance for January 2021 – January 2022 was sighted. It confirms that maintenance was carried out in accordance with AS1851.</p> <p>However: The Annual Statement of Maintenance Compliance notes that <i>'This is not an Annual Fire Safety Statement. As we are not the owner or agent for this building, we are unable to provide an Annual Fire Safety Statement. This statement will give you the information required to complete your own Annual Fire Safety Statement.'</i> Therefore the Annual Statement of Maintenance Compliance does not appear to satisfy requirement c) of this condition.</p> <p>The Auditor is not aware as to whether any Annual Fire Safety Statement has been submitted to NPWS, nor whether that Statement had been approved by the NPWS, or whether orders were issued by NPWS.</p> | <p>Confirm whether all buildings have been brought up to current BCA standards for fire safety (or an acceptable alternative).</p> <p>Confirm whether the fire hydrant systems meet NSW Fire Brigade standards.</p> <p>Obtain an Annual Fire Safety Statement and issue to NPWS for approval.</p> | OPEN   |
| 2018-2021_OBS_22 | CoA 212    | Observation      | <p><b>Bushfire Management Plan</b></p> <p>The co-proponents are 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.</p>   | <p>The Annual Environmental Reports for 2018-2019 and 2020 note that a Bushfire Assessment was prepared for the site in July 2006 by Fire Base Consulting Pty but that no update had occurred since that time.</p>   | <p>The Bushfire Management Plan should be reviewed and updated in consultation with relevant authorities.</p>   | OPEN   |
| 2018-2021_OBS_23 | CoA 224    | Observation      | <p>The annual environmental report shall:</p> <p>a) state how the co-proponents have complied with relevant approval conditions;</p> <p>b) include the outcomes of the annual monitoring report (condition 219);</p> <p>c) state any measures taken or proposed by the co-proponents to respond to issues arising from:</p> <ul style="list-style-type: none"> <li>• the integrated monitoring program</li> <li>• consultations with the community; and</li> </ul> <p>state any recommendations from the co-proponents regarding the undertaking of the activity, if considered necessary.</p>   | <p>Direction 3 from the Department to NPWS dated 8 November 2021 noted that the Department did not consider that the annual environmental reports supplied [to the Department] on 30 April 2021 satisfied the relevant Approval conditions (CoA 221 to CoA 225) and directed NPWS to submit by 21 January 2022 revised annual environmental report for the periods 1 July 2018 to 31 December 2019 and 1 January 2020 to 31 December 2020.</p>   | <p>Annual Environmental Reports had been prepared as required by Direction 3.</p>   | CLOSED |
| 2018-2021_OBS_24 | Not used   |                  |  |  |   |        |
| 2018-2021_OBS_25 | Schedule 3 | Observation      | <p>Full details of the proposed design and layout of the water reservoirs and associated infrastructure are to be submitted to the DEC. This shall include evidence of consultation with Sydney Water (condition 16).</p>  | <p>The fence to the open reservoir on Entrance Road was observed to be broken. Given the Q Station is open to the public there exists the potential for a person to enter the reservoir area. No signs warning of the water hazard were observed. No lifebuoys or other water rescue equipment or means of egress were observed in the vicinity of the reservoir.</p>  | <p>Evidence the fence to the open reservoir had been repaired and a sign warning of deep water was provided to the Auditor on 10 February 2022. Refer to Appendix F.</p>  | CLOSED |

Table 9: Management plan audit findings

| Ref             | Management Plan   | Finding Category | Requirement | Finding / Comment   | Recommendation  | Status |
|-----------------|---|------------------|-------------|---|---|--------|
| 2018-2021_MP_01 | Environmental Management Plan, May 2005, Version 12 (EMP) | Observation      | -           | A comprehensive environmental incident response protocol is provided in the EMP. MP08_0041 and the EMP do not provide the definition of an incident and a number of the recorded incidents during the audit period may be considered as maintenance issues rather than an actual incident as defined by other State Significant Developments. | In the update to the EMP [and other management plans] consideration should be given to defining incidents and near misses to better categorise recorded issues or events. | OPEN   |

### 5.3 Other matters considered relevant by the Auditor or DPE

As stated in Section 3 the Auditor consulted with the Department and other relevant agencies and stakeholders. Each of the issues raised along with the Auditor's findings in relation to these requests are presented in Section 3.2.

The Auditor considers there to be three overarching reasons for the number of findings identified in the comprehensive audit.

1. Confusion concerning the responsibility and accountability of MP08\_0041 requirements between the co-proponents. The co-proponents do not share a document management system making it difficult for both parties to access and share key operational and compliance documentation which also results in a lack of transparency as to what the other proponent is doing. This makes any collaborative process cumbersome as the public and private nature of the arrangement means both parties have to operate in accordance with their own policies, procedures and operating systems.
2. Until Direction 3 was issued by the Department on 8 November 2021 previous Comprehensive Audit Reports and Annual Environmental Reports did not fully address overall compliance with MP08\_0041. The acceptance and limited feedback concerning these previous reports by the relevant government agencies and stakeholders may have been construed by the co-proponents that compliance with the MP08\_0041 was being achieved and that there were no issues of concern from a regulatory point of view.
3. Many of the findings stem from not having reviewed the originally approved management plans and sought the necessary re-approval of those revised plans from the relevant agencies. This is essentially an administrative and responsibilities allocation issue related also to points 1 and 2 above. It is noted that the co-proponents are aware that the plans require a comprehensive update and it was reported that discussions had been held in February 2022 with the Department to discuss this issue. The parties intend to commit to each other and the Department to conduct a full review of the Site Wide and other plans referred to in this document before the end of 2022, in conjunction with the new Purchaser of the Lease and Business to create flexible, living and modern documents which will enhance the site's use.

The Department noted, in its comments on the draft Audit Report, that:

- throughout the audit period, the co-proponents were aware of the Department's concerns regarding compliance with the monitoring and auditing program requirements (refer Section 4.8)
- the Department considers the finding regarding not having reviewed the initial management plans to be also applicable to not having reviewed the management systems / programs and monitoring data / reports, and not having an Environmental Manager or Heritage Advisor fully oversee site activities. The Department considers the commentary regarding the co-proponents' intentions for 2022 to be outside the audit scope.

The Auditor acknowledges the Departments comments and has identified these matters where the Auditor considers them to be valid. Nevertheless the Auditor is of the view that the commitment provided by the co-proponents is relevant with respect to proposed actions to address the deficiencies identified.

## 6. CONCLUSION

This is the fourth audit of the Quarantine Station and while CoA 228 requires a comprehensive audit every five years, the previous audit report (SNC Lavalin, 2018) provided for an “*additional year and a half to the EOFY 2018*”. Accordingly, Direction 3 reduces the current audit period by a year and a half.

The site component of the comprehensive audit was undertaken on 3 February 2022.

Five findings from the previous audit (2018) were closed while five findings remained open during the audit period.

Whilst this is the fourth audit it is the first to assess compliance with all of the CoAs as requested by Direction 3. The findings therefore reflect a level scrutiny not previously applied by the previous audits. In relation to MP08\_0041 the following was identified:

- A total of 289 CoAs from Schedules 1 through 9 were assessed.
- A total of 161 CoAs were compliant.
- A total of 33 CoAs were non-compliant.
- A total of 95 CoAs were not triggered.
- A total of 22 CoAs (classified as either compliant or not triggered) had observations identified.

The findings were typically of an administrative compliance nature (i.e., related to out-of-date plans, absence of GIS system, incomplete monitoring records, poorly integrated systems and processes, poorly defined accountabilities and responsibilities for implementation of CoA etc). There were only a small number of findings made with the potential for low environmental or community impacts.

Management plans are generally dated 2003 – 2008. An internal review of some plans had been conducted in 2010, 2011 and 2012; however, this review had not progressed to having the plans formally updated, reviewed by their co-proponent and any relevant stakeholder and then submitted for approval by the Department.

Given their age the management plans include references to now outdated proposed forecasts and activities for the Q Station (e.g. waste predications for operations, proposed car numbers) as well as superseded legislation and guidance documents. The plans also lack formal document control to allow the reader to understand when and what updates occurred. Some plans are presented as draft or final draft. Elements of the plans appear to be implemented on an ad-hoc basis; however, given their age and references to proposed activities (such as construction), specific mitigation measures were difficult to assess. The structure of management plans could be improved so as to highlight management actions that can be easily identified, implemented and reported and audited against.

Given over 15 years of operations has occurred since the management plans were prepared a comprehensive review of all management plans should be conducted to verify that they align with current legislative requirements, site conditions and arrangements, roles and responsibilities and objectives and targets.

It is noted that the co-proponents are aware that the plans require a comprehensive update and it was reported that discussions had been held in February 2022 with the Department to discuss this issue. The parties intend to commit to each other and the Department to conduct a full review of the Site Wide and other plans referred to in this document before the end of 2022, in conjunction with the new Purchaser of the Lease and Business to create flexible, living and modern documents which will enhance the site's use.

In conclusion the Auditor considers there to be three overarching reasons for the number of findings identified in the comprehensive audit.

1. Confusion concerning the responsibility and accountability of MP08\_0041 requirements between the co-proponents. The co-proponents do not share a document management system making it difficult for both parties to access and share key operational and compliance documentation which also results in a lack of transparency as to what the other proponent is doing. This makes any collaborative process cumbersome as the public and private nature of the arrangement means both parties have to operate in accordance with their own policies, procedures and operating systems.
2. Until Direction 3 was issued by the Department on 8 November 2021 previous Comprehensive Audit Reports and Annual Environmental Reports did not fully address overall compliance with MP08\_0041. The acceptance and limited feedback concerning these previous reports by the relevant government agencies and stakeholders may have been construed by the co-proponents that compliance with the MP08\_0041 was being achieved and that there were no issues of concern from a regulatory point of view.
3. Many of the findings stem from not having reviewed the originally approved management plans and sought the necessary re-approval of those revised plans from the relevant agencies. This is essentially an administrative and responsibilities allocation issue.



## 7. LIMITATIONS

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# **APPENDIX A – PROJECT APPROVAL CONDITIONS OF CONSENT**

| Unique ID  | Requirement  | Evidence  | Findings and Recommendation   | Compliance Status |
|------------|--|---|---|-------------------|
| SCHEDULE 1 |  |   |   |                   |
| General    |  |   |   |                   |
| 1          | <p><b>Documents to be complied with</b></p> <p>1. The activity shall be generally carried out in accordance with the Environmental Impact Statement (EIS) "Proposal for the Conservation and Adaptive Re-use, North Head Quarantine Station, Sydney Harbour National Park", Volumes 1-5, dated 7 September 2001, except where modified by:</p> <ul style="list-style-type: none"> <li>a) the proposal, including plans, safeguards and mitigation measures, presented in the Preferred Activity Statement (PAS) prepared by the co-proponents dated September 2002;</li> <li>b) preliminary details for the proposed adaptation of Building A6 provided by the co-proponents in a facsimile dated 14 October 2002 and in the paper dated 31 October 2002;</li> <li>c) the variations proposed to the PAS by the co-proponents in a letter dated 12 November 2002; and</li> <li>d) the conditions of this approval (which incorporate the conditions of concurrence and approval granted by the NSW Heritage Council, Minister for Fisheries, Minister for the Environment and the Minister for Infrastructure, Planning and Natural Resources)</li> <li>e) any future variations to the PAS proposed for the site, that are supported by the OEH and Heritage Council, provided that such variations reflect the key site activities approved for the site (see 'Definitions'); and</li> <li>f) all documentation submitted in support of the modification request (MP08_0041 MOD 3), including <i>Environmental Assessment</i> prepared by Linchpin Environmental (dated August 2015) and <i>Responses to Submissions and Correspondence from Planning</i> prepared by Mawland Group (dated September 2017).</li> </ul> | Evidence referred to elsewhere in this Audit Table and the Main Report  | Compliance is verified in part through this comprehensive audit process. The documents were generally being used for the Project.   | Compliant         |
| 2          | In the event of any inconsistency with the EIS, PAS and documentation submitted in support of the modification request (MP08_0041 MOD 3), the conditions of approval specified in this schedule and schedules 2 to 9 shall prevail.  | Evidence referred to elsewhere in this Audit Table and the Main Report  | No inconsistencies with the EIS, PAS and documentation submitted in support of MP08_0041 MOD 3 were identified.   | Not Triggered     |
| 3          | <p><b>Compliance with Conditions</b></p> <p>It shall be the ultimate responsibility of the co-proponents to ensure compliance with the conditions of this approval and to ensure compliance by staff and contractors. The conditions do not relieve the co-proponents of the obligation to obtain all other approvals from relevant authorities required under any other legislation.</p>  | Evidence referred to elsewhere in this Audit Table and the Main Report  | <p><b>Numerous non-compliances were identified during the comprehensive audit of MP08_0041. Most of the non-compliances are administrative in nature.</b></p> <p><b>During the overarching update of management plans and systems, consideration should be given to developing and implementing a RACI matrix, or similar for each CoA to enable a better understanding of responsibilities between the co-proponents.</b></p>  | Non-compliant     |
| 4          | <p><b>Dispute Resolution</b></p> <p>In the case of a dispute between the co-proponents and any public authority, company or person in the implementation of the conditions of approval, the matter shall be referred to the Department of Environment and Conservation (DEC) in the first instance. If the DEC is unable to resolve the dispute and/or is of the view that further consideration is justified the matter will be referred to the Department of Infrastructure, Planning and Natural Resources (DIPNR). If the matter is still unable to be resolved it shall then be referred to the Minister for the Environment and the Minister for Infrastructure, Planning and Natural Resources for final resolution</p>   | Auditee Interview 03/02/22  | Mawland management reported that there was one dispute with NPWS concerning the North Head hazard reduction burn on 17 October 2020 that spilled over containment lines and resulted in the Q Station being evacuated. At the time of the audit the dispute was with Crown solicitors for determination.  | Compliant         |
| 5          | <p><b>Public Information</b></p> <p>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.</p>  | <a href="http://www.environment.nsw.gov.au">www.environment.nsw.gov.au</a> – North Head Q Station Management Plans [Accessed 10/01/22 @10:50am] | <p><b>The Environmental Management Plan (V12, 2005) and monitoring reports and data were not available publicly available at the time of the audit.</b></p> <p><b>Final reports, reviews, plans and monitoring data referred to in the conditions of approval to be publicly available, where there exists no commercially confidential information.</b></p> <p>The Environment, Energy and Science Group's (EES) website for the Q Station is the location where management plans and reports are made publicly available.</p> | Non-compliant     |

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| 6                   | <p><b>Contact</b></p> <p>Prior to the commencement date, the co-proponents shall establish and publicise a contact telephone number, which would enable any member of the general public to reach a person who can arrange appropriate response actions to any queries or complaints received</p>  | <p><a href="http://www.qstation.com.au">www.qstation.com.au</a> [Accessed 11/01/22 @3:10pm]</p> <p><a href="http://www.nationalparks.nsw.gov.au">www.nationalparks.nsw.gov.au</a> [Accessed 11/01/22 @3:10pm]</p>  | <p>A phone number – 02 9466 1500 – was available on the Contact Us page of the Q Station’s website.</p> <p>An email address – <a href="mailto:manly@qstation.com.au">manly@qstation.com.au</a> – was available on the Contact Us page of the Q Stations website.</p> <p>The Q Station’s address was also available on the Contact Us page of the website.</p> <p>The Q Station’s phone number was available on the NPWS website.</p>   | Compliant |
| 7                   | <p>The co-proponents shall provide to DIPNR, DEC, NSW Waterways Authority and the Heritage Office the name and a 24-hour contact telephone number of at least one person who will have authority to enter any work areas, to take immediate action to stop works or any activity or take other action as necessary. The appointment of this person does not preclude any public authority from entering the site for the purposes of meeting or enforcing their statutory responsibilities.</p>  | Auditee Interview 03/02/22   | The 24-hour contact for the Q Station is the Mawland Director.   | Compliant |
| 8                   | <p><b>Complaints Register</b></p> <p>The co-proponents shall record details of all complaints received, and actions taken and response times. The Complaints Register shall be made available to: the Environmental Manager at the end of each week; the auditor for the purposes of the comprehensive audit (condition 226); and at other times as requested by relevant NSW Government agencies.</p>   | Complaints Register Current to 2021  | <p><b>Observation</b></p> <p><b>The co-proponents do not share complaints register.</b></p> <p><b>Consideration should be given to sharing complaints register to allow for greater transparency, coordination and management of complaints that may affect the co-proponents.</b></p> <p>In 2021 one complaint was received from a cyclist concerning the entrance boom gate and a request from an indigenous member of the public requesting to fish at Quarantine Beach after sunset when wharf and beach gates are closed for security and penguin protection in accordance with Conditions of Approval and Lease and protocols.</p> <p>In October 2020 many calls were received from the public as to the escaped hazard burn by NPWS on North Head and its impact on the site.</p> <p>Three internal complaints were received during the period 1 July 2018 to 31 December 2019.</p>   | Compliant |
| <b>Commencement</b> |  |  |  |           |
| 9                   | <p><b>Commencement of activity</b></p> <p>The activity is not to commence until:</p> <ol style="list-style-type: none"> <li>the Plan of Management for Sydney Harbour National Park, prepared under the <i>National Parks and Wildlife Act 1974</i>, has been amended to include provisions enabling the adaptive reuse of the Quarantine Station and until other relevant requirements of section 151B of the Act have been met;</li> <li>a relevant lease agreement under the provisions of the National Parks and Wildlife (<i>NPW Act 1974</i>) has been entered into, although the Minister for the Environment, as a co-proponent, shall be at liberty to undertake part or all of the activity prior to the finalisation of a lease;</li> <li>the co-proponents have obtained any necessary approvals from relevant authorities required under any other legislation, including the <i>Heritage Act 1977</i>;</li> <li>the co-proponents provide documentary evidence to the satisfaction of DIPNR that arrangements have been entered into with relevant agencies and/or private firms for a ferry (the Jenner or a similar vessel) to use wharf facilities at Manly; and</li> <li>an emergency and evacuation plan has been prepared for the site by the co-proponents and approved by the DEC (condition 205)</li> </ol> | <p>OEH, Plan of Management, Sydney Harbour National Park, December 2012</p> <p>Lease AC529277C, 13/04/06</p> <p>Lease AC928975B, 26/10/06</p> <p>Wharf Licence, DOC07/27092, 26/10/06</p> <p>Mawland, Visitor Management Plan, March 2005</p> <p>Visitor Access Strategy</p> <p>Security Plan</p> <p>Emergency Evacuation Plan</p> <p><a href="http://www.catalogue.nla.gov.au">www.catalogue.nla.gov.au</a></p> | <p>This requirement occurred prior to the audit period.</p> <ol style="list-style-type: none"> <li>Plan of Management, Sydney Harbour National Park, December 2012. Amendments to the plan were made in 2003.</li> <li>Sighted Lease Agreement AC529277C dated 13 April 2006 for the period 1 December 1999 to 30 November 2050 between Waterways Authority as Lessor and the Minister Administering the <i>National Parks and Wildlife Act 1974</i> as Lessee for the Wharf, described as Lot 10 in Deposited Plan 1081268.</li> <li>Sighted Lease Agreement AC928975B dated 26 October 2006 for the period 26 October 2006 to 25 October 2027 between the Minister for the Environment as Lessor and the Mawland Quarantine Station Pty Ltd (ACN 107 088 157) as Lessee for the following folio identifiers: <ul style="list-style-type: none"> <li>Lot 100 in DP 1075571 (Main Q Station site)</li> <li>Lot 1 in DP 724079 (Q Station Cemetery)</li> <li>Lot 1 in DP 778557 (Section at end of Wharf)</li> </ul> </li> <li>Sighted Wharf Licence between the Minister Administering the National Parks and Wildlife Act 1974 and Mawland Quarantine Station Pty Ltd (ACN 107 088 157) dated 26 October 2006.</li> <li>Information concerning the ferry service was available on the Q Station website including links to the My Fast Ferry timetable. Tickets [when operational] are able to be ordered online. The Auditor considers this requirement to be compliant based on the published timetable. The Jenner sank prior to the audit period.</li> <li>Sighted the Visitor Management Plan dated March 2005 that also included the Visitor Access Strategy, Security Plan and Emergency and Evacuation Plan. The Visitor Management Plan was approved by the Department on 10 August 2005 (p.5).</li> </ol> | Compliant |

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| 10                                   | Notwithstanding condition 9), the co-proponents may undertake the following activities prior to the commencement date:<br>a) commence relevant monitoring programs;<br>b) finalise the various strategies, plans and management systems specified in the EIS, PAS or conditions of approval; and<br>c) operate the existing Quarantine Station facilities up to the current level of usage providing this is undertaken in accordance with condition 24), and subject to conditions 9) e) and 210) being met. This is also subject to any relevant approvals being obtained under the NPW Act  | SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21                               | This requirement occurred prior to the audit period and in accordance with the IAPR, 2020 may be considered Not Triggered; however, the co-proponents were able to provide evidence to demonstrate that the requirement(s) of the CoA had been addressed. On this basis the Q Station was considered to be compliant with the CoA.  | Compliant     |
| 11                                   | For the purpose of the conditions of approval the “commencement date” is taken to be the date that DIPNR declares that all of the requirements of condition 9) have been met and that the activity may commence  | -   | Given the Q Station has been operational for over 15 years it has been assumed that this CoA was satisfied prior to the audit period.   | Compliant     |
| 12                                   | The conditions of this approval shall be incorporated into the lease agreement under the NPW Act for the site.   | Lease AC928975B, 26/10/06 Letter – NPWS to Mawland, Quarantine Station Lease & Planning Modifications - Interpretation Aide, 27/06/18   | Conditions of the approval were observed to be included in Lease AC928975B dated 26 October 2006 for the period 26 October 2006 to 25 October 2027 between the Minister for the Environment as Lessor and the Mawland Quarantine Station Pty Ltd (ACN 107 088 157).<br>A letter from NPWS to Mawland dated 27 June 2018 provided clarity to the co-proponents concerning the lease and any modification(s) to the instrument of approval. | Compliant     |
| <b>Duration of Planning Approval</b> |  |   |   |               |
| 13                                   | This approval is valid for a period of 21 years. Any proposal to extend the approval beyond this period shall comply with the relevant legislative requirements that exist at the time the extension is sought.  | -   | The approval is valid until December 2024.  | Not Triggered |
| 14                                   | An extension to the duration of the planning approval may only be sought if there is a current endorsed conservation management plan for the site  | -   | The approval is valid until December 2024.  | Not Triggered |
| 15                                   | In addition to any specific legislative requirements that may exist at the time an extension to the approval is sought, the application shall be made available for public comment and address:<br><ul style="list-style-type: none"> <li>the provisions of any relevant endorsed conservation management plans;</li> <li>compliance with the terms of this activity approval and any approved modifications;</li> <li>the outcomes of all monitoring undertaken since commencement of the activity, including the success of any adaptive management measures applied; and</li> <li>the status of any integrated planning undertaken for North Head, including the role of the site in any such process.</li> </ul> This condition shall not fetter the exercise of any statutory power or discretion of any authority with respect to any proposed extension of the duration of planning approval. | -   | The approval is valid until December 2024.  | Not Triggered |
| <b>Scope of Approval</b>             |  |   |   |               |
| 16                                   | <b>Other infrastructure approvals</b><br>With the exception of minor maintenance repairs or works (as defined) or works in accordance with condition 38) c), prior to undertaking any works associated with the provision of water and sewer services to the site the co-proponents shall consult Sydney Water and obtain a Section 73 Certificate under the <i>Sydney Water Act 1994</i> .  | Auditee Interview 03/02/22<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21 | No works were undertaken during the audit period that required the provision of water and sewer services to the Q Station.  | Not Triggered |



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| 17 | <p><b>Aspects of the activity not approved</b></p> <p>Aspects of the activity that are not approved as part of this application are listed in Schedule 2.</p>  | <p>Auditee Interview 03/02/22</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p>   | <p>No works stated in Schedule 2 were undertaken during the audit period.</p>  | Compliant |
| 18 | <p><b>Aspects of the activity approved subject to modification or detailed design</b></p> <p>Aspects of the proposal that are approved, subject to modifications or further detailed design, are listed in Schedule 3. The outcomes and objectives to be achieved, and the criteria for assessment of the achievement of the outcome or objective, are also detailed in Schedule 3.</p>  | <p>MP08_0041 MOD 03, 25/05/18</p>  | <p>Refer to Schedule 3 of this table.</p>  | Compliant |
| 19 | <p><b>Adaptation of accommodation facilities</b></p> <p>Prior to the commencement of any works associated with the conversion of rooms in any of the accommodation buildings, a sample adaptation within Building P6 must be completed and endorsed by the Heritage Council and DEC. The sample adaptation is to include accommodation room fitout and furnishings.</p>  | -  | <p><i>This requirement occurred prior to the audit period and in accordance with the IAPR, 2020 may be considered Not Triggered; however, the co-proponents were able to provide evidence to demonstrate that the requirement(s) of the CoA had been addressed. On this basis the Q Station was considered to be compliant with the CoA</i></p>  | Compliant |
| 20 | <p>Adaptation of buildings within the First and Second Class Precincts may occur in accordance with specifications in Table B-2 of the PAS. Adaptation works are to be assessed and approved in accordance with terms 35) – 40), and reflecting the outcomes of the P6 prototype adaptation.</p>   | <p>Manidis Roberts, North Head Quarantine Station Preferred Activity Statement, September 2002</p> <p>Site Inspection</p>  | <p>The P6 prototype adaptation concerned site paint colour. Paint colours were observed to be in keeping with the PAS.</p>   | Compliant |
| 21 | <p>Buildings P1, P2 and the original rooms that are adapted, at the conclusion of the lease, are to be returned to their condition and spatial layout/internal configuration as at the commencement date of the lease. Other permissible alterations include those works that are identified in terms 31 and 38. At all times interpretation of the original spatial layout and internal configuration is to be exhibited prominently near buildings P1 and P2.</p>  | <p>Site Inspection</p>   | <p>The original spatial layout and internal configuration was observed to be exhibited near buildings P1 and P2.</p>   | Compliant |
| 22 | <p><b>Reconstructions</b></p> <p><u>Buildings P21 &amp; P23</u></p> <p>The proposed reconstruction of P21 and P23 and use for environmental and cultural study purposes is approved, subject to:</p> <ol style="list-style-type: none"> <li>all existing buildings associated with the Environmental and Cultural Study Centre being made operational first;</li> <li>information demonstrating a clear need for the reconstruction based on the management requirements for the ongoing operation of the site (including demonstrated market demand for additional student accommodation) being provided to the satisfaction of the Heritage Council and DEC;</li> <li>final plans for reconstruction being submitted to and approved by the Heritage Council in accordance with the requirements of the <i>Heritage Act 1977</i>. These plans must incorporate distinctions in design between the two buildings; and</li> <li>compliance with the certification requirements of the NPWS Construction Assessment and Approvals Procedure.</li> </ol> | <p>Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019</p> <p>Crown Completion Certificate P217_186-2, 18/07/19</p> <p>Letter – Form to OEH, Former Quarantine Station Reconstruction of P21 and P23 Buildings, 01/08/19</p> <p>Heritage Council to Form, Compliance With Consent Conditions S60 Approval Under The Heritage Act 1977, 14/08/19</p> | <p>Reconstruction of Building P21 and P23 occurred between February 2018 and May 2019.</p> <p>Sighted a photographic log book for Buildings P21 and P23, dated August 2019 that had been issued for an occupation certificate. The log book included a Crown Completion Certificate (Appendix B) and Completed Works Certificate (Appendix C). The log book states that <i>“the documentation and construction has been carried out in accordance with:</i></p> <ol style="list-style-type: none"> <li><i>the overarching Condition of Planning Approval for the conservation and adaptive reuse of the former North Head Quarantine Station issued pursuant to the Heritage Act 1977;</i></li> <li><i>The relevant site wide management plans;</i></li> <li><i>Drawing nos. A01 – A25 prepared by Paul Davies, 10 October 2016;</i></li> <li><i>Amendments to Approved Buildings P21 and P23 Heritage Impact Statement, prepared by Paul Davies, 6 September 2016;</i></li> <li><i>Research Design and Archaeological Excavation Methodology Report, prepared by Austral Archaeology, November 2016”.</i></li> </ol> <p>A completion of works cover letter from Form Architect to OEH dated 1 August 2019 provided the same confirmation as the log book.</p> <p>Sighted a letter from Heritage Council to Form confirming satisfaction with Conditions 2 - 17 of the Heritage Council's approval for application No. 2011/S60/85, approved on 26 March 2012.</p> | Compliant |

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| 23 | <p><u>Buildings H1 and P22</u><br/>Reconstruction and use of buildings H1 and P22 is approved, subject to:</p> <ul style="list-style-type: none"> <li>a) final plans for reconstruction being submitted to and approved by the Heritage Council in accordance with the requirements of the <i>Heritage Act 1977</i>;</li> <li>b) compliance with the certification requirements of the NPWS Construction Assessment and Approvals Procedure; and</li> <li>c) if, after reconstruction commences or is completed, further alterations to the buildings are proposed, these shall require assessment and approvals under the relevant legislation</li> </ul> | <p>Delegated Decision for Director's Signature, Building H1 and Building P22, 2005/S60/193, 31/03/06<br/>North Head Quarantine Station Section 60 Application Reconstruction of Buildings H1 and P22 (1883 Hospital Building and 1883 Accommodation Building), November 2005</p> | <p>Reconstruction of H1 and P22 was completed prior to the audit period.<br/>Sighted North Head Quarantine Station Section 60 Application Reconstruction of Buildings H1 and P22, dated November 2005 and Delegated Decision for Director's Signature for Buildings H1 and P22 dated 31 March 2006.</p>  | Compliant     |
| 24 | <p><b>Restrictions on use</b><br/>Use of the site and the undertaking of the activity must proceed in accordance with uses permissible under the <i>NPW Act 1974</i> (as amended).</p>   | <p>Site Inspection<br/>Complaints Register Current to 2021</p>   | <p>During the site inspection it was observed that the use of the site and the undertaking of the activity was being conducted in accordance with uses permissible under the <i>NPW Act 1974</i>.</p>  | Compliant     |
| 25 | <p>Buildings in the Third Class/Asiatic Precinct shall be used only for accommodation, interpretation and education purposes as specified in the PAS. Building P27 may also be used for special events, functions and/or conferences but only as a secondary use to education and interpretation</p>   | <p>Site Inspection</p>   | <p>Buildings in the Third Class / Asiatic Precinct were observed to be only being used for the approved purposes. Building P27 is used for additional functions as required.</p>   | Compliant     |
| 26 | <p>Regular public tours of the site must form a component of the operation of the Quarantine Station and be run during publicly accessible periods, including weekends and public holidays.</p>  | <p><a href="http://www.qstation.com.au">www.qstation.com.au</a> [Accessed 12/01/22 @08:10am]</p>   | <p>Public tours can be booked via the website or in person at the Visitor Centre. Any issues with booking tours can be raised via email to <a href="mailto:tourdesk@qstation.com.au">tourdesk@qstation.com.au</a>.<br/>In addition to Educational Tour Programmes, the following tours were available to be booked at the time of the audit: Ghostly Encounters / Ghost Trackers / Paranormal Investigation / Scream Night Out / Quarantine Wander / Wildlife Meanders Tour.<br/>Due to the COVID-19 pandemic in 2020 and 2021 there were some disruptions to the public tour schedule.</p>  | Compliant     |
| 27 | <p>Timber buildings shall not be used for the storage of fuel or other flammable materials.</p>  | <p>Site Inspection 03/02/22</p>  | <p><b>Non-compliant</b><br/><b>Incompatible Class 3 (flammable) and Class 8 (corrosive) products were observed to be stored together and without secondary containment in the timber Maintenance / Glasshouse Building (A24) end room. Two gas canisters were also observed to be stored in the building. A fire extinguisher was not located in the end room where the flammable packages were stored.</b><br/><b>Evidence of the reorganized packages was provided to the Auditor on 10 February 2022; however, they remained in the timber building. Evidence a fire extinguisher had been placed into the end room was also provided to the Auditor. Refer to Appendix F.</b><br/><b>Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that all flammable chemicals had been removed from building A24.</b><br/><b>Observation</b><br/><b>Flammable goods cabinets in Building CP5 Maintenance Shed and A23 (Linen Store) were observed to be unlabelled.</b><br/><b>Evidence the flammable cabinets had been labelled was provided to the Auditor on 10 February 2022. Refer to Appendix F.</b><br/><b>Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that all flammable chemicals had been removed from building A24.</b></p> | Non-compliant |

| Integrated Planning                             |   |   |   |               |
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| 28  | The co-proponents shall contribute to any future initiatives focused on the development of an integrated planning approach for North Head, or components thereof, such as transport, infrastructure and utilities, accommodation and/or visitor access. Opportunities for providing general water access to North Head via Quarantine wharf shall be considered in developing such an approach, with a focus on the potential impacts of such access on the values of the Quarantine Station and implications for visitor management  | Auditee Interview 03/02/22<br><a href="http://www.landcare.nsw.gov.au">www.landcare.nsw.gov.au</a><br>North Head Stakeholder Group Meeting Minutes – 18/08/21, 17/03/21, 02/12/20, 01/07/20, 11/03/20, 18/12/19, 18/09/19, 01/05/19, 20/02/19, 10/07/18   | Mawland management reported that the ferry stopped in March 2020 due to the COVID-19 pandemic. The ferry, when operating, provides access to the Q Station. Persons arriving on the ferry can use QStation shuttle bus to North Head Scenic Drive roundabout where public bus stop is located.<br><br>Mawland management reported that there have been talks in the past to turn the Wharf into public wharf but this did not progress during the audit period.<br><br>The co-proponents participate in North Head Stakeholder Group which meets regularly. The minutes for a meeting held on 18 August 2021 noted that the issue of buses using the Q Station car park (CP1) despite not visiting the Q Station was discussed and that this was a whole of headland issue.<br><br>Apart from the additional piles adjacent to the Wharf to accommodate the ferry service for the Invictus Games ferry arrival in 2018 no work on or associated at the Wharf was conducted during the audit period.<br><br>The Q Station is a partner of the North Head Sanctuary Foundation a community based not-for-profit dedicated to preserving North Head as a protected environment for its natural attributes. | Compliant     |
| 29  | In order to minimise the requirement for on-site parking, the co-proponents shall undertake consultations with other land managers at North Head regarding options for off-site car parking. The outcome of these discussions shall be reported on an annual basis as part of the annual environmental report (Condition 221).  | Auditee Interview 03/02/22  | Mawland management reported that there has been no off-site car parking since 2018.   | Not Triggered |
| 30  | The co-proponents shall undertake discussions with the Sydney Harbour Federation Trust or future land manager regarding a cooperative and integrated approach to the future management and interpretation of the 3rd Cemetery.  | Sydney Harbour Trust Federation, Management Plan North Head Sanctuary, 2011<br>OEH, Plan of Management, Sydney Harbour National Park, 2012<br><br>GML Heritage, Third Quarantine, North Head Sanctuary Interpretation Strategy, 03/10/17<br><a href="http://www.harbourtrust.gov.au">www.harbourtrust.gov.au</a><br>North Head Stakeholder Group Meeting Minutes – 22/08/17 | The 3 <sup>rd</sup> Cemetery is managed in accordance with the North Head Sanctuary Management Plan.<br><br>The Third Quarantine Station Interpretation Strategy was commissioned by the Sydney Harbour Federation Trust.<br><br>Issues concerning North Head are discussed as part of the North Head Stakeholders Group in which the co-proponents participate.<br><br>The Plan of Management (2012) includes map of proposed/existing tracks and linkages across the North Head peninsula. Plans to connect the 3 <sup>rd</sup> Cemetery to the Q Station via a track have been placed on hold to address other North Head priorities.  | Compliant     |
| Staging, Certification and Undertaking of Works |   |   |   |               |
| 31  | <b>Staging of works</b><br>The undertaking of works as part of the activity shall generally occur in accordance with the staging plan specified in Table F-1 of the PAS, subject to the following modifications:<br>a) references to the “DACMP” shall be deleted and replaced with “Conservation Works Program (condition 78)”;<br>b) references to “QSARG” shall be deleted;<br>c) 50%31 of the Conservation Works Program medium term works shall be completed by the end of stage 2;<br>d) upgrade of the fire hydrant system shall be completed within 5 years of the commencement date in accordance with condition 211);<br>e) revisions to building and conservation works as follows:<br>• adaptation of P12 shall occur in Stage 2<br>• adaptation of P10 shall occur in Stage 3<br>• an approach to sampling and adaptation of the bathrooms in P14-16 shall be prepared during Stage 1 (refer Schedule 3); and<br>f) amend the staging plan so that two free public open days are to be held in every twelve-month period, in accordance with condition 126). | Manidis Roberts, North Head Quarantine Station Preferred Activity Statement, September 2002   | No works were stage during the audit period.<br><br>Table F-1 of the PAS notes there were five stages over a period of 40 months of from the date of approval/commencement.   | Not Triggered |



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| 32 | The co-proponents shall not commence works associated with Stage 2 of the staging plan until the works and project planning actions specified in Stage 1 have been substantially completed to the satisfaction of the DEC and the Heritage Council.  | Manidis Roberts, North Head Quarantine Station Preferred Activity Statement, September 2002   | Table F-1 of the PAS notes there were five stages over a period of 40 months of from the date of approval. Stages 1 and 2 were to occur within a period of 18 months from the date of approval/commencement.  | Not Triggered |
| 33 | The co-proponents shall not commence works associated with Stage 3 of the staging plan until the first comprehensive audit has been completed (condition 228) and any requirements or directions issued by the DEC, DIPNR or the Minister for Infrastructure, Planning and Natural Resources under conditions 232) and 233) have been complied with.   | Manidis Roberts, North Head Quarantine Station Preferred Activity Statement, September 2002   | The first comprehensive environmental audit was undertaken during the construction phase of the project in April 2007 by GHD Pty Ltd.   | Not Triggered |
| 34 | The co-proponents shall not commence works associated with Stage 4 of the staging plan until the DEC and the Heritage Council are satisfied that a significant proportion of the remaining Conservation Works Program (condition 78)) medium term works have been completed during Stage 3. Compliance with this condition shall be determined as follows:<br>a) if Stage 4 is not scheduled to commence within 3 years of the commencement date, then 100% of all medium term works must be completed before Stage 4 works may proceed; or<br>b) if Stage 4 is scheduled to commence within 3 years of the commencement date, then at least 75% <sup>32</sup> of the total medium term works must be completed before Stage 4 works may proceed.<br><sup>32</sup> based on 75% of the number of medium term work items listed in the Conservation Works Program.                      | Manidis Roberts, North Head Quarantine Station Preferred Activity Statement, September 2002   | Table F-1 of the PAS notes there were five stages over a period of 40 months of from the date of approval. Stage 4 was to occur within 25 – 30 months from the date of approval/commencement.   | Not Triggered |
| 35 | <b>General Works</b><br>The co-proponents shall comply 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.<br>All relevant construction works includes:<br>a) all works that require the disturbance or alteration of fabric, buildings and other structures;<br>b) installation or upgrading of utility infrastructure and any maintenance or upgrade work that requires the excavation of new lines or locations or involves the discharge of polluting substances (as defined); and<br>c) landscape works in accordance with the adopted Heritage Landscape Management Plan that require ground surface disturbance, or the installation of new landscape elements including car park construction and road works. | OEH, Construction Assessment Procedures, Certification for new building and infrastructure works within lands reserved or acquired under the National Parks and Wildlife Act 1974, November 2011<br><a href="http://www.environment.nsw.gov.au">www.environment.nsw.gov.au</a><br>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br><i>Heritage Landscape Masterplan<br/> Inscriptions Conservation<br/> Management Plan</i><br>Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019<br>Crown Completion Certificate P217_186-2, 18/07/19<br>Letter – Form to OEH, Former Quarantine Station Reconstruction of P21 and P23 Buildings, 01/08/19 | Reconstruction of Building P21 and P23 occurred between February 2018 and May 2019.<br>Sighted a photographic log book for Buildings P21 and P23, dated August 2019 that had been issued for an occupation certificate. The log book included a Crown Completion Certificate  | Compliant     |
| 36 | Any application for construction work within the Quarantine Station site must be submitted to the Heritage Advisor for review prior to lodgement with the DEC and Heritage Council. This requirement can be waived at the discretion of the Heritage Advisor, except for those works specified in the conditions of approval as requiring approval from the Heritage Council.  | Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019<br>North Head Quarantine Station Section 60 Application Reconstruction of Buildings H1 and P22 (1883 Hospital Building and 1883 Accommodation Building), November 2005   | Sighted North Head Quarantine Station Section 60 Application for Reconstruction of Buildings H1 and P22, dated November 2005 and the Delegated Decision for Director's Signature for Buildings H1 and P22 dated 31 March 2006 which was approved by the Heritage Council. Works were conducted in 2018 and 2019.<br>The log book for P21 and P23 notes that Section 60 consent 2011/S60/85 and subsequently, S65A/2016/41 applications dated 21 December 2016 were completed by the Heritage Advisor works were conducted in 2018 and 2019. | Compliant     |

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| 37 | <p>The co-proponents must submit as part of any application for construction works the following additional information (where it is relevant to the particular proposal) to that required under the NPWS Construction Assessment and Approvals Procedure:</p> <ol style="list-style-type: none"> <li>a statement of compliance with the relevant policies of the QSCMP, DACMP, relevant site-wide plans and/or requirements of the conditions of this approval, or clear justification for any proposed variances;</li> <li>details of all materials, fittings, fixtures and other specifications;</li> <li>details of proposed construction techniques;</li> <li>sample boards and coloured elevations showing proposed materials and colours, based on research into historic colour schemes as required;</li> <li>a schedule of fabric and other materials to be sampled consistent with the fabric sampling guidelines [condition 86) and sampling provisions for asbestos and rainwater systems (condition 111) and bathroom fixtures [condition 99) b)];</li> <li>for carparks: <ul style="list-style-type: none"> <li>details of the stormwater management system based on the guideline “Managing Urban Stormwater – Soils and Construction” (DoH 1998)</li> <li>an assessment of the soil and hydrological characteristics downslope of the proposed carparks</li> <li>the proposed maintenance program for structures associated with the carpark (eg: stormwater cells;</li> </ul> </li> <li>historical archaeological assessment to comply with the requirements of the North Head Quarantine Station Archaeological Management Plan (2000);</li> <li>an outline of environmental and/or heritage impacts and proposed mitigative measures or safeguards, including procedures for avoiding impacts on flora and fauna; and</li> <li>proposed monitoring and maintenance procedures, where relevant.</li> </ol> | Auditee Interview 03/02/22   | The co-proponents reported that there were no applications for construction works during the audit period. Application for P21 and P23 occurred prior to the audit period.  | Not Triggered |
| 38 | <p>Notwithstanding the above, approvals in accordance with the NPWS Construction Assessment and Approvals Procedure are not required for the following matters, where these are undertaken in accordance with the provisions of the <b>Conservation Works Program</b> or relevant site-wide plan(s):</p> <ol style="list-style-type: none"> <li>painting and carpeting;</li> <li>basic essential services, such as upgrading of electrical wiring, installation of power points, telephone connections, etc;</li> <li>infrastructure works which involve the essential repair or replacement of existing facilities in the same location using “like-for-like” technology, or where this is not available, appropriate contemporary technology;</li> <li>the provision of external lighting, signage and waste receptacles; and</li> <li>minor maintenance repairs or works (as defined).</li> </ol>   | Auditee Interview 03/02/22<br>Form, Building H4 Doctors & Nurses Quarters Impact of Minor Works and Alterations, 01/08/19  | <p>Mawland management reported that during the audit period works were essentially repair and maintenance activities.</p> <p>Where approvals are not required works are conducted in accordance with the CWP.</p> <p>A maintenance log is maintained by the operations team.</p> <p>Sighted report by Form Architects documenting minor works to Building H4.</p> | Compliant     |
| 39 | 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.  | Auditee Interview 03/02/22   | The co-proponents reported that the Environmental Manager is located in Building S7 and is aware when construction activities are occurring on-site.  | Compliant     |
| 40 | <p><b>NSW Heritage Council Approvals</b></p> <p>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.</p>  | Auditee Interview 03/02/22   | No approvals were occurred in the audit period. Construction works undertaken during the audit period were approved by the Heritage Council prior to the audit period.  | Not Triggered |
| 41 | <p><b>Wharf</b></p> <p>If necessary, a separate application and approval under Part 5 of the <i>EP&amp;A Act 1979</i> and other relevant legislation will be required for:</p> <ol style="list-style-type: none"> <li>upgrade works to the wharf, including any works that require excavation or disturbance of the seabed. This excludes use by the proposed ferry service, lighting, works identified in the PAS and minor maintenance repairs or works (as defined) that do not impact on the seabed and; and/or</li> <li>provision of additional ferry services or watercraft access to the Quarantine Station</li> </ol>  | Review of Environmental Factors Determination Report, 18/0019<br>Email Communication – Mawland & OEH, HPE CM: RE: Q Station Fender Pile Installation REF - Draft Determination report and notice, 20/09/2018 to 05/10/18 | Sighted a Review of Environmental Factors (REF) Determination Report for the installation of protective fender piles at the Wharf. Emails noted that the two piles were to be attached adjacent to the Wharf, not to the Wharf. The REF was received by OEH on 28 September 2018.   | Compliant     |

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| 42 | <p>Prior to commencement of any work on or associated with the Quarantine Station wharf, or the commencement of the ferry service at the wharf, the co-proponents shall lodge an Application for Construction of Waterside Structures to the Waterways Authority for approval. This application must be submitted to the Heritage Advisor for endorsement prior to lodgement with the Waterways Authority.</p> <p>The application shall be accompanied by the information<sup>33</sup> and comply with the requirements specified in Schedule 4.</p> <p>Prior to determining the application, the Waterways Authority shall consult with NSW Fisheries<sup>34</sup></p> <p><sup>33</sup> The Waterways Authority reserves the right to require further details, verifying calculations etc. following submission and examination of the information outlined in Schedule 4.</p> <p><sup>34</sup> Incorporates a condition of concurrence, as granted under the Fisheries Management Act 1994.</p> | <p>Site Inspection<br/>Auditee Interview 03/02/22<br/>Letter – NPWS to RMS, Certificate of Completion – Installed Fender Piles Q Station Wharf, 21/06/19<br/>Email – Tonkin to Mawland, Wharf Capacity Estimate &amp; Repairs, 22/07/19 @14:09hrs</p> <p>An email from Tonkin to Mawland dated 22 July 2019 provided details concerning a review of the condition of the Wharf and estimated capacity of the walkway. The email included markup drawings/scope of work to replace termite damage to joists and desking planks and replace rusted bolts to reinstate the capacity of the Wharf. In their response to the scope of work for the comprehensive audit TfNSW were concerned about condition and maintenance of the Wharf. In particular, that some planks and sleepers needed replacing, the main area of the Wharf was unable to be used and that repairs to the surface have not progressed. Negotiations between the co-proponents is ongoing concerning infrastructure renewal and replacement.</p> <p>Apart from the additional piles adjacent to the Wharf to accommodate the ferry service for the Invictus Games ferry arrival in 2018 no work on or associated at the Wharf was conducted during the audit period. Sighted a Certificate of Completion from NPWS to RMS for the installation of fender piles (two) dated 21 June 2019.</p> | <p><b>Observation</b><br/><b>One rotted sleeper and a number of other partially decayed sleepers were observed on the Wharf during the site inspection. Temporary wooden sheeting had been placed along one side to manage access, and to avoid trips and falls.</b><br/><b>Repair work to the Wharf should be conducted in consultation with TfNSW.</b></p>   | Compliant     |
| 43 | <p><b>Access to Store Beach</b><br/>A separate application and approval under Part 5 of the <i>EP&amp;A Act 1979</i>, and other relevant legislation, will be required for the provision of independent access to Store Beach, or any works associated with the upgrading of the existing access track or construction of any new tracks to Store Beach</p>   | <p>Site Inspection<br/>Auditee Interview 03/02/22</p>  | <p>No work on or associated with access to Store Beach was conducted during the audit period.</p>  | Not Triggered |
| 44 | <p><b>Operating Certificate</b><br/>The co-proponents shall apply to the DEC for an Operating Certificate (as defined), prior to the commencement of operation of the following facilities:</p> <ol style="list-style-type: none"> <li>therapeutic health facility (P5);</li> <li>educational facilities;</li> <li>restaurant, food service and beverage facilities;</li> <li>accommodation facilities; and</li> <li>the ferry service</li> </ol>   | <p>Letter NPWS to Mawland, 10/12/19 (Operating Certificate for P21 and P23)<br/>Completion Certificate Application, Mawland to NPWS, 30/07/19</p>  | <p>The only commencement of operations during the audit period was associated with the reconstruction of buildings P21 and P23. These are used as for accommodation (i.e.: beds) for educational groups when they attend the site. An Operating Certificate was granted by NPWS prior to commencement of operations.</p> <p>All other facilities operations commenced prior to the current audit period.</p> | Compliant     |

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| 45 | <p><b>Archival Recording</b></p> <p>Archival recording shall be carried out at two stages:</p> <p>a) <b>prior to any adaptation work commencing on a building, historic item (including infrastructure) or cultural landscape element</b> - the archival recording shall be submitted to and endorsed by the Heritage Advisor prior to works commencing. This shall form part of the application for construction works where applicable; and</p> <p>b) <b>on completion of adaptation works</b> - the archival recording shall be submitted to the Heritage Advisor for endorsement. This shall form part of the application for a Compliance Certificate in accordance with the NPWS Construction Assessment and Approvals Procedure where applicable. Archival recording will also be required during the removal of any fabric on site that exposes significant fabric/detail.</p> | SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21  | The only adaptation works to occur to during the audit period were to Buildings P21 and P23.<br>SNC Lavalin note that the Heritage Council endorsed the prior to adaptation full site Archival Recording on 27 July 2006.   | Compliant |
| 46 | <p>The form of archival recording required is:</p> <p>a) <b>archival record prior to commencement of adaptation works</b> - the archival record shall meet the minimum standards for recording outlined in the Archaeological Management Plan. It shall include measured drawings of all buildings and structures and photographic recording; and</p> <p>b) <b>archival record for completed adaptation works</b> – the archival record shall comprise “as-built” drawings of all buildings and structures that have been the subject of adaptation works indicating the location and detail of changes.</p>   | Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019  | Form Architects prepared a log book detailing the reconstruction of Buildings P21 and P23 during the audit period.  | Compliant |
| 47 | Measured drawings shall be prepared in accordance with the NSW Heritage Office guidelines ‘How to prepare archival records of heritage items’.   | Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019  | Form Architects prepared a log book detailing the reconstruction of Buildings P21 and P23 during the audit period.  | Compliant |
| 48 | Photographic records shall be prepared in accordance with the NSW Heritage Office ‘Guidelines for photographic recording of heritage sites, buildings, structures and movable items’.  | Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019  | Form Architects prepared a log book detailing the reconstruction of Buildings P21 and P23 during the audit period.  | Compliant |
| 49 | A copy of the archival record shall be lodged with DEC and the NSW Heritage Office   | Email – Form to Heritage, Quarantine Station, Manly - Buildings P21, P23 & H4, 01/08/19 @17:02hrs   | Buildings P21 and P23 archival recording was prepared by Form Architects (August 2019) and issued to OEH on 1 August 2019. Sighted email from Form to Heritage dated 1 August 2019.   | Compliant |
| 50 | <p><b>Emergency Works</b></p> <p>Notwithstanding any other conditions of this approval, in the event that emergency works are required to be undertaken, the co-proponents shall take all reasonable steps to ensure that these occur as expeditiously as possible. Emergency works are works of a temporary and reversible nature which are urgently required to arrest an imminent threat to life, safety, public liability, and/or threat to the fabric or property</p>   | <p>Auditee Interview 03/02/22</p> <p>Site Inspection</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p>Emergency works within the reporting period included removal of a Coral Tree within Peace Park that had fallen down during a storm. Removal of the tree occurred in early December 2019.</p> <p>The stump of the Coral Tree was observed during the site inspection.</p> | Compliant |
| 51 | Where the co-proponents consider it is necessary to undertake emergency works, notification shall be given to the Heritage Council and the NPWS as soon as possible and direction sought on further procedures to be implemented.  | SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21   | Mawland notified NPWS on 11 December 2019 of the requirement to remove the Coral Tree due to safety concerns.   | Compliant |



| Environmental Manager |   |   |   |               |
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| 52                    | <p>Prior to the commencement of construction works the co-proponents shall appoint a suitably qualified Environmental Manager (EM). The appointment of the EM shall be subject to the approval of the DEC and DIPNR. The co-proponents shall provide to the DEC and DIPNR the following information:</p> <ol style="list-style-type: none"> <li>the qualifications and experience of the EM;</li> <li>the roles and responsibilities of the EM; and</li> <li>the authority and independence of the EM.</li> </ol> <p>An EM shall be engaged for the duration of the approval.</p>   | <p>Auditee Interview 03/02/22<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/>NPWS list of Environmental Managers, provided 13/05/22</p>                                      | <p>During the audit period there were four Environmental Managers.</p> <ul style="list-style-type: none"> <li>Jennifer Roberts (January 2018 – May 2019), Environmental Manager, NPWS</li> <li>Robyn San (May 2019 – August 2019), Environmental Manager, NPWS</li> <li>Jessica Dargan (August – December 2019), Environmental Manager, NPWS</li> <li>Rebecca Yit (October 2021 - March 2022) Environmental Manager, NPWS.</li> </ul> <p><b>No evidence was available to demonstrate that the Department had approved all of the Environmental Managers that held the position during the audit period.</b></p> | Non-compliant |
| 53                    | <p>The EM shall:</p> <ol style="list-style-type: none"> <li>undertake the specific actions identified in the conditions of approval;</li> <li>oversee the undertaking of the activity in accordance with the conditions of approval;</li> <li>contribute to the development, and oversee the implementation of, the EMP and the associated integrated monitoring and adaptive management system as it relates to environmental management;</li> <li>facilitate an environmental management module as part of an induction and training program for all persons involved with the construction works;</li> <li>for the first five years from the commencement date, provide six monthly (or as required) status reports to the DEC which shall include, but not be limited to: <ul style="list-style-type: none"> <li>progress in implementation of approval conditions as these relate to environmental management (this shall include monitoring programs)</li> <li>complaints and responses to these</li> <li>any breaches of conditions and response</li> <li>compliance or other issues arising;</li> </ul> </li> <li>have the authority to stop work immediately if, in the view of the EM, 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;</li> <li>be available during construction activities at the site and be present on-site during any critical construction activities as defined in the EMP; and</li> <li>immediately advise the co-proponents, DEC, DIPNR, 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.</li> </ol> | <p>Auditee Interview 03/02/22</p>   | <p>The Environment Manager oversaw works during the audit period as required.</p> <p>There was no requirement to stop works for any unacceptable impacts during the reporting period.</p> <p>There was no requirement to stop works for any unacceptable impacts during the reporting period.</p> <p>Six monthly status reports were not required during the audit period as this requirement pre-dated the audit period.</p>   | Compliant     |
| Heritage Adviser      |   |   |   |               |
| 54                    | <p>Prior to the intended commencement of construction works the co-proponents shall appoint a suitably qualified Heritage Adviser. The appointment of the Heritage Adviser shall be subject to the approval of the DEC and the Heritage Council. The co-proponents shall provide to the DEC and the Heritage Council the following information prior to any appointment being made:</p> <ol style="list-style-type: none"> <li>the qualifications and experience of the Heritage Adviser;</li> <li>the roles and responsibilities of the Heritage Adviser;</li> <li>the authority and independence of the Heritage Adviser.</li> </ol> <p>The appointment of the Heritage Adviser shall be for a period agreed to by the Heritage Council and DEC. The Heritage Council and the DEC shall review the functioning of the Heritage Adviser upon receipt of the six monthly status reports [condition 55) d)].</p>   | <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> | <p>Form Architects (Aust) Pty Ltd (ABN 63 446 075 267) were the approved Heritage Adviser for the Q Station for the audit period.</p> <p>The 2018-2019 and 2020 Annual Environmental Reports note that the Heritage Adviser was approved on 12 December 2017.</p>   | Compliant     |

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| 55                            | <p>The Heritage Advisor shall:</p> <ol style="list-style-type: none"> <li>assess applications for construction works with respect to heritage matters and provide advice to the NSW Heritage Council (condition 40) and DEC. This shall include, but not be limited to, ensuring that all plans and specifications submitted with applications for construction works are prepared in accordance with: <ul style="list-style-type: none"> <li>the conditions of approval</li> <li>the requirements of any relevant site-wide plans and Precinct Plans</li> <li>the QSCMP and DACMP, where applicable. The Heritage Advisor shall also have responsibility for approving such applications, if the NSW Heritage Council delegates this function.</li> </ul> </li> <li>review all site-wide plans prior to lodgement with the relevant approval body to ensure that these are generally in accordance with the QSCMP and DACMP;</li> <li>undertake regular inspections of works in progress and, where appropriate or as specified by the DACMP, either directly supervise works or require the co-proponents to appoint a suitably qualified person to supervise works;</li> <li>for the first three years from the commencement date, provide status reports to the Heritage Council and DEC every six months or as required which shall include, but not be limited to: <ul style="list-style-type: none"> <li>the next 3-6 months schedule of works</li> <li>compliance or other issues arising; and</li> </ul> </li> <li>have the authority to stop work immediately if, in the view of the Heritage Adviser, an unacceptable impact is likely to occur, or to require other reasonable steps to be taken to avoid or minimise any adverse impacts with respect to those matters for which a construction application is required or where maintenance work is being conducted.</li> </ol> | <p>Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019<br/>Auditee Interview 03/02/22</p>   | <p>The Heritage Adviser assessed, supervised and participated in reconstruction works, where required, during the audit period. The log book included numerous photographs of the reconstruction stages of P21 and P23.</p> <p>Six monthly status reports were not required during the audit period as this requirement pre-dated the audit period.</p> <p>No works were required to be stopped during the audit period.</p>  | Compliant |
| <b>Community Consultation</b> |   |  |   |           |
| 56                            | <p><b>Quarantine Station Community Committee</b></p> <p>Within three months from the commencement date the co-proponents shall establish a Quarantine Station Community Committee (QSCC). The QSCC may be established as a subcommittee of the NPWS Sydney Region Advisory Committee or as a full Advisory Committee under the <i>NPW Act</i>, or some other suitable arrangement approved by the DEC. The QSCC shall report to the DEC</p>   | <p><a href="http://www.environment.nsw.gov.au/QuarantineStationCCC">www.environment.nsw.gov.au/Quarantine Station CCC</a></p> <p>Approval to Reconstitute the Sydney Harbour National Park Quarantine Station Community Committee, 14/11/18</p>                                | <p>The QSCCC was active at the time of the audit.</p> <p>Sighted the Approval to Reconstitute the Sydney Harbour National Park Quarantine Station Community Consultative Committee dated 14 November 2018.</p>  | Compliant |
| 57                            | <p>The QSCC shall be chaired by an independent chairperson approved by the DEC and DIPNR and comprise representatives with relevant expertise and experience from appropriate community interest groups, Aboriginal communities and local government. Representatives from relevant government agencies or other individuals may be invited to attend meetings by the Chairperson.</p>  | <p><a href="http://www.environment.nsw.gov.au/QuarantineStationCCC">www.environment.nsw.gov.au/Quarantine Station CCC</a></p> <p>DPIE, Expressions of Interest for QSCCC, 27/04/21</p> <p>Letters – DPIE, Notification of Appointment to the North Head QSCCC, 04/04/19 x6</p> | <p>The Advisory Committees section of the Department's website listed the names of the QSCCC. The chairperson is stated in the minutes of the meetings.</p> <p>The co-proponents reported that there is a four year membership of the QSCCC.</p> <p>Sighted an Expression of Interest for the QSCCC dated 27 April 2021 for two vacant positions as well as the members of the committee. It is not clear whether this was made publicly available.</p> <p>Sighted six letters dated 4 April 2019 confirming the appointment of six representatives to the QSCCC.</p>   | Compliant |
| 58                            | <p>The general functions of the QSCC shall include:</p> <ol style="list-style-type: none"> <li>provide comment and recommendations to the co-proponents on proposals or relevant matters including the development and implementation of site-wide plans (as defined), the integrated monitoring program, annual environmental reports, comprehensive audit reports and compliance with the conditions of this approval; and</li> <li>provide a communication channel between the community, the co-proponents and the determining and approval authorities on matters relating to the Quarantine Station.</li> </ol> <p>The conditions of approval also include other specific functions of the QSCC.</p>  | <p><a href="http://www.environment.nsw.gov.au/QuarantineStationCCC">www.environment.nsw.gov.au/Quarantine Station CCC</a></p> <p>QSCCC Terms of Reference<br/>QSCCC Meeting Procedures</p>   | <p>Sighted the QSCCC Terms of Reference and Meeting Procedures [no document control]. The QSCCC, in providing input into this draft Audit Report, state that 'QSCCC follows the NPWS Terms of Reference as well as the later DPE 'Community Consultative Committee Guideline: State Significant Projects' (January 2019).'</p> <p>Minutes of QSCCC minutes for the audit period (refer to CoA 59) demonstrate that the committee is actively providing comment and recommendations to the co-proponents on proposals or relevant matters including the development and implementation of site-wide plans, the integrated monitoring program, annual environmental reports, comprehensive audit reports and compliance with the conditions of this approval. Furthermore, the committee appears to be providing a communication channel between the community, the co-proponents and the determining and approval authorities on matters relating to the Q Station</p> | Compliant |

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| 59 | <p>The QSCC shall meet at least quarterly during the first 3 years from the commencement date and thereafter on an as needs basis, as determined by the Committee. The Committee shall function for the duration of this approval. Minutes are to be taken for each Committee meeting.</p>   | <p><a href="http://www.environment.nsw.gov.au/QStationCCC">www.environment.nsw.gov.au/QStation CCC</a><br/> <a href="http://www.qstation.com.au/our-storey">www.qstation.com.au/our-storey</a><br/>         QSCCC Minutes #74, 10/11/21, Ref: DOC21/1014227, Draft<br/>         QSCCC Minutes #61, 15/02/18</p>   | <p>The QSCCC has met 74 times since commencement of the project. Draft minutes were available for review for the 74 meeting held on 10 November 2021. These minutes will be endorsed and finalised at the next scheduled meeting in March 2022.</p> <p>The following meeting minutes were available for review:</p> <ul style="list-style-type: none"> <li>• 73<sup>rd</sup> meeting – 11 August 2021</li> <li>• 72<sup>nd</sup> meeting – 12 May 2021</li> <li>• 71<sup>st</sup> meeting – 10 February 2021</li> <li>• 70<sup>th</sup> meeting – 18 November 2020</li> <li>• 69<sup>th</sup> meeting – 19 August 2020</li> <li>• 68<sup>th</sup> meeting – 12 February 2020</li> <li>• 67<sup>th</sup> meeting – 11 December 2019</li> <li>• 66<sup>th</sup> meeting – 14 August 2019</li> <li>• 65<sup>th</sup> meeting – 8 May 2019</li> </ul> <p>Meeting minutes were also available via Our Storey page of the Q Station website. Meeting minutes were also available on the Advisory Committees section of the Department's website.</p> <p>Based on the evidence provided the QSCCC is meeting on a regular basis and has been actively involved for the duration of the approval.</p> | Compliant |
| 60 | <p>The co-proponents shall:</p> <ol style="list-style-type: none"> <li>a) provide the Committee with regular information on the environmental performance and management of the activity;</li> <li>b) provide all relevant plans, including site-wide plans (as defined), to the Committee for comment prior to their approval by the relevant authority;</li> <li>c) ensure the Committee has reasonable access to the necessary plans and reports and is provided with sufficient time to carry out its functions;</li> <li>d) consider the recommendations and comments of the Committee and provide a response to the Committee;</li> <li>e) provide the Committee with access to sufficient resources to perform its functions, including: a meeting space; photocopying, phone and fax facilities; computer/printer and supervised access to the site;</li> <li>f) make any resolutions or decisions arising from Committee meetings available for public inspection within fourteen days of the Committee endorsing the written record of any such resolutions or decisions, or as otherwise agreed by the Committee; and</li> <li>g) shall, depending on the frequency of meetings and workload of the Committee, consider reimbursing community representatives for reasonable expenses associated with their work on the Committee.</li> </ol> | <p><a href="http://www.environment.nsw.gov.au/QStationCCC">www.environment.nsw.gov.au/QStation CCC</a><br/>         NPWS, Greater Sydney Branch, Sydney North Area Report to the QSCCC, 08/05/19<br/>         QSCCC Meeting and Reporting Cycle, May 2019<br/>         Letter - SNC Lavalin, Q Station Annual Environment Reports - Invitation to review reports and provide comments, 15/12/21, Ref: SN0243077</p> | <p>Section 4 of the QSCCC minutes for the 72<sup>nd</sup> meeting held on 12 May 2021 noted that reports were available to the committee for review, for example a weed control report.</p> <p>Sighted NPWS, Greater Sydney Branch, Sydney North Area Report to the QSCCC, dated 8 November 2019.</p> <p>Sighted QSCCC Meeting and Reporting Cycle, dated May 2019. The document identified in weeks tasks/milestones and responsibilities.</p> <p>Sighted a letter from SNC Lavalin, dated 15 December 2021 that invited the QSCCC to review the Annual Environment Reports for the Quarantine Station (Q Station which cover the reporting periods, from July 2018 – December 2019 and January 2020 – December 2020.</p>  | Compliant |



| Contractors |  |  |   |               |
|-------------|--|--|---|---------------|
| 61          | <p><b>Environmental Management System</b></p> <p>Contractors engaged in the undertaking of the activity must be able to demonstrate a commitment to environmental management. Demonstration should be by way of commitment to a recognised Environmental Management System in accordance with NSW Government guidelines and/or a proven satisfactory environmental management performance record.</p>  | <p>Contractor Induction Program<br/>Q Station Property Management Guide, V2<br/>Contractor Induction, Gasforce Pty Ltd, dated 2 February 2022.<br/>Interview with auditees 13/05/22</p>  | <p>Sighted Contractor Induction Program and sample record for subcontractor.<br/>Sighted the Property Management Guide which includes a table of preferred contractors.<br/><b>The Department requested, in its comments on the draft Audit Report, further evidence to demonstrate compliance with this condition. The auditees noted that many contractors' activities have negligible environmental impact (e.g.: service staff etc.). However the auditees did indicate that an Environmental Management Plan and Policy was able to be provided by Accor (the main operator), setting out its commitment to environmental performance. This information was not provided prior to the finalisation of this Report.</b></p> | Non-compliant |
| 62          | <p><b>Appropriately Skilled Contractors and Consultants</b></p> <p>All works, including those works identified in the DACMP as requiring specialist expertise, shall be carried out by:</p> <ol style="list-style-type: none"> <li><b>for construction works</b> - licensed, suitably qualified and, where appropriate, specialised tradespersons; and</li> <li><b>for planning and assessment works</b> - suitably qualified and specialised staff, consultants and/or contractors.</li> </ol>  | <p>Auditee Interview 03/02/22<br/>Certificate of Currency, Ezestream Pty Ltd, 09/06/21 to 06/06/22<br/>Workers Insurance, Ezestream Pty Ltd, 10/05/21<br/>Contractor Induction Program, Ezestream Pty Ltd, 01/02/18<br/>Job Safety Analysis, Ezestream Pty Ltd, 03/08/21<br/>Contractor Induction Program, Optimax Communication Pty Ltd, 01/02/2018</p> | <p>Mawland's preference is to have long-term contractors.<br/>The main on-site contractor was reported to be Ironbark Carpentry and Construction Pty Ltd<br/>Maintenance qualifications were reported to be kept on the computer of the Maintenance Manager; however, these were not requested or reviewed by the Auditor.<br/>Consultants are approved by Heritage.<br/>Mawland reported that they consult with NPWS for recommendations for consultants.<br/>Sighted sample of contractor licence / certificate (Ezestream Pty Ltd).</p>  | Compliant     |
| 63          | <p>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. The list shall include at least 3 specialists in each relevant field where possible. All specialists contracted to work on-site shall be those identified as a preferred contractor, unless otherwise approved by the Heritage Council and DEC</p>   | <p>Auditee Interview 03/02/22</p>  | <p>Works for P21 and P23 were reported to have been submitted and approved prior to the audit period.</p>   | Not Triggered |
| 64          | <p>The co-proponents shall ensure 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.</p>  | <p>Auditee Interview 03/02/22<br/>Contractor Induction Program<br/>DEC &amp; NPWS, North Head Quarantine Station, Environmental Management Plan, May 2005, Version 12</p>  | <p>Contractors are required to review and sign the Contractor Induction Program, to which the Auditor considered appropriate for the works being undertaken.</p>  | Compliant.    |
| 65          | <p><b>Training for Contractors and Staff Working on Heritage Site</b></p> <ol style="list-style-type: none"> <li>An induction and training program shall be developed by a suitably qualified person and provided to the following persons within 1 week of those persons commencing duties/works: <ul style="list-style-type: none"> <li>all contractors and sub-contractors, who will be required to attend such a program through the provision of a clause in all contracts for on-site works; and</li> <li>all staff employed on the site, including but not limited to shuttle bus driver(s) and ferry crew, whether on a permanent, temporary, contract or casual basis. Staff working on the site for a period longer than 12 months must undertake a refresher program every year. The program shall include, but not be limited to, an environmental management module outlining the natural and cultural heritage significance of the site and procedures to be followed while working on site.36; and</li> </ul> </li> <li>an education and awareness program shall be developed and provided by a suitably qualified person for companies providing services such as, but not limited to, coach and bus access, service delivery and other regular vehicle access to the site within one month of them accessing the site.</li> </ol> | <p>Contractor Induction Program<br/>Induction Register<br/>SNC Lavalin, Annual<br/>Environmental Report Quarantine Station North Head (MP08_0041)<br/>July 2018 to December 2019, 15/12/21<br/>Accor Induction</p>   | <p>Sighted Contractor Induction Program that includes requirements for contractors.<br/>The Auditor was inducted as a visitor during the site inspection.<br/>An induction register is maintained by the General Manager.<br/>Sighted the Accor Inductions that consisted of: Welcome and General Site Tour, Driving Induction, History Tour and 90 Day Induction Checklist.<br/>The 90 Induction Checklist included details concerning the Long-nosed Bandicoot and the Little Penguin.<br/><b>Evidence of annual refreshers having been delivered to all staff and contractors was not available.</b></p>   | Non-compliant |

| Information Management and Documentation |   |  |   |               |
|--|---|--|---|---------------|
| 66                                       | <p><b>Information Management System</b></p> <p>The co-proponents shall develop and implement a computer-based information management and Geographic Information System (GIS) for the site. The requirements of the <i>State Records Act 1998</i> and other relevant legislation, standards and guidelines shall be taken into account in developing the system.</p>   | <p>Auditee Interview 03/02/22</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p><b>A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66. The co-proponents do not share a document management system making it difficult for both parties to access and share key operational and compliance documentation.</b></p> <p><b>Develop and implement a computer-based information management and Geographic Information System (GIS) for the site</b></p> <p>CoA's that require the GIS to be implemented have not been identified as non-compliant, rather one overarching non-compliance has been identified for the lack of GIS. CoA's that require the GIS should be implemented as soon as a GIS is implemented.</p> <p>Documents are generally maintained as either hard copies in Building S7 or on the NSW Government's document management system.</p> <p>The Integrated Monitoring and Adaptive Management System (IMAMS) is not generally implemented.</p> | Non-compliant |
| 67                                       | <p>An outline of the system is to be submitted to the DEC for approval within 12 months of the commencement date. Implementation of the system must commence within 3 months of the date its approval.</p>  | Refer to CoA 66  | <p><b>A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66.</b></p>   | Non-compliant |
| 68                                       | <p>The primary role of the system shall be to document decision making by providing a record of all works and management actions taken, and provide current information on resources and assets at the site. The system must be regularly updated and record and reference a range of information, including but not limited to the following:</p> <ul style="list-style-type: none"> <li>h) all approvals issued for works;</li> <li>i) all works undertaken, including renovation, construction and regular maintenance works (date, what work, location etc);</li> <li>j) monitoring programs implemented;</li> <li>k) references to building plans, files, maps, design specifications and other documents;</li> <li>l) Conservation Works Program schedules, including a list of works (including regular maintenance works), priorities and when works are to be conducted (month/year);</li> <li>m) Moveable Heritage and Resources Plan (condition 85); and</li> <li>n) GIS data layers: <ul style="list-style-type: none"> <li>• location of lease boundary</li> <li>• locations of standing buildings, inscriptions, former fence lines and barriers, cultural landscape features and other historic structures, works and paths</li> <li>• archaeological information as per the requirements of the North Head Quarantine Station Archaeological Management Plan</li> <li>• locations of Aboriginal archaeological sites</li> <li>• locations of threatened flora species, Eastern Suburbs Banksia Scrub, and high-use foraging habitat for the Long-nosed Bandicoot<sup>38</sup></li> <li>• areas subject to bushfire hazard reduction and/or wildfires, including fire history</li> <li>• bush regeneration areas, including a history of works</li> <li>• locations of all existing and new site services and infrastructure</li> <li>• locations of all new works (including carparks, reconstructions, signs, lights, fences, paths) data from monitoring programs, as relevant (e.g. Longnosed Bandicoot and penguin mortalities).</li> </ul> </li> </ul> | Refer to CoA 66  | <p><b>A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66.</b></p>   | Non-compliant |
| 69                                       | <p>The co-proponents shall undertake a review of the <b>Information Management and GIS System</b> every five years after the commencement date for the duration of the activity. The review shall focus on the effectiveness of the system for managing data, and currency of information contained within the system, and be submitted to the DEC. The co-proponents shall comply with all reasonable requirements of the DEC with respect to the outcomes of the review.</p>  | Refer to CoA 66  | <p><b>A computer-based information management and Geographic Information System (GIS) had not been developed in accordance with the requirements of CoA 66.</b></p>   | Non-compliant |

| Aboriginal Heritage |   |   |  |               |
|---------------------|---|---|--|---------------|
| 70                  | <p>The co-proponents shall prepare and implement an <b>Aboriginal Heritage Management Plan</b> for the Quarantine Station in partnership with the relevant Aboriginal community group/s. The plan shall be submitted to the Heritage Council and DEC for approval within 12 months of the commencement date.</p> <p>The plan shall provide a strategic framework for conserving and managing Aboriginal cultural heritage values and provide a schedule of conservation works. It must consider all Aboriginal cultural heritage values associated with the Quarantine Station site, including physical sites, wild resource use, and social values in a traditional, historical and contemporary context.</p>  | Aboriginal Heritage Office, North Head Aboriginal Sites Management Report, 2008 | <p>The Aboriginal Heritage Management Plan was prepared in 2008 prior to the audit period. Approval of the plan was not available for review.</p>  | Compliant     |
| 71                  | <p>The plan shall address, but not be limited to, the following matters:</p> <ol style="list-style-type: none"> <li>the identification of key stakeholders and their interest;</li> <li>the identification and documentation, as appropriate, of Aboriginal cultural values, taking into account values associated more broadly with North Head, and provide a statement of significance;</li> <li>document the results of an audit of all Aboriginal sites known to occur in the lease area. The audit shall: <ul style="list-style-type: none"> <li>review and consolidate records from all previous investigations at the Quarantine Station<sup>40</sup></li> <li>record any previously unrecorded sites, and identify any site duplications</li> <li>develop an Aboriginal site data layer for use on the Quarantine Station GIS database (access restrictions to data will be determined in consultation with the relevant Aboriginal community group/s);</li> </ul> </li> <li>constraints and opportunities;</li> <li>conservation policy / objectives;</li> <li>strategies or actions;</li> <li>provide a schedule of conservation works required for Aboriginal sites within the lease area. The schedule should be based on the recent conservation assessment conducted by AMBS (2002) for the NPWS, and shall be incorporated into the Conservation Works Program (condition 78);</li> <li>management responsibilities, performance measures and monitoring procedures; and</li> <li>liaise with DEC and use the information to update the NPWS Aboriginal Heritage Information Management System.</li> </ol> | Aboriginal Heritage Office, North Head Aboriginal Sites Management Report, 2008 | <p>The requirements of CoA 71 are addressed as follows:</p> <ol style="list-style-type: none"> <li>Addressed in Appendix H.</li> <li>Addressed in Section 6 and Appendix I.</li> <li>Addressed in Section 8. Refer to CoA 66 concerning the GIS.</li> <li>Addressed in Sections 7, 9, 10 and 11 and Guidelines A, B, C and D.</li> <li>Addressed in Sections 7, 9, 10 and 11 and Guidelines A, B, C and D.</li> <li>Addressed in Sections 7, 9, 10 and 11 and Guidelines A, B, C and D.</li> <li>Addressed in Appendix G.</li> <li>Addressed in Sections 10 and 11 and Guidelines B and Appendix G.</li> <li>Addressed in Appendix G.</li> </ol> | Compliant     |
| 72                  | <p>The co-proponents shall undertake a review of the <b>Aboriginal Heritage Management Plan</b> every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with the Heritage Council, DEC and relevant Aboriginal stakeholders. On the basis of the review the co-proponents shall, as necessary, prepare a revised Aboriginal Heritage Management Plan to be submitted to the Heritage Council and DEC for approval.</p>  | Aboriginal Heritage Office, North Head Aboriginal Sites Management Report, 2008 | <p><b>The Aboriginal Heritage Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department and Heritage since 2008. Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p>  | Non-compliant |
| 73                  | <p>Any conservation works for Aboriginal sites are to be undertaken in accordance with the plan and schedule of conservation works and in consultation with the relevant Aboriginal community group/s.</p>  | Auditee Interview 03/02/22  | <p>No conservation works for Aboriginal sites was conducted during the audit period.</p>   | Not Triggered |

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| 74                       | <p>The co-proponents will 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. These aspects shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>a) the development of protocols for Aboriginal community involvement in the management of Aboriginal heritage within the lease area;</li> <li>b) the development of educational material and tours interpreting Aboriginal heritage;</li> <li>c) opportunities for establishing a centre for Aboriginal cultural heritage on site;</li> <li>d) on-going evaluation of the Aboriginal cultural heritage values of the site (to include both new information on historical associations and emerging contemporary values of the place, such as wild resource use); and</li> <li>e) other relevant matters identified in consultations between the co-proponents and the Aboriginal communities.</li> </ul> <p>Relevant groups and individuals to be consulted shall be determined in consultation with the DEC.</p>  | <p>Auditee Interview 03/02/22 and 13/05/22<br/>         Email – NPWS, North Head Concept Plan: distribution and opportunity for comment, 17/10/19 @13:53hrs<br/>         QSCCC Meeting Minutes, 14/08/19, 12/02/20<br/>         Email – North Head/Quarantine Station, 10/01/20 @13:50hrs</p> | <p>The co-proponents reported there have been concerted efforts to engage with traditional owners but that interest in joining the QSCCC has been limited during the audit period. Sighted an email from a Professor of Indigenous Entrepreneurship dated 10 January 2020 confirming they would like to re-join the QSCCC.</p> <p>Commercial relationships have been established with traditional owners and NPWS have received feedback from the community.</p> <p>NPWS reported that they engaged with traditional owners as part of the development for the 2019 North Head Precinct Plan which included matters related to the Q Station. An email from NPWS to various stakeholders dated 17 October 2019, including, but not limited to a Professor of Indigenous Entrepreneurship, Mawland, Harbour Trust and Northern Beaches Council, requesting comment on the North Head Concept Plan, in particular the incorporation of Indigenous connection to county was sighted.</p> <p>The auditees state that the facility has now been in operation for 15 years with the design and implementation of protocols and opportunities around Aboriginal heritage having been established well before the current audit period. Further, they advise that operations during the current audit period have not involved the altering of Aboriginal heritage aspects.</p> | Compliant     |
| 75                       | <p>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.</p>   | Site Inspection   | <p>No promotion of or public access to Aboriginal sites within the Q Station were observed during the site inspection.</p>  | Compliant     |
| 76                       | <p>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. The location and design of the fence shall:</p> <ul style="list-style-type: none"> <li>a) be determined in consultation with the relevant Aboriginal community groups;</li> <li>b) take into account fencing requirements for the protection of Little Penguin habitat (see condition 174); and</li> <li>c) be designed in consultation with the DEC prior to the lodgement of an application for construction work</li> </ul>   | Site Inspection   | <p>A fence was observed near the southwest end of Building A14-17 to limit public access to Cannae Point during the site inspection (refer to photograph in Appendix F).</p> <p>Building A14-17 is known as the Luggage Store Visitor Centre, formerly the luggage sheds along the Wharf. Cannae Point is peninsula located approximately 140 m to the south-west of the Luggage Store Visitor Centre.</p>  | Compliant     |
| <b>Historic Heritage</b> |  |   |   |               |
| 77                       | <p><b>Conservation Works Program</b></p> <p>For the purposes of the following conditions of approval, conservation works are those works that are essential and necessary to retain the cultural significance of the place. This may include, but is not limited to:</p> <ul style="list-style-type: none"> <li>a) building, landscape and infrastructure works to the extent that these demonstrably contribute to the physical conservation of the site;</li> <li>b) curatorial work on inscriptions, archives, artefacts and moveable heritage;</li> <li>c) environmental management programs, such as erosion, weed and feral animal control;</li> <li>d) a portion of works to improve visitor access within the site (being basic works, such as disabled access ramps, that are considered essential to provide equitable access and to minimise visitor impacts); and</li> <li>e) a portion of works to improve visitor understanding of the significance of the place (being basic works, such as interpretive displays).</li> </ul> <p>It does not include:</p> <ul style="list-style-type: none"> <li>a) works associated with the planning, design and the physical reconstruction of buildings P21, P22, P23 and H1;</li> <li>b) assessment work or documentation undertaken as part of the preparation of the EIS or PAS, including design drawings;</li> <li>c) assessment work or documentation to be undertaken as part of the preparation of detailed design plans for proposed adaptation work; or</li> <li>d) works completed prior to the commencement date, with the exception of urgent works identified in the DACMP.</li> </ul> | <p>Conservation Works Program – Stage 1, June 2006<br/>         Auditee Interview 03/02/22 and 13/05/22<br/>         Site Inspection</p>  | <p>Section 1.3 of the CWP Stage 1 defined the conservation works for Stage 1.</p> <p>No conservation works were conducted during the audit period and none were observed during the site inspection.</p> <p>All conservation works were completed prior to the audit period. Ongoing maintenance is conducted as required.</p>  | Not Triggered |



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| 78 | <p>The co-proponents shall prepare and submit a final <b>Conservation Works Program (CWP)</b> to the Heritage Council and the DEC for approval as follows:</p> <ul style="list-style-type: none"> <li>a) Stage 1 of the CWP encompassing works required for all buildings, structures and landscape elements, including but not limited to those identified in the DACMP and the asbestos sampling and replacement strategy (condition 111), shall be prepared within six months of the commencement date; and</li> <li>b) Stage 2 of the CWP encompassing all works identified for Aboriginal sites (condition 70), the Moveable Heritage and Resources Plan (condition 85), Heritage Landscape Master Plan (condition 91), Inscriptions Plan (Condition 95), Interpretation Plan (condition 100) and Infrastructure Control Plan (as relevant – condition 105) shall be prepared and incorporated into the CWP as soon as practicable.</li> </ul>   | <p>Conservation Works Program – Stage 1, June 2006<br/>Asbestos Register 2020</p>   | <p><b>Observation: The Conservation Works Program Stage 1 was prepared for priority works to be conducted within one to four months of approval.</b></p> <p><b>The forecast maximum time periods for each stage was: Stage 1 – 4 months; Stage 2 – 8 months; Stage 3 – 6 months; and Stage 4 – 6 months. This equated to a two-year period. CWPs for Stages 2,3 and 4, whilst outside the audit period, were not available for review. Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response NPWS states that CWPs for stages 2 and beyond were never prepared.</b></p>   | Not Triggered. |
| 79 | <p>For all heritage items covered by condition 78) above, the CWP shall include, but not be limited to the following:</p> <ul style="list-style-type: none"> <li>a) identification of all conservation works and priorities at a site level. This should identify urgent works (0-1 year), medium term work (1-3 years) and long term work (3-5 years);</li> <li>b) identification of all works relevant to ensuring public health and safety for each building or historic item (such as the removal and stabilisation of asbestos materials);</li> <li>c) identification of any issues requiring further assessment or research, an approach for addressing this, and a timeframe where appropriate;</li> <li>d) an outline of the methodology, materials and standards to be followed for all maintenance works; and</li> <li>e) identification of any on-going monitoring requirements.</li> </ul>  | <p>Conservation Works Program – Stage 1, June 2006<br/>Asbestos Register 2020</p>   | <ul style="list-style-type: none"> <li>a) The CWP Works Schedule (Section 7) prioritises works into Urgent, Medium or Long Term.</li> <li>b) Many works improve public health and safety, such as the removal or sealing of asbestos, removal of lead-based paint as part of the painting program, repair of roads and pathways, repair of decking and windows, stabilisation of embankments, and repair or introduction of new fences, barriers and gates.</li> <li>c) Most of the research required to implement the CWP Stage 1 was undertaken as part of the preparation of the document. Examples include research into former paint schemes for the external paint scheme (Section 6), research to support monitoring indicator benchmarks and research to support works specifications. Further research to assist with infrastructure and landscape works will form a part of the development / implementation of site wide plans.</li> </ul> | Compliant      |
| 80 | <p>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, as amended by condition 31).</p>  | <p>Conservation Works Program – Stage 1, June 2006</p>  | <p>Urgent and Medium-term priority works occurred prior to the audit period.</p>  | Compliant      |
| 81 | <p>All conservation works, excluding minor maintenance repairs or works (as defined), shall be conducted in accordance with the Conservation Works Program.</p>   | <p>Auditee Interview 03/02/22<br/>Site Inspection<br/>Conservation Works Program – Stage 1, June 2006</p>   | <p>No conservation works were conducted during the audit period and none were observed during the site inspection.</p>  | Not Triggered  |
| 82 | <p>The co-proponents shall undertake a review of the CWP concurrent with or prior to the first comprehensive audit of the activity (condition 228), and thereafter on an annual basis as part of the overall annual environmental report (condition 221). An annual review is not required in the year that a comprehensive review of the CWP occurs (condition 83).</p> <p>The review must be undertaken in consultation with the DEC and the Heritage Council, and include:</p> <ul style="list-style-type: none"> <li>d) a list of conservation works implemented;</li> <li>e) the identification of any additional conservation works required to be undertaken. This must include specific consideration of the condition of all asbestos items and actions required to ensure that public health and safety standards are met ; and</li> <li>f) information on the amount spent on conservation works (including maintenance works) within the site annually, together with independent verification of expenditures provided by a quantity surveyor. The information should include a breakdown on costs and works undertaken.</li> </ul> <p>Advice must be sought from the relevant Aboriginal community group/s, an appropriately qualified and experienced conservation practitioner and other specialists as required in the review process.</p> | <p>Auditee Interview 03/02/22<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/>Asbestos Register 2020</p> | <p><b>There was no evidence to demonstrate a review of the Conservation Works Program had occurred concurrent with or prior to the first comprehensive audit of the activity (condition 228), and thereafter on an annual basis as part of the overall annual environmental report.</b></p> <p><b>The Comprehensive Works Program should be reviewed and updated where required to align with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p>  | Non-compliant  |
| 83 | <p>The co-proponents shall undertake a regular comprehensive review of the CWP concurrent with or prior to the on-going (5 yearly) comprehensive audits of the activity (condition 228). The review shall be undertaken in consultation with the Heritage Council and the DEC. In addition to the matters referred to above, the review shall include a re-assessment of the condition of each heritage item (historic and Aboriginal) and a reassessment of conservation priorities.</p>   | <p>Auditee Interview 03/02/22<br/>Conservation Works Program – Stage 1, June 2006</p>   | <p><b>There was no evidence to demonstrate a regular comprehensive review of the Conservation Works Program had occurred concurrent with or prior to the on-going (5 yearly) comprehensive audits of the activity. The review has not been provided to accompany this Audit Report.</b></p>   | Non-compliant  |
| 84 | <p>On the basis of the comprehensive review and the outcomes of the comprehensive audit process (condition 226) the co-proponents shall, as necessary, prepare a revised CWP to be submitted to the DEC and the Heritage Council for approval.</p>  | <p>Auditee Interview 03/02/22</p>   | <p>This requirement was not triggered during the audit period.</p>  | Not Triggered  |

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| 85 | <p><b>Moveable Heritage and the Resource Collection</b></p> <p>The co-proponents shall submit a <b>Moveable Heritage and Resource Collection Plan</b><sup>41</sup> within 12 months of the commencement date. The plan shall include all items of moveable heritage and items from the resource collection. The plan shall address the requirements of the <i>State Records Act 1998</i> and other relevant legislation and be prepared by a suitably qualified person with demonstrated skills and experience in the management of archival collections.</p> <p>The plan shall be reviewed by the Heritage Advisor and submitted to the DEC and the Heritage Council for approval. Implementation of the plan must commence within 3 months of its approval.</p>   | <p>Sydney Artefacts Conservation, North Head Quarantine Station Moveable Heritage &amp; Resources Collections Management Plan, February 2007</p> <p>Letter Heritage NSW to WolfPeak, 05/04/22</p> | <p>The Moveable Heritage and Resource Collection Plan was approved by the Deputy Director-General Parks and Wildlife Division on 20 April 2007 and the Executive Director, Heritage Office for the Department on 10 August 2007.</p> <p>Heritage NSW, in their response to the draft Audit Report, notes that a revised Quarantine Station Moveable Heritage and Resource Collection Plan (dated 2021) was submitted to Heritage NSW on 9 February 2022 (after the current audit period) for review.</p> | Compliant |
| 86 | <p>The plan shall include, but not be limited to:</p> <ol style="list-style-type: none"> <li>a) the documentation and recording of all moveable heritage and resource collection items, to be registered on a database system;</li> <li>b) a condition assessment of each moveable heritage item and, as appropriate, items in the resource collection and a prioritised schedule of conservation works required. This shall be incorporated into the Conservation Works Program (condition 78);</li> <li>c) collection management guidelines, including: <ul style="list-style-type: none"> <li>• a system for referencing and recording information for all items, with an ability to incorporate new information and/or items as it becomes available;</li> <li>• storage requirements for all items, including: <ul style="list-style-type: none"> <li>○ consideration of whether items should be stored on or off-site.</li> <li>○ conservation requirements for housing and storing items- an approach to the documentation and storage of fabric and materials removed during construction and adaptation works. This should consider the requirements outlined in the DACMP; and</li> </ul> </li> <li>• a system and protocols for public access to items, and the loan of items outside the Quarantine Station;</li> </ul> </li> <li>d) fabric and material sampling guidelines, with reference to the minimum requirements outlined of the Archaeological Management Plan; and</li> <li>e) identify and implement a system for cross-referencing the collections held by other institutions (e.g. State Records NSW and the National Archives of Australia) which relate to the Quarantine Station site.</li> </ol> | <p>Sydney Artefacts Conservation, North Head Quarantine Station Moveable Heritage &amp; Resources Collections Management Plan, February 2007</p>  | <p>The requirements of CoA 86 are addressed as follows:</p> <ol style="list-style-type: none"> <li>a) Addressed in Section 2.5 &amp; Appendix 7.</li> <li>b) Addressed in Section 2.5 &amp; Appendix 7.</li> <li>c) Addressed in Section 3.2, 4.1, 4.3, 4.5 and 6.1.</li> <li>d) Addressed in Section 2.3, 3.2 and 4.3.</li> <li>e) Addressed in Section 4.6.</li> </ol>   | Compliant |
| 87 | <p>No items of moveable heritage or items from the resource collection shall be used for display purposes or made available on loan outside the Quarantine Station until the <b>Moveable Heritage and Resources Plan</b> has been adopted</p>   | <p>Sydney Artefacts Conservation, North Head Quarantine Station Moveable Heritage &amp; Resources Collections Management Plan, February 2007</p> <p>Letter Heritage NSW to WolfPeak, 05/04/22</p> | <p>A Moveable Heritage and Resource Collection Plan was prepared in 2007. The Plan was approved by the Deputy Director – General Parks and Wildlife Division on 20 April 2007 and the Heritage Office on 10 August 2007.</p> <p>Heritage NSW, in their response to the draft Audit Report, notes that a revised Quarantine Station Moveable Heritage and Resource Collection Plan (dated 2021) was submitted to Heritage NSW on 9 February 2022 (after the current audit period) for review.</p>         | Compliant |

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| 88 | The display, storage, loan and public access of moveable heritage must be undertaken in accordance with the <b>Moveable Heritage and Resources Plan</b> .  | Sydney Artefacts Conservation, North Head Quarantine Station Moveable Heritage & Resources Collections Management Plan, February 2007<br>Auditee Interview 03/02/22<br><a href="http://www.ehive.com">www.ehive.com</a> - Sydney Quarantine Station Movable Heritage Collection, [Accessed 09/02/22 @ 11:00am]<br>Lease AC928975B, 26/10/06<br>NPWS comments on draft Audit Report, 08/03/22 | The Quarantine Station collection is catalogued using the Ehive Collections Management database. This is the definitive database, which commenced on 3 May 2010. NPWS has prepared project plans to assist the lessee with their responsibilities for maintaining and enriching the database. This includes a plan to recruit volunteers to assist and to train lessee's staff. Implementation of these plans has been delayed due to Covid restrictions.<br>The curator has prepared the revised and updated draft Movable Heritage Collection Plan 2021.<br>Mawland management reported that no moveable heritage items were loaned out during the audit period.<br>Moveable heritage items (excl. large items such as furniture etc.) observed to be displayed in cases in various buildings during the site inspection.<br>Moveable heritage items that are not on display are stored in Building P14. Items are registered in three separate inventories, one being Ehive an online public register. The Ehive page for the Q Station lists 2,665 items.<br>Delicate items were observed to be wrapped and protected and fragile items were stored on shelving in a dedicated air conditioning room inside Building P14.                 | Compliant |
| 89 | The co-proponents shall undertake a review of the <b>Moveable Heritage and Resources Plan</b> every five years after the commencement date for the duration of the activity. On the basis of the review the co-proponents shall, as necessary, prepare a revised Moveable Heritage and Resources Plan to be submitted to the DEC and Heritage Council for approval.  | DPIE, Endorsement of the Quarantine Station Moveable Heritage Collection Plan 2021 for progression to the Heritage Council of NSW, 19/10/21<br>Sydney Artefacts Conservation, North Head Quarantine Station Moveable Heritage Collection Plan 2021, Final Plan   | Sighted Quarantine Station Moveable Heritage Collection Plan 2021, Final Plan.<br>Sighted a Department <i>Endorsement of the Quarantine Station Moveable Heritage Collection Plan 2021 for progression to the Heritage Council of NSW</i> dated 19 October 2021 that was approved by the Acting Executive Director Conservation and Aboriginal Partnerships, NPWS and that approved submission of the document to Heritage Council of NSW for endorsement. The endorsement noted that the Movable Heritage Collection Plan was prepared by the NPWS Historic Heritage team in consultation with the lessee, Mawland. A Senior Compliance Officer in the Department of Planning, Industry and Environment was consulted on the requirements of the conditions of approval (2003) and advised that Heritage Council of NSW endorsement of the revised plan is necessary.<br>The Quarantine Station Moveable Heritage Collection Plan 2021, Final Plan had not been approved by the Heritage NSW at the time of the audit. Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response NPWS states that the Movable Heritage Collection Plan was submitted to Heritage NSW on 9 February 2022. | Compliant |
| 90 | <b>Heritage Landscape Master Plan</b><br>The cultural landscape will be conserved, managed and interpreted primarily to reflect its 1958-84 form (the Aviation phase). The interpretation of earlier landscape conditions is appropriate providing there is demonstrated compliance with the policies in the QSCMP, DACMP and Interpretation Plan (condition 100) or a clear justification for any proposed variances. | Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br><i>Heritage Landscape Masterplan Inscriptions Conservation Management Plan</i>  | The Heritage Landscape Masterplan is incorporated into the Heritage Landscape Management Plan which was presented to the QSCCC on 17 August 2005 and approved by the Heritage Council and NPWS on 16 September 2006.<br>Section 1.4.1, 2.2.3 and Section 2.3. Also refer to the Interpretation Plan Table 4.3   | Compliant |
| 91 | The co-proponents shall engage a qualified horticulturist, arborist and heritage landscape specialist to prepare a site wide Heritage Landscape Master Plan within 18 months of the commencement date. The plan shall be reviewed by the Heritage Advisor and submitted to the DEC and Heritage Council for approval.  | Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br><i>Heritage Landscape Masterplan Inscriptions Conservation Management Plan</i>  | The Heritage Landscape Master Plan notes that the qualifications and experience of the authors was delivered to the Heritage Office and DEC in 2003 to meet Approval CoA 63.<br>Qualified arborists were included in the project team approved as part of the initial submission for CoC 63. Team members are listed in Appendix B of the Heritage Landscape Master Plan.<br>The plan was reviewed by the NSW Heritage Office and DEC, as identified on the Declaration sheet inside the cover.   | Compliant |



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| 92 | <p>The Plan must address, but not be limited to:</p> <ol style="list-style-type: none"> <li>a) objectives for the management of the cultural landscape, including geology and soils, cultural plantings, bushland, paths and edgings, fences and walls, cemeteries, grave markers, and former landscape features;</li> <li>b) an assessment of the condition of existing cultural plantings (including grassed areas), walls, fences, stormwater drains, paths and edgings, and identification of areas of soil erosion and contamination;</li> <li>c) a prioritised schedule of conservation and/or remediation works, to be incorporated into the Conservation Works Program (condition 78);</li> <li>d) proposed changes to the existing landscape, to be supported by research where necessary;</li> <li>e) proposed management protocols, practices and maintenance works for all landscape features. This should include, but not be limited to: <ul style="list-style-type: none"> <li>• stabilisation of eroded areas</li> <li>• drainage, irrigation and use of fertilisers</li> <li>• treatment of lawn edges and bushland/lawn interfaces, including natural regenerated areas where these have encroached on significant historic sites</li> <li>• monitoring and treatment of trees</li> <li>• species list and guidelines for cultural plantings, including a re-planting strategy</li> <li>• the introduction of new plant or organic materials</li> <li>• materials and construction techniques to be used in landscaping works.</li> </ul> </li> <li>f) a bush regeneration program (as defined);</li> <li>g) identify general areas where the planting of new vegetation to provide small-scale shelter habitat for Long-nosed Bandicoots could occur without significant impact on the cultural landscape (condition 165);</li> <li>h) monitoring requirements; and</li> <li>i) consider the following specific issues: <ul style="list-style-type: none"> <li>• <b>First Class Precinct Plan</b> – options for re-instatement of the covered walkway from Building P6 to Building P5, as required by the DACMP, and potential impacts associated with these;</li> <li>• <b>Third Class / Asiatic Precinct</b> – options for reinstatement of selected former access paths within the precinct as an interpretive tool;</li> <li>• <b>Entry area at Building A2</b> (refer Schedule 3) – identify appropriate design outcomes for the entry area at Building A2 and consider options such as a courtyard or reversible deck, to balance the new uses for this area with the unadorned nature of the Quarantine Station landscape and the historical and archaeological context of the location; and</li> <li>• <b>Second Cemetery</b> – identify options for formalising access to and within the Second Cemetery, including options for a single stabilised path or constructed walkway. Consideration should be given to: design and materials; and potential environmental impacts and mitigative strategies</li> </ul> </li> </ol> | <p>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006</p> <p><i>Heritage Landscape Masterplan<br/>Inscriptions Conservation<br/>Management Plan</i></p> | <p>The Heritage Landscape Master Plan included the requirements of CoA 92 and had not been updated or reviewed since approved in 2005/2006.</p> | Compliant     |
| 93 | <p>All landscape works, excluding minor maintenance works (as defined), are to be undertaken in accordance with the adopted <b>Heritage Landscape Master Plan</b>, with the following exceptions:</p> <ol style="list-style-type: none"> <li>a) <b>car park construction</b> – where an application for construction works is approved prior to the adoption of the Plan; and.</li> <li>b) <b>the establishment of a stabilised path or walkway in the Second Cemetery (condition 92)</b> – where an application for construction works is approved prior to the adoption of the Plan.</li> </ol>   | <p>Site Inspection<br/>Auditee Interview 03/02/22</p>  | <p>No landscape works were conducted during the audit period and none was observed during the site inspection.</p>                              | Not Triggered |

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| 94 | <p>The co-proponents shall undertake a review of the <b>Heritage Landscape Master Plan</b> every five years after the commencement date for the duration of the activity. The review shall be undertaken with advice from a heritage landscape specialist and other relevant specialists. On the basis of the review the co-proponents shall, as necessary, prepare a revised Heritage Landscape Master Plan to be submitted to the DEC and the Heritage Council for approval.</p>   | <p>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br/><i>Heritage Landscape Masterplan<br/>Inscriptions Conservation<br/>Management Plan</i></p>                      | <p><b>The Heritage Landscape Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department and Heritage since May 2006.</b></p> <p><b>Review and update the Heritage Landscape Management Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p> <p>The Heritage Landscape Masterplan is incorporated into the Heritage Landscape Management Plan which was presented to the QSCCC on 17 August 2005 and approved by the Heritage Council and NPWS on 16 September 2006.</p>  | Non-compliant |
| 95 | <p><b>Inscriptions / Engravings</b></p> <p>The co-proponents shall engage an appropriately qualified and experienced conservation specialist in rock art or stone conservator to prepare an <b>Inscriptions Management Plan</b> within 18 months of the commencement date. The plan shall be reviewed by the Heritage Advisor and submitted to DEC and the Heritage Council for approval.</p> <p>The plan will cover the engravings, inscriptions, pit cover engravings and wall inscriptions together with options for managing public access such as fencing and re-alignment of the lower walkway from the Hospital to Wharf Precincts.</p> <p>The plan shall:</p> <ol style="list-style-type: none"> <li>provide a brief description of the location, significance and condition of all engravings and inscriptions within the site;</li> <li>identify the need for further recording or documentation of engravings and inscriptions;</li> <li>outline objectives and strategies for the management of the engravings and inscriptions. In identifying management options, an assessment of potential environmental impacts of works must be undertaken and incorporated into the document. At a minimum, this must address all works requiring direct contact with the surface of inscriptions and engravings, such as cleaning, graffiti removal, taking of moulds and repainting;</li> <li>provide a prioritised schedule of works, including conservation works and a maintenance program, as required, to be incorporated into the Conservation Works Program (condition 78); and</li> <li>develop an on-going monitoring program to assess the condition of engravings and inscriptions.</li> </ol> | <p>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br/><i>Heritage Landscape Masterplan<br/>Inscriptions Conservation<br/>Management Plan</i><br/>Inscriptions Map</p> | <p>This requirement occurred prior to the audit period.</p> <p>The Inscriptions Management Plan is incorporated as Appendix C of the Heritage Landscape Management Plan which was presented to the QSCCC on 17 August 2005 and approved by the Heritage Council and NPWS on 16 September 2006.</p> <ol style="list-style-type: none"> <li>Section 2 maps the location and density of inscriptions, the age distribution of inscriptions, the type of inscriptions, significance and condition overall and by precinct. Section 2 also contrasts this information with the significance and condition of inscriptions outside the lease area, at Old Mans Hat.</li> <li>Section 4 (Table 4.4) provides policies for monitoring and further research. Section 6.5 (Table 5.4) provides monitoring and research actions.</li> <li>Section 4 provides policies / objectives. Section 5 provides strategies and actions. Section 6 provides an assessment of potential environmental impacts of works, particularly those requiring direct contact</li> <li>Works including conservation and maintenance are identified in Section 5. Where incorporated into the Conservation Works Program.</li> <li>Section 4 (Table 4.4) provides policies for monitoring and further research. Section 5 (Table 5.4) provides monitoring and research actions.</li> </ol> | Compliant     |
| 96 | <p>The co-proponents shall undertake a review of the <b>Inscriptions Management Plan</b> every five years after the commencement date for the duration of the activity. The review shall be undertaken with advice from relevant specialists. On the basis of the review the co-proponents shall, as necessary, prepare a revised Inscriptions Management Plan to be submitted to the DEC and the Heritage Council for approval.</p>   | <p>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br/><i>Heritage Landscape Masterplan<br/>Inscriptions Conservation<br/>Management Plan</i></p>                      | <p><b>The Inscriptions Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department and Heritage since May 2006.</b></p> <p><b>Review and update the Inscriptions Management Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p>  | Non-compliant |
| 97 | <p>No works shall be undertaken on, or in respect to the inscriptions or engravings prior to the adoption of the <b>Inscriptions Management Plan</b>. Any interim arrangements to manage access to the inscriptions for interpretive purposes must be approved by the DEC and the Heritage Council.</p>  | <p>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br/><i>Heritage Landscape Masterplan<br/>Inscriptions Conservation<br/>Management Plan</i></p>                      | <p>The Inscriptions Management Plan was approved by the Heritage Council and NPWS on 16 September 2006.</p> <p>Given the Inscriptions Management Plan was approved in 2006 it is assumed that no arrangements were necessary and that no works were undertaken on, or in respect to the inscriptions or engravings prior to the adoption of the Inscriptions Management Plan.</p>   | Compliant     |

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| 98 | <p>All conservation works on the engravings and inscriptions shall be undertaken by an appropriately qualified and experienced conservation specialist. For the rock engravings, this means a qualified and experienced rock art or stone conservator.</p>  | <p>Auditee Interview 03/02/22<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/> Email – Mawland to Heritage Council, Quarantine Station Manly-Inscriptions, 16/08/18 @16:34hrs<br/> Email – Mawland to NPWS, QStation Inscriptions, 02/08/18 @11:03hrs<br/> JK Geotechnics, Geotechnical Inspection Rock Face Stability Site Report, 25/03/21</p> | <p>No conservation works on the engravings and inscriptions were conducted during the audit period.<br/> Mawland management reported that the stone mason recommended by the Heritage Council was not willing to undertake certain works to a number of inscriptions and the Heritage Council has not approved the works to be undertaken by the University of Sydney.<br/> Sighted an email from Mawland to the Heritage Council dated 16 August 2018 concerning conservation works to the inscriptions and that requested confirmation that the works may proceed.<br/> Sighted emails from Mawland to NPWS dated August 2018 concerning works to the inscriptions.<br/> A rock fall occurred in the inscription area in March 2021.<br/> Inscriptions were 3D x-rayed in 2017.</p>  | Not Triggered |
| 99 | <p><b>Internal Fit out</b><br/> The co-proponents shall engage a suitably qualified and experienced person to prepare a site wide plan for internal building fitout within 12 months of the commencement date. The plan shall be reviewed by the Heritage Advisor and submitted to DEC and the Heritage Council for approval. All internal fittings installed across the site must be consistent with the adopted plan.<br/> The Plan shall:</p> <ul style="list-style-type: none"> <li>c) outline the specifications and style of all new plumbing, telecommunication and electrical fittings, and floor coverings to be installed across the site. It must include taps, spouts, shower heads, basins, baths, toilets, electrical fittings, carpets and floor tiling, etc, and demonstrate consistency with the relevant policies of the DACMP; and</li> <li>d) outline an approach to sampling of bathroom and toilet fitouts across the site from the 1958-62 period, taking into account the relevant policies of the DAC</li> </ul> | <p>Paul Davies Architects &amp; Cate Young Design, Internal Fitout Plan Part 1, November 2005<br/> Letter – NSW Heritage Office, Conditional Endorsement of Quarantine Station Internal Fitout Plan, Ref: HRL37473, 13/12/05<br/> Letter – NPWS, Approval of the Internal Fitout Plan Part 1, 25/01/06<br/> <a href="http://www.environment.nsw.gov.au">www.environment.nsw.gov.au</a></p>  | <p><b>Observation</b><br/> <b>The Internal Fitout Plan – Part 1 has not been updated since November 2005.</b><br/> <b>Review and update the Internal Fitout Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b><br/> This requirement occurred prior to the audit period.<br/> The Internal Fitout Plan was presented to the QSCCC on 3 February 2005 and conditionally endorsed by the Heritage Council and the Heritage Office on 13 December 2005 and approved by NPWS on 25 January 2006.<br/> The letter from Heritage Office noted that the plan was prepared in two parts, considering accommodation buildings first, followed by the remaining buildings. The plan was conditionally endorsed subject to approval of the document's second part.<br/> Management plans were available at:<br/> <a href="https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans">https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans</a> at the time of the audit.</p> | Not Triggered |

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| 99A | <p>a) An Excavation Permit must be obtained before the commencement on site of any works involving potential disturbance of relics. An archaeologist (Excavation Director) approved by the Heritage Council must be appointed to undertake all archaeological work.</p> <p>b) The research design outlined in the Quarantine Station <b>Detailed Area Conservation Management Plan (QSDACMP)</b> must form the basis for interpretation of archaeological deposits and relics.</p> <p>c) Provision must be made in a public area of the Quarantine Station site to display relics or other historical or research material relevant to the historical development of the site. This display must be integrated with the Interpretation Plan.</p> <p>d) Should substantial intact archaeological deposits or features not identified in the Archaeological Assessment be discovered, work must cease in the affected area(s) and the Heritage Office contacted for advice. Additional assessment and approval may be required prior to works continuing in the affected area(s) based on the nature of the discovery.</p> <p>e) The archaeologist must remain present during the course of all excavation works in the archaeologically sensitive areas of the proposed development.</p> <p>f) The archaeologist must be allowed access to archaeological deposits at all times during mechanical excavation and mechanical excavation must cease at the request of the archaeologist, to allow for investigation of archaeological remains.</p> <p>g) Opportunities for public visitation to the site will be provided during the program of archaeological works and, where appropriate, community and student volunteers will be invited to participate in field work.</p> <p>h) The excavation permit will be valid only while the approved excavation is being carried out under the direction of the nominated Excavation Director</p> <p>i) The Excavation Director must carry out the excavation in accordance with the approved research design and methodology. Any substantial deviations from the approved research design (including extent and techniques of excavations) must be approved by the Director, Heritage Office.</p> <p>j) The Excavation Director must take adequate steps to record relics, structures and features discovered on the site during the excavation in accordance with current best practice guidelines and the approved research design</p> <p>k) The co-proponents must endeavour to ensure that the unexcavated artefacts, structures and features are not subject to deterioration, damage or destruction.</p> <p>l) The co-proponents shall be responsible for the safe-keeping of all relics recovered from the site.</p> <p>m) The Excavation Director shall be responsible for ensuring that the artefacts are cleaned, stabilised, identified, labelled, catalogued and stored in a way that allows them to be retrieved according to both type and provenance.</p> <p>n) The Heritage Council and the Heritage Office reserve the right to inspect the site and records at all times and access any relics recovered from the site.</p> <p>o) The co-proponents shall prepare a final report on the excavation, to publication standard, within one year of the conclusion of the project unless an extension of time is approved by the Heritage Council. Two copies of this report must be submitted to the Heritage Office. A further copy must be retained on site as part of the interpretive collection.</p> | <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p>An Excavation permit (S60 No 2011/S60/85) for the reconstruction of Buildings P21 and P23 was originally issued and approved on 26 March 2012. Subsequently a Section 65a was lodged to vary the design of the proposed new building (S65a/2016/41). Approval for the new design was received on 14 February 2017.</p> <p>Archaeological monitoring was carried out by Austral Archaeology Pty Ltd as part of the ongoing archaeological investigations of the Buildings P21 and P23 and followed the test excavations carried out by Austral Archaeology within the footprint of the demolished building in 2016.</p> <p>A report prepared by Austral Archaeology documents the results of the archaeological monitoring carried out during the excavations for the reconstructions of Buildings P21 and P23. The report was submitted to the Heritage Council on 17 October 2018. No relics associated with Aboriginal people were recovered in the monitoring works. No archaeological material relating to the 1837 occupation of the Q Station by Buildings P51 and P52 were found during the monitoring of construction trenches at the P23 location. Structural archaeological evidence of the later occupation of the Q Station was identified and evident at both the P21 and P23 sites in the form of sandstone foundations and footings. Structural archaeological remains revealed and recorded in the monitoring works have been retained beneath the new building and will be permanently conserved.</p> | Compliant |
|     | <p>p) The final report shall include:</p> <ul style="list-style-type: none"> <li>• an executive summary;</li> <li>• due credit on the title page to the co-proponents paying for the excavation;</li> <li>• an accurate site location and site plan;</li> <li>• historical research, references, and bibliography;</li> <li>• detailed information on the excavation including the aim, the context for the excavation, procedures, analysis, treatment of artefacts (cleaning, conserving, sorting, cataloguing, labelling, scale drawings, photographs, repository);</li> <li>• nominated repository for the items;</li> <li>• detailed response to research questions; and</li> <li>• details of how this information about this excavation has been publicly disseminated.</li> </ul> <p>q) Should any Aboriginal relics be uncovered, or excavation or disturbance of the area occur, work is to stop immediately and the National Parks and Wildlife Service is to be informed in accordance with the <i>NPW Act 1974</i>.</p>   |  |   |           |



| Interpretation |  |  |   |               |
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| 100            | <p><b>Interpretation Plan</b></p> <p>Prior to the commencement of any new interpretive activities or educational tours on the site, the co-proponents shall submit a final <b>Interpretation Plan</b> to the DEC and the Heritage Council for approval. The Interpretation Plan must be prepared by a suitably qualified and experienced interpretive planner in accordance with the policies and objectives outlined in the QSCMP and DACMP. The plan must detail the approach to presenting the significance of the place and address the following matters:</p> <ol style="list-style-type: none"> <li>the interpretation objectives and principles for the site and the proposal;</li> <li>a targeted analysis of the significance of the place and the primary and secondary interpretation themes and messages for the site;</li> <li>identify the key target audiences for interpretation;</li> <li>identify the preferred options for delivery of interpretive programs (eg. signage, guided tours, publications, Internet, etc); and</li> <li>detail methods for monitoring and evaluating the implementation of the Plan.</li> </ol> | <p>Mawland, Interpretation Plan, 16/02/05</p> <p>Sydney Harbour National Park North Head Quarantine Station Conservation Management Plan Volume 1 - The Plan, April 2000</p> | <p>The Interpretation Plan was presented to the QSCCC on 16 December 2004 and approved by the Deputy Director-General Parks and Wildlife Division on behalf of DEC on 13 July 2005 and Heritage Council on 14 October 2005.</p> <p>The Interpretation Plan included the requirements of CoA 100 and had not been updated or reviewed since 2005.</p>  | Compliant     |
| 101            | <p>The <b>Interpretation Plan</b> shall also address the following site- specific matters:</p> <ol style="list-style-type: none"> <li>the provision of interpretive material in the proposed visitor centre (Buildings A14-17) that allows all visitors to the site to gain an understanding of the context, significance and history of the Quarantine Station;</li> <li>opportunities for the establishment of theme museums or displays across the Quarantine Station site;</li> <li>interpretation of the full length of the former Funicular route;</li> <li>interpretation of Buildings P17, A18 ,A24 and S6;</li> <li>interpretation of earlier landscape conditions (refer condition 90); and</li> <li>controlled tour access to the internal areas of accommodation buildings. This includes access to the Dining Room area in Building P5 when this room is not otherwise in use for function-based dining.</li> </ol>   | <p>Mawland, Interpretation Plan, 16/02/05</p>  | <p>The Interpretation Plan was noted to address the requirements of CoA 101 a) – f).</p>  | Compliant     |
| 102            | <p>All interpretive activities on the Quarantine Station shall be undertaken in accordance with the approved Interpretation Plan</p>   | <p>Mawland, Interpretation Plan, 16/02/05</p> <p><a href="http://www.qstation.com.au">www.qstation.com.au</a> [Accessed 27/01/22 @11:00am]</p>                               | <p>Broadly, activities were being conducted in accordance with the Interpretation Plan, i.e. ghost tours, special events and exhibitions; however, the name of the tours advertised at the time of the audit did not align with the plan.</p> <p>Refer to CoA 103 for further details.</p>  | Compliant     |
| 103            | <p>The co-proponents shall undertake a review of the <b>Interpretation Plan</b> every five years after the commencement date for the duration of the activity. The review shall be undertaken by a suitably qualified and experienced interpretive planner, in consultation with the Heritage Council. The review shall include, but not be limited to:</p> <ol style="list-style-type: none"> <li>the range of interpretive programs being offered at the Quarantine Station. This shall include a review of the content, methods of delivery and consideration of contemporary best practice in interpretation;</li> <li>consider relevant results of the visitor monitoring program and adaptive management responses;</li> <li>consider the provisions of any current endorsed conservation management plan for the site; and</li> <li>provide recommendations for any revisions to the Interpretation Plan.</li> </ol> <p>On the basis of the review the co-proponents shall, as necessary, prepare a revised Interpretation Plan to be submitted to the DEC for approval.</p>  | <p>Mawland, Interpretation Plan, 16/02/05</p> <p><a href="http://www.environment.nsw.gov.au">www.environment.nsw.gov.au</a></p>  | <p><b>The Interpretation Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since it was first approved in 2005.</b></p> <p><b>Review and update the Interpretation Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p> <p>Management plans were available at: <a href="https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans">https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans</a> at the time of the audit.</p> | Non-compliant |
| Infrastructure |  |  |   |               |
| 104            | <p><b>Further Approvals</b></p> <p>A separate application and approval under Part 5 of the <i>EP&amp;A Act 1979</i> and other relevant legislation will be required for any amplification of the existing water supply and sewerage system. This does not include on-site works identified for the upgrading of the fire hydrant system or the installation of water tanks in the area adjoining the Lower Reservoir.</p>  | <p>Auditee Interview 03/02/22</p>  | <p>No amplification of the existing water supply and sewerage system occurred during the audit period.</p>  | Not Triggered |

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| 105 | <p><b>Infrastructure Control Plan</b></p> <p>The co-proponents shall prepare a site-wide <b>Infrastructure Control Plan</b> to be submitted within 12 months of the commencement date. The plan shall be prepared in consultation with NSW Fisheries, Environment Protection Authority, Sydney Water, Energy Australia and other relevant authorities. With the exception of the matters detailed in condition 106) c), the plan shall be reviewed by the Heritage Advisor and submitted to DEC and the Heritage Council for approval.</p>   | <p>Mawland, Infrastructure Control Plan – Part 1, 28/02/08<br/><i>Outdoor Visitor Infrastructure Plan</i></p> | <p>This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified and was therefore not assessed as part of this audit.</p> <p>The Infrastructure Control Plan – Part 1 was approved by the DECC on 5 November 2008.</p>  | Not Triggered |
| 106 | <p>The plan shall address, but not be limited to, the following:</p> <ol style="list-style-type: none"> <li>an assessment of the location, current capacity and condition of the water supply and sewerage system;</li> <li>an assessment of the current condition of the internal roads;</li> <li>minimum design standards for internal roads, including the location and design principles for all proposed road infrastructure, including road surfaces, edges, speed humps and signs. These shall take into account all relevant industry standards and codes, as well as the historic heritage value of the roads. Notwithstanding the provisions of condition 105) or condition 112), within 6 months of the commencement date the co-proponents shall submit for approval of the DEC sufficient information regarding the minimum design standards to enable compliance with conditions 145)-146) and 148);</li> <li>provide a scaled map and GIS data layer (condition 66) showing the location and route of all water, sewerage, stormwater, power, telecommunications, roads and any related infrastructure across the site, both existing and disused services. It shall identify materials and likely period of installation, and be linked to a list of upgrade specifications for each infrastructure component;</li> <li>provide a schedule and map indicating the location of all significant services to be retained and conserved, as per the requirements of the DACMP;</li> <li>a schedule of repair and maintenance works and new works proposed including a prioritisation of works and timeframes. Priority should be given to the identification of any works needed to upgrade or replace the fire hydrant system. The principle of common trenching of services should be adopted for all new works proposed;</li> <li>identify strategies to improve stormwater management, including: <ul style="list-style-type: none"> <li>opportunities for reducing stormwater discharge from the site, including options for redirecting stormwater discharge away from Quarantine Beach</li> <li>an assessment of works required to secure the stormwater outlet at Quarantine Beach to minimise public safety risk</li> <li>assess the need to install a flow dissipator into the stormwater outlet at Quarantine Beach. Any design shall be developed in consultation with NSW Fisheries and must not inhibit fish passage</li> <li>assess the need to install gross pollutant traps at or near stormwater discharge outlet/s and car-parks;</li> </ul> </li> <li>a monitoring program to allow an on-going assessment of the consumption and capacity of the water supply and sewerage systems. This shall include the identification of triggers for</li> <li>system upgrades; and</li> <li>an emergency strategy for utility infrastructure failures or malfunctions, to include sewerage system overloads and overflows, power failures and water supply.</li> </ol> | <p>Mawland, Infrastructure Control Plan – Part 1, 28/02/08<br/><i>Outdoor Visitor Infrastructure Plan</i></p> | <p>The requirements of CoA 106 are addressed as follows:</p> <ol style="list-style-type: none"> <li>Addressed in Sections 2, 4 and 4. Figure 2.1 and Appendix B for location of water supply. Figure 4.1 for location of sewage system.</li> <li>Addressed in Section 8.</li> <li>Addressed in Section 8 for roads and speed humps and Section 19 for signs.</li> <li>Materials and upgrade specification are addressed in each section. Refer to CoA 66 concerning the GIS.</li> <li>Addressed in Figure 2.1.</li> <li>Addressed in Section 5 and Figure 5.3.</li> <li>Addressed in Sections 2, 4 and 5.</li> <li>Sections 2.4, 3.4, 4.5, 5.4, 6.4 and 7.4</li> </ol> | Compliant     |
| 107 | <p>All infrastructure maintenance and upgrade works, excluding minor maintenance repairs or works (as defined) and priority traffic calming measures (conditions 145)-146), shall be undertaken in accordance with the adopted <b>Infrastructure Control Plan</b>.</p>   | <p>Site Inspection</p>  | <p>Infrastructure maintenance and upgrade works appeared to have been conducted in accordance with the Infrastructure Control Plan during the audit period.</p>  | Compliant     |
| 108 | <p>All investigative techniques employed in preparing the <b>Infrastructure Control Plan</b> shall be non-destructive and non-polluting (as defined) and comply with the relevant industry guidelines and standards. Approval from the DEC and other relevant authorities will be required for any techniques that will or may have an environmental impact.</p>   | <p>Mawland, Infrastructure Control Plan – Part 1, 28/02/08<br/><i>Outdoor Visitor Infrastructure Plan</i></p> | <p>This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified and was therefore not assessed as part of this audit.</p>   | Not Triggered |
| 109 | <p>The co-proponents shall undertake a review of the <b>Infrastructure Control Plan</b> every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with those agencies listed in condition 105) above, relevant public authorities and infrastructure providers. On the basis of the review the co-proponents shall, as necessary, prepare a revised Infrastructure Control Plan to be submitted to the DEC for approval.</p>   | <p>Mawland, Infrastructure Control Plan – Part 1, 28/02/08<br/><i>Outdoor Visitor Infrastructure Plan</i></p> | <p><b>The Infrastructure Control Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since February 2008.</b></p> <p><b>Review and update the Infrastructure Control Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p>   | Non-compliant |

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| 110 | <p><b>Work Sites</b></p> <p>Any works requiring the excavation or trenching of areas shall be staged so that the extent of excavation or trenching does not exceed 50 metres at any one time. Any such works shall also be undertaken in accordance with condition 159)</p>  | <p>Auditee Interview 03/02/22</p> <p>Site Inspection</p>  | <p>Excavations were undertaken for the reconstruction of Building P21 and P23. These works were supervised by Austral Archaeology under a S60 approval.</p> <p>No excavation of trenching was observed during the site inspection.</p>  | Compliant     |
| 111 | <p><b>Asbestos and Rainwater System</b></p> <p>The co-proponents shall 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 strategy shall be reviewed by the Heritage Advisor and submitted to the DEC and the Heritage Council for approval.</p> <p>The strategy shall include a prioritised schedule of replacement works, to be incorporated into the Conservation Works Program (condition 78).</p>  | <p>Conservation Works Program – Stage 1, June 2006</p> <p>Asbestos Register 2020</p>  | <p><b>Observation</b></p> <p><b>The Asbestos Cement Sampling Strategy is included in the Conservation Works Program has not been updated since March 2006. The Declaration and Approval page of the of the Conservation Works Program - Stage 1 was not signed indicating that had not been approved by the Heritage Council and DEC.</b></p> <p>Asbestos cement roof sheeting was observed on various buildings during the site inspection. An Excel based asbestos register was available for review.</p> <p>Refer to CoA 78 for further details.</p> | Compliant     |
| 112 | <p><b>Outdoor Visitor Infrastructure</b></p> <p>The co-proponents shall prepare a site-wide-plan for outdoor visitor infrastructure prior to the installation of any outdoor visitor infrastructure. The plan shall be reviewed by the Heritage Advisor and submitted to the DEC and the Heritage Council for approval. The plan shall demonstrate consistency with other relevant site-wide plans such as the Interpretation Plan and Heritage Landscape Master Plan, and address, but not be limited to:</p> <p>e) the proposed location, design and materials of the external lighting system, to include any emergency lighting. Lighting should have regard to the following principles:</p> <ul style="list-style-type: none"> <li>• the avoidance of light spill in areas of high-use Longnosed Bandicoot foraging habitat (as identified in Illustration 15 of the DACMP or the revised habitat assessment – condition 165) and Little Penguin habitat43</li> <li>• the use of lights in the red-orange spectral range in the Wharf Precinct</li> <li>• minimising light spill across the site and outside of the site</li> </ul> <p>f) the proposed location and design of waste receptacles, including fauna-proof bins;</p> <p>g) the proposed location, design and materials for signage, to include proposed text, style, graphics, and colours;</p> <p>h) a consideration of the environmental impacts of the specific locations and methods of installation for each element of outdoor visitor infrastructure; and</p> <p>i) compliance with relevant industry guidelines, codes, Australian Standards and the Building Code of Australia (BCA).</p> | <p>Mawland, Infrastructure Control Plan – Part 1, 28/02/08</p> <p><i>Outdoor Visitor Infrastructure Plan</i></p>  | <p><b>Observation</b></p> <p><b>The Outdoor Visitor Infrastructure Plan has not been updated since February 2008.</b></p> <p><b>Review and update the Outdoor Visitor Infrastructure Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p> <p>The Outdoor Visitor Infrastructure Plan is incorporated into the Infrastructure Control Plan – Part 1 which was approved by the DECC on 5 November 2008.</p>            | Not Triggered |
| 113 | <p>Prior to the commencement of any works associated with the installation of outdoor lighting, a sample of the proposed lighting of both general outdoor areas and any emergency lighting must be completed in consultation with the Heritage Council and approved by the DEC.</p>  | <p>Site Inspection</p>  | <p>No lighting was installed during the audit period.</p>   | Not Triggered |
| 114 | <p>The use of laser or neon lighting (with the exception of emergency lighting), food or beverage vending machines, and commercial advertising signage on the site is not permitted.</p>   | <p>Site Inspection</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p><b>Two vending machines were installed in 2019 at the request of guests for snacks and drinks when food and drink services are not available. Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland states that the vending machines were removed on 17 February 2022.</b></p> <p>Only one vending machine was observed during the site inspection. Refer to photograph in Appendix F.</p>   | Non-compliant |
| 115 | <p>All outdoor visitor infrastructure works shall be undertaken in accordance with the adopted plan and an approved Precinct Plan.</p>   | <p>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006</p> <p><i>Heritage Landscape Masterplan</i></p> <p><i>Inscriptions Conservation Management Plan</i></p>  | <p>No infrastructure works were conducted during the audit period.</p>  | Not Triggered |



| Security             |   |   |   |               |
|----------------------|---|---|---|---------------|
| 116                  | <p><b>Security System</b></p> <p>The co-proponents shall prepare a whole-of-site <b>Security Plan</b> in consultation with the NSW Police, to be submitted within 12 months of the commencement date. The plan shall be reviewed by the Heritage Advisor and submitted to the DEC for approval. Implementation of the plan must commence within three months of the date of its approval.</p> <p>The plan shall address, but not be limited to:</p> <ol style="list-style-type: none"> <li>the DACMP subsidiary policies 16.7.1 – 17.7.6 with respect to locks and hardware across the site;</li> <li>a master-key system across the site that enables a consistent approach to keying;</li> <li>a monitored alarm system for buildings containing collections, that are periodically used for interpretation or that are remote and difficult to monitor, and security measures for all other buildings (eg. those in daily use);</li> <li>enforcement powers under the NPW Act and protocols for dealing with breaches of the Act;</li> <li>reporting structure and protocols for dealing with security incidents, to include communication protocols with DEC and the NSW Police; and</li> <li>the need for security personnel on site.</li> </ol>   | <p>Mawland, Visitor Management Plan, March 2005</p> <p><i>Visitor Access Strategy</i><br/><i>Security Plan</i><br/><i>Emergency Evacuation Plan</i></p> | <p>Sighted the Visitor Management Plan dated March 2005 that also included the Visitor Access Strategy, Security Plan and Emergency and Evacuation Plan. The Visitor Management Plan was approved by the Department on 10 August 2005 (p.5).</p>  | Compliant     |
| 117                  | <p>The co-proponents shall undertake a review of the <b>Security Plan</b> every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with the NSW Police. On the basis of the review the co-proponents shall, as necessary, prepare a revised Security Plan to be submitted to the DEC for approval.</p>   | <p>Mawland, Visitor Management Plan, March 2005</p> <p><i>Visitor Access Strategy</i><br/><i>Security Plan</i><br/><i>Emergency Evacuation Plan</i></p> | <p><b>The Security Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since March 2005.</b></p> <p><b>Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p>          | Non-compliant |
| Transport and Access |   |   |   |               |
| 118                  | <p><b>Access Strategy</b></p> <p>The co-proponents shall prepare and submit a final <b>Access Strategy</b> for the site to the DEC and DIPNR for approval within 6 months of the commencement date. The strategy shall be prepared in consultation with the Heritage Council, Manly Council and the State Transit Authority. Once approved, the co-proponents shall implement the Access Strategy.</p> <p>The final Access Strategy must address but not be limited to:</p> <ol style="list-style-type: none"> <li>all available means of access to the site, including details of the ferry service and shuttle bus operation (including operating times, pick up/set down points, etc) (conditions 138)-142) and 155);</li> <li>access provisions within the site, including constraints and management strategies, details of service vehicles, bus and taxi access. Specific consideration shall also be given to access arrangements for the Second Cemetery (condition 124);</li> <li>access provisions to the wharf, including the arrival and departure routes for the ferry. These routes shall generally be in accordance with Figure 11.2 in the EIS. The co-proponents shall consult with NSW Fisheries regarding this matter<sup>44</sup>;</li> <li>measures to promote public transport and reduce private vehicle access to the site;</li> <li>measures to be implemented to prevent additional visitors entering the site once visitor capacities, as specified in condition 120), have been reached;</li> <li>measures to ensure that a reasonable proportion of visitors in any one day include day visitors that arrived without prebooking a tour or other activity;</li> <li>measures to provide for disabled, concession and non-English speaking access to the site and to enable participation in site activities;</li> <li>the provision of disabled access to every precinct. This component of the Access Strategy shall be prepared in accordance with the requirements of the Disability Discrimination Act and any guidelines or standards established under the Act; and i) the visitor monitoring program (condition 156).</li> </ol> | <p>Mawland, Visitor Management Plan, March 2005</p> <p><i>Visitor Access Strategy</i><br/><i>Security Plan</i><br/><i>Emergency Evacuation Plan</i></p> | <p>This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified.</p> <p>The Visitor Management Plan dated March 2005 was available for review that also included the Visitor Access Strategy, Security Plan and Emergency and Evacuation Plan. The Visitor Management Plan was approved by the Department on 10 August 2005 (p.5).</p> | Compliant     |

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| 119  | <p>The co-proponents shall undertake a review of the <b>Access Strategy</b> every five years after the commencement date for the duration of the activity. The review shall be undertaken in consultation with the Heritage Council, Manly Council and the State Transit Authority. On the basis of the review the co-proponents shall, as necessary, prepare a revised Access Strategy to be submitted to the DEC and DIPNR for approval.</p>  | <p>Mawland, Visitor Management Plan, March 2005<br/><i>Visitor Access Strategy</i><br/><i>Security Plan</i><br/><i>Emergency Evacuation Plan</i></p>                    | <p><b>The [Visitor] Access Strategy had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since March 2005.</b></p> <p><b>Review and update the [Visitor] Access Strategy where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p>   | Non-compliant |
| 120  | <p><b>Site Visitor Capacity</b><br/>Variation to the site and site visitor numbers must be in accordance with the following:</p> <ul style="list-style-type: none"> <li>a) the optimum visitor capacity of the site is 315 people (including staff) at any one time. The co-proponents shall take all reasonable steps to ensure that the optimum visitor capacity (or less) is met for a majority of the time during which the site is publicly accessible;</li> <li>b) the maximum visitor capacity may be increased to 600 people (including staff) for up to 6 hours on up to 20 occasions per calendar year. Arrival and departure from these events must be distributed throughout the day period and these events must be held in accordance with the requirements of term 128 b) of the approval,</li> <li>c) evening and night time events and functions are to avoid high value bandicoot foraging habitat. Identification of high value bandicoot foraging habitat is to be determined by NPWS; and</li> <li>d) access to the Wharf and Quarantine Beach is to be prohibited during evening and night time events and functions. This does not preclude normal operations undertaken as part of the restaurant in Building A6, including the outdoor eating area.</li> </ul> <p><i>Note: Normal operations includes the day-to-day activities of the site and transportation to and from the site. Events and functions include any event or function conducted within the site that is separately advertised by either of the co-proponents or held by invite and attended by people not guests of the hotel.</i></p> | Auditee Interview 03/02/22  | <p>Mawland management reported that daily site visitor numbers are calculated by accommodation, dining, tours and conferences bookings. This is recorded daily in a document referred to as a 'Night Audit'.</p> <p>Mawland management reported that it is not possible to determine the visitor numbers for walk-ins or cyclist, i.e. general public access as these visitors typically walk around the boom gate and do not report to Reception.</p> <p>During COVID-19 restrictions site visitor numbers were substantially below the capacity threshold.</p> <p>The Sales / Event Department manage this requirement when booking in events taking advice from the NPWS Ranger when necessary.</p> <p>There were no instances in the audit period where capacity was exceeded or increased to 600 people. Access to the Beach and the Wharf is restricted by closure of the beach and wharf gates at sunset. The key is held by the General Manager and the Duty Manger in case of emergency.</p> | Compliant     |
| 120A | <p><b>A Site Travel and Access Plan</b> must be prepared by a suitably qualified consultant, to the Satisfaction of the Secretary, that details management measures to be implemented, at a minimum, for at least 5 event sizes, including those presented in Term 120, and is to include detail of the following:</p> <ul style="list-style-type: none"> <li>a) mode share targets and measures of how these will be implemented, monitored and achieved including details of the financial and human resources required to implement targets;</li> <li>b) anticipated number and types of vehicles arriving at the site and car parking provisions for both staff and visitors;</li> <li>c) the management of the site car park (i.e. car park wardens/traffic controllers) and management measures to ensure site visitors do not impact upon the parking provisions of North Head;</li> <li>d) detail of arrival and departure times and detail of how impacts of this upon existing traffic flows at North Head will be mitigated; and</li> <li>e) a map clearly delineating site access and parking provisions for various sized events of up to 600 people.</li> </ul> <p>The co-proponents must not hold more than 450 people on site until the <b>Site Travel and Access Plan</b> is approved by the Secretary.</p> <p>The <b>Site Travel and Access Plan</b> must be implemented by the co-proponents for the duration of the Lease agreement.</p>  | <p>GTA Consultants, Travel and Access Plan, 06/08/18, Ref: N126511</p> <p>Letter – DPIE to Mawland, Approval of Public Open Day Event (15 September 2019), 30/08/19</p> | <p>A Site Travel and Access Plan dated 6 August 2018 was available for review.</p> <p>Sighted a letter from the Department dated 30 August 2019 confirming it had received the Site Travel and Access Plan on 27 August 2019. Mawland management reported that the Site Travel and Access Plan has not been approved by the Department as there has not been an event with greater than 450 people.</p>   | Compliant     |
| 121  | <p>Any proposal to increase the site capacity or the optimum visitor capacity <del>after this time</del> must be publicly exhibited and submitted for the approval of the DEC and DIPNR. The proposal must be accompanied by a clear assessment of the potential impacts of any increase on the significance of the Quarantine Station and justification based on the results of the visitor and site monitoring programs.</p>  | Auditee Interview 03/02/22  | <p>Mawland management reported that there was no proposal to increase the site capacity or the optimum visitor capacity during the audit period.</p> <p>The most recent proposal to increase site capacity was part of Modification 3 (MP08_0041 MOD 03) which approved by the Department on 25 May 2018.</p>   | Not Triggered |

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| 122 | <p><b>Pricing</b></p> <p>The co-proponents shall ensure that all services and facilities at the site are made available at varying price-scales, commensurate with the standard of service to be provided, to facilitate choice and encourage equitable community access to the site. This shall include, but not be limited to, accommodation, tours, interpretive activities and educational facilities.</p>   | <p><a href="http://www.qstation.com.au">www.qstation.com.au</a> [Accessed 11/01/22 @10:05am]</p>  | <p>Tours can be booked online via the Q Station website. Prices marked as follows for a select sample of events:</p> <ul style="list-style-type: none"> <li>• Quarantine Wander: \$20 adult / \$10 child / \$18 concession.</li> <li>• Ghostly Encounters: \$55 adult / \$49 concession.</li> <li>• Wedding Packages: <ul style="list-style-type: none"> <li>○ Outdoor Ceremony: \$2,000.</li> <li>○ Reception Package: \$169pp.</li> <li>○ Cocktail Reception Package: \$169pp.</li> </ul> </li> <li>• Meetings and Events: <ul style="list-style-type: none"> <li>○ Day Delegate Packages: Full Day = \$82pp / Half Day = \$75pp.</li> </ul> </li> <li>• Educational Events: <ul style="list-style-type: none"> <li>○ Zoom into Quarantine: \$225 per class of up to 30 students.</li> <li>○ Historical Detectives: &amp;18.50 per student.</li> <li>○ Mindful Explorers: \$18.50 per student.</li> <li>○ Suitcase Stories: 18.50 per student.</li> </ul> </li> <li>• Les Sculptures Refusées: Free (inc parking).</li> <li>• Sunday Sessions at Q: \$12.00 per adult including 1 free house beer, wine or soft drink / \$5.00 per teen 12-17 yrs including 1 free soft drink / Free for children under 11 yrs.</li> <li>• Wildlife Meanders Tour: Adult - \$39 (17+) / Concession - \$30 / Child - \$15 (7 to 16).</li> <li>• A Menu for the Boilerhouse Kitchen and &amp; Bar and a Kids Menu were available online showing the price of meals and beverages.</li> </ul> <p>Accommodation rates were available via the online booking system.</p> | Compliant     |
| 123 | Concessional pricing shall be provided for all tours and interpretive activities at the site.  | <p><a href="http://www.qstation.com.au">www.qstation.com.au</a> [Accessed 11/01/22 @10:05am]</p>  | Refer to CoA 122  | Compliant     |
| 124 | <p><b>Access to the Second Cemetery</b></p> <p>Based on the options identified in the <b>Heritage Landscape Master Plan</b> [condition 92 i)] suitable arrangements for providing managed access to the Second Cemetery shall be provided within 18 months of the commencement date. If measures for managed access have not been implemented after 18 months, regular public access to this area shall cease until such arrangements are in place. In the meantime, access to the Second Cemetery shall be limited to one tour group of up to 25 persons at any one time.</p> <p>If any adverse impacts are identified prior to the access system being implemented, measures to reduce such impacts shall be introduced following consultation with the DEC.</p> | <p>Mawland, Interpretation Plan, 16/02/05</p> <p>Mawland, Visitor Management Plan, March 2005</p> <p>Visitor Access Strategy</p> <p>Security Plan</p> <p>Emergency Evacuation Plan</p> <p>Site Inspection</p> | <p>This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified and was therefore not assessed as part of this audit.</p> <p>The Interpretation Plan states that “Access to the Second Cemetery will be conducted in accordance with the policies set out in the Visitor Management Plan, with which this Interpretation Plan is congruent”.</p>   | Not Triggered |
| 125 | <p><b>Special Events, Functions and Free Open Days</b></p> <p>The number of special events or activities requiring overflow parking shall be limited to 6 per year. Special events include uses (e.g. re-enactments, festivals, etc) and public open days that are not part of the normal operations (e.g. tours) and extend beyond those function, conference, accommodation and restaurant uses identified in the PAR.</p>   | <p>Mawland, Interpretation Plan, 16/02/05</p>   | <ul style="list-style-type: none"> <li>• 2021 – No events required overflow parking.</li> <li>• 2020 – No events required overflow parking.</li> <li>• 2019 -Two events, Open Days on 28 April 2019 (238 people) and 15 September 2019 (315 people).</li> <li>• 2018 – Two events. Invictus Games Event 19 October 2018 (400 people plus volunteers). Boxing Day 26 December 2018 (100 people).</li> </ul>  | Compliant     |

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| 126 | <p>At least two free public open days are to be held at the site every year. The open days shall be held on either a weekend or public holiday. They shall include opportunities for people to participate in organised tours and interpretive activities that promote an understanding of the site's values, at no cost. Tours and activities may also be provided that outline the methods of conservation and management being used at the site, also at no cost. A booking system may be used to ensure that the site capacity limits in condition 120) are not exceeded.</p>  | <p>Auditee Interview 03/02/22<br/>Mawland, Interpretation Plan, 16/02/05<br/>Mawland, Visitor Management Plan, March 2005<br/><i>Visitor Access Strategy</i><br/><i>Security Plan</i><br/><i>Emergency Evacuation Plan</i><br/>Email – DPIE to Mawland, QStation Open Day 2020, 29/09/20 @10:20hrs<br/>Letter – DPIE to Mawland, Approval of Public Open Day Event (15 September 2019), 30/08/19</p> | <p>Free public open days were held on the following dates during the audit period:</p> <ul style="list-style-type: none"> <li>• 2021: No events in early 2021 due to COVID-19. Late 2021 was the Les Sculptures Refusees exhibition.</li> <li>• 2020: With the approval of the Department the 2020 Open Days were held as part of the Les Sculptures Refusees exhibition (15 Oct – 17 Nov 2020), with activities conducted outdoors due to COVID-19. Sighted an email from the Department to Mawland dated 29 September 2020 acknowledging that the Department did not have an objection to Mawland's request to host a free event in lieu of the tradition Open Day. The letter noted this applied to 2020 only.</li> <li>• 2019: One event on 28 April 2019 titled Spanish Flu. One event on 15 September 2019 titled Living in Quarantine. Sighted a letter from the Department to Mawland dated 30 August 2019 confirming the Department approved the Open Day for 15 September 2019.</li> <li>• 2018: Spanish Flu in May 2018 and Return from WW1 in September 2018.</li> </ul> <p>Given it is an offence to not comply with a Public Health Order this CoA was found to be compliant during the audit period where there was no Public Health Order in place.</p> | Compliant     |
| 127 | <p>Special event and public open day proposals are to be submitted to the DEC for approval. The co-proponents shall also consult with the Quarantine Station Community Committee and Manly Council prior to submission to the DEC. Proposals may only proceed if the DEC is satisfied that:</p> <ol style="list-style-type: none"> <li>sufficient traffic and car-parking and pedestrian management measures will be provided (both on and off-site);</li> <li>noise and light impacts will be minimised; and</li> <li>that the proposal will promote or enhance the interpretation of the place.</li> </ol> <p>The DEC may direct the co-proponents to undertake all practicable steps to address the above matters and to ensure that the minimum number of public open days are provided in accordance with condition 126).</p> | <p>QSCCC Minutes, 10/11/21, Ref: DOC21/1014227, Draft<br/>DPIE to Mawland, Approval of the Public Open Day Event (28 April 2019), 04/04/19<br/>Letter – DPIE to Mawland, Approval of Public Open Day Event (15 September 2019), 30/08/19<br/>Auditee response on draft audit report, 08/02/22<br/>Email DPE to Mawland, 14/02/22</p>   | <p>On 14/02/22 Department of Planning and Environment's Joanna Bakapanos had provided written advice that special event and public open day proposals are to be approved by NPWS.</p> <p>Draft meeting minutes from a QSCCC meeting held on 10 November 2021 noted that Mawland had written to the Department informing them that the Q Station is open for the Les Sculptures Refusees exhibition. It is noted that the Department recognized the sculptures exhibition as Open Days; however, evidence of this was not available to the Auditor.</p> <p>Sighted a letter from the Department to Mawland dated 30 August 2019 confirming the Department had received a proposal on 27 August 2019f or the 15 September 2019 Open Day.</p> <p>Sighted a letter from the Department to Mawland dated 4 April 2019 confirming the Department had received a Public Open Day Event Proposal on 28 April 2018 and approving the Open Day on 28 April 2019.</p>  | Compliant     |
| 128 | <p>Any special events or functions held after sunset shall:</p> <ol style="list-style-type: none"> <li>if they are to be held outdoors, be located away from the areas identified as high-use Long-nosed Bandicoot foraging habitat in the DACMP (Illustration 15) or the revised habitat assessment (condition 165);<sup>45</sup> or</li> <li>if they are to be held in the Wharf Precinct, must be held indoors. This does not preclude normal operations undertaken as part of the restaurant in building A6, including the outdoor eating area.</li> </ol> <p><sup>45</sup> Incorporates a condition of concurrence, as granted by the Minister for the Environment under the EP&amp;A Act 1979</p>  | <p>Mawland, Visitor Management Plan, March 2005<br/><i>Visitor Access Strategy</i><br/><i>Security Plan</i><br/><i>Emergency Evacuation Plan</i><br/>Complaints Register Current to 2021<br/>Incident Register Current to 2021</p>   | <p>Further policies to this effect are part of the Visitor Management Plan, and interpretive activities will be carried out in accordance with these policies.</p> <p>No outdoor activities in the Wharf precinct were reported during the audit period after sunset except for activities at the Boilerhouse.</p> <p>No complaints were reported during the audit period concerning sunset events or functions. On this basis the Q Station was considered to be compliant with the CoA.</p>   | Compliant     |
| 129 | <p><b>Night Tours</b><br/>For 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. After this time any proposal to increase night tour capacities must be submitted for the approval of the DEC. The proposal must be accompanied by a clear assessment of the potential impacts of any increase on the significance of the Quarantine Station and justification based on the results of the visitor and site monitoring programs (particularly monitoring Long-nosed Bandicoot foraging activity).<sup>4</sup></p>   | <p>Auditee Interview 03/02/22</p>  | <p>This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified and was therefore not assessed as part of this audit.</p> <p>Policies with regard to night tours form part of the Visitor Management Plan. The Interpretation Plan aligns with those policies in that night tours proposed in Section 4.2.</p>   | Not Triggered |



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| 130 | Night tours are to be undertaken on formed roads, paths or the Funicular stairway, unless part of an approved special interest tour.   | Mawland, Visitor Management Plan, March 2005<br><i>Visitor Access Strategy</i><br><i>Security Plan</i><br><i>Emergency Evacuation Plan</i><br>Mawland, Interpretation Plan, 16/02/052005   | No night tours are conducted on any part of the Q Station except for formed roads and paths. Policies with regard to night tours form part of the Visitor Management Plan. The Interpretation Plan aligns with those policies in that night tours proposed in Section 4.2.   | Compliant     |
| 131 | Unless approved as part of a special interest tour, measures are to be taken to ensure that night tour patrons do not use spotlights or flash-photography in outdoor areas (with the exception of the lanterns or torches used as part of the ghost tours).  | Site Inspection<br>Mawland, Visitor Management Plan, March 2005<br><i>Visitor Access Strategy</i><br><i>Security Plan</i><br><i>Emergency Evacuation Plan</i><br>Mawland, Interpretation Plan, 16/02/052005<br>Complaints Register Current to 2021 | A safety briefing is given at the start of each tour. This covers personal safety, photography, directions and alcohol testing of patrons on night-time tours.<br><br>Map Information boards were observed to include infographics of a Minimal Impact Code. The Minimal Impact Code is a set of eight guidelines designed to influence behaviour, equipment and services so that they cause little to no impact on their immediate physical and social environment. The Minimal Impact Code requires 'No flash photography near grassy area of bush land' and includes a graphic of a Little Penguin. | Compliant     |
| 132 | At the conclusion of any night tours on site, arrangements are to be made to transport visitors in an orderly manner from the conclusion point of the tour to the:<br>a) accommodation area (for those visitors staying on site overnight);<br>b) relevant car park (for those visitors departing by car or bus); or<br>c) to the Wharf Precinct (for access to the ferry). This may include, but is not limited to, the use of a shuttle bus or groups led by a guide.  | Mawland, Visitor Management Plan, March 2005<br><i>Visitor Access Strategy</i><br><i>Security Plan</i><br><i>Emergency Evacuation Plan</i><br>Mawland, Interpretation Plan, 16/02/052005   | Night-time tours end at the Wharf Precinct where patrons are taken to the carpark, the public bus stop in a shuttle bus or at the reception area in CP1. No ferries visit the Q Station after dark.  | Compliant     |
| 133 | Notwithstanding the provisions of condition 129), the DEC may at any time direct that night tour numbers are reduced, and/or other appropriate measures implemented, if it is satisfied on the basis of monitoring programs that night tours are having adverse impacts on the Long-nosed Bandicoot population. The co-proponents shall comply with any such directions issued by the DEC.   | Auditee Interview 03/02/22   | No directions were made by the Department during the audit period.   | Not Triggered |
| 134 | <b>Special Interest Tours</b><br>No special interest tours may be run without the approval of the DEC (this may be undertaken as part an application for a tour operators license under the <i>NPW Act</i> ). This will include tours to Store Beach, Cannae Point or other areas of the site (including bushland areas, rocky foreshores, Old Mans Hat and the cemeteries). This excludes the four main tours <sup>47</sup> proposed by the co-proponents in the PAS. In seeking approval for special interest tours, the following information shall be provided to DEC:<br>a) proposed frequency and size of tours;<br>b) compliance with the Access Strategy and Interpretation Plan (conditions 118) 100);<br>c) details of the tour activities and route, including buildings and other features to be visited; and<br>d) a statement identifying and addressing any potential environmental issues that may arise, including management of visitor safety, and measures to address these.<br><sup>47</sup> i.e..the Ghost tours, 1918 Night Experience, Quarantine Explorer and Being Quarantined | Auditee Interview 03/02/22<br>Mawland, Visitor Management Plan, March 2005<br><i>Visitor Access Strategy</i><br><i>Security Plan</i><br><i>Emergency Evacuation Plan</i>   | A small number of Indigenous tours and Federation Wildflower tours were conducted during the audit period.<br><br>The Visitor Management Plan and Integrated Monitoring and Adaptive Management System gives further detail regarding Special interest tours.  | Not Triggered |
| 135 | The co-proponents shall ensure that any approved special interest tours are subject to a specific monitoring and review program to enable assessment of potential visitor impacts.   | Auditee Interview 03/02/22   | No special interest tours were run during the audit period.  | Not Triggered |

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| 136 | <p><b>School and Educational Programs</b></p> <p>Provision shall be made for school groups to have access to the site without the need to stay overnight.</p>  | <p>Mawland, Visitor Management Plan, March 2005<br/> <i>Visitor Access Strategy</i><br/> <i>Security Plan</i><br/> <i>Emergency Evacuation Plan</i></p> <p>Mawland, Interpretation Plan, 16/02/05</p> <p>Tour Attendance Records</p>  | <p>School groups visit the Q Station during the school term. Typically, there are approximately 30 – 60 students per excursion which are divided into groups of 10 – 20 dependent on the schools request. There are approximately three excursions per week. A pre-excursion briefing from the guides is provided prior to the tour and groups are supervised at all times.</p> <p>School groups can book tours without the requirement for overnight accommodation. Total numbers for educational programs during the audit period are provided below:</p> <ul style="list-style-type: none"> <li>July 2021 – December 2021 = 78 (Note that this period was impacted by COVID restrictions)</li> <li>June 2020 – July 2021 = 4,178 (Note that this period was impacted by COVID restrictions)</li> <li>July 2019 – June 2020 = 5,021 (Note that this period was impacted by COVID restrictions)</li> <li>July 2018 – June 2019 = 6,837</li> </ul>  | Compliant     |
| 137 | <p>Overnight educational programs must ensure a high-level of student supervision to prevent uncontrolled night activities or access across the site. Students must also be supervised during any periods of student "free-time" during the day and confined to distinct areas of the site, that is there is to be no general or uncontrolled access across the site.</p>  | <p>Mawland, Visitor Management Plan, March 2005<br/> <i>Visitor Access Strategy</i><br/> <i>Security Plan</i><br/> <i>Emergency Evacuation Plan</i></p> <p>Auditee Interview 03/02/22</p> <p>Complaints Register Current to 2021</p> <p>Incident Register Current to 2021</p>   | <p>No overnight tours were conducted during the audit period for security reasons.</p>  | Not Triggered |
| 138 | <p><b>Water-based Access</b></p> <p>The ferry service between Manly and the Quarantine Station site shall:</p> <ol style="list-style-type: none"> <li>commence within 6 months of the commencement date or, if this cannot be achieved due to circumstances beyond the reasonable control of the co-proponents, within such other time as the DEC may approve;</li> <li>generally arrive and depart between the hours of 9:00 am and 11:00 pm respectively;</li> <li>be limited to a maximum of one movement<sup>48</sup> per hour, after sunset, between July and February inclusive, to reduce the potential for impacts on the Little Penguin population. A maximum of 20 movements in one day may occur at other times to encourage water-based access to the site;<sup>49</sup> and</li> <li>with the exception of extreme weather events and maintenance periods, be provided on an hourly basis during the peak periods of visitor activity.</li> </ol> <p><sup>48</sup> one "movement" is defined as the arrival and departure of a ferry</p> <p><sup>49</sup> incorporates a condition of concurrence, as granted by the Minister for the Environment under the EP&amp;A Act 1979</p> | <p>Auditee Interview 03/02/22</p> <p><a href="http://www.qstation.com.au">www.qstation.com.au</a></p> <p>Complaints Register Current to 2021</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>North Head Stakeholder Group Meeting Minutes – 02/12/20</p> | <p>Mawland management reported that there was no ferry service in 2021 as the operator made the decision to suspend the service due to the COVID-19 pandemic and imposed health restrictions. Mawland management reported that negotiations are ongoing concerning resuming the service and that the QSCCC had also requested the service prover to resume the service.</p> <p>The My Fast Ferry was not operating at the time of the audit due to COVID-19 restrictions.</p> <p>Information concerning the ferry service was available on the Q Station website including links to the My Fast Ferry timetable. Tickets [when operational] are able to be ordered online.</p> <p>The Auditor was unable to confirm if, when operational during the audit period, that the ferry generally arrived and departed between 9:00am and 11:00pm and was limited to a maximum of one movement per hour after sunset between July and February.</p> <p>Given the decision to suspend the ferry service due to COVID-19 restrictions was made by the service operator and not the co-proponents and that the service was operating prior to the COVID-19 pandemic this CoA was found to be compliant.</p> | Complaint     |
| 139 | <p>The co-proponents shall undertake all practicable measures to ensure that:</p> <ol style="list-style-type: none"> <li>within 3 years of the commencement date, the proportion of visitors accessing the site by the ferry is 40% or greater; and</li> <li>within 5 years of the commencement date, the proportion of visitors accessing the site by ferry is between 40% - 50% and stays at this level, or greater, for the life of the project.</li> </ol>   | <p>Auditee Interview 03/02/22</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p>   | <p>Observation: The 2020 Annual Environmental Report states that "Less than 40% of arrivals use the ferry system. Most guests arrive by car, public bus or walk from manly".</p> <p>Information concerning the ferry service was available on the Q Station website including links to the My Fast Ferry timetable. Tickets [when operational] are able to be ordered online.</p> <p>Mawland management reported that they had approval from NPWS to implement paid parking at CP1 to discourage the public from using CP1 to access other areas of North Head. The money gained from this potential initiative may be used for improvement works to the Q Station.</p> <p>Customer take up of ferry's as a mode of transport is heavily dictated by external conditions, rather than measures that can be effectively implemented by the co-proponents.</p>  | Compliant     |



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| 140 | <p>The wharf facility shall be used in accordance with the following provisions:</p> <ol style="list-style-type: none"> <li>the wharf shall only to be used for the casual berthing of the vessel "The Jenner", or an appropriate vessel of similar dimensions and loadings. Assistance must be provided to persons with mobility limitations;</li> <li>the ferry must always dock at the head of the wharf (i.e. The north-western end) until such time as any future alterations to the wharf have been assessed and approved by the relevant authorities;</li> <li>the ferry shall not moor at the wharf when not in active use (i.e. overnight);</li> <li>the ferry shall not moor at the wharf during unsuitable weather events (e.g. storms, strong winds, large swells);</li> <li>the co-proponents shall ensure that there is no access to the wharf as part of the activity by recreational or commercial vessels until such time as any proposed access arrangements for these vessels have been assessed and approved by the relevant authorities. The wharf shall include signage to indicate that access is prohibited unless authorised by the Waterways Authority and DEC;<sup>50</sup> and.</li> <li>There shall be no vessel access on the south-western side of the wharf, parallel to Cannae Point</li> </ol> | <p>Site Inspection<br/>Auditee Interview 03/02/22<br/>Complaints Register Current to 2021<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/>Lease Agreement AC529277C, 14/04/06</p>                         | <p>The Jenner sank prior to the audit period. The Jenner was an historic vessel that formerly operated as part of the Quarantine Station, and was purchased by Mawland to provide a ferry service from Manly to the Q Station.<br/><br/>The ferry was not operational at the time of the site inspection. Sighted Lease Agreement AC529277C dated 13 April 2006 for the period 1 December 1999 to 30 November 2050 between Waterways Authority as Lessor and the Minister Administering the National Parks and Wildlife Act 1974 as Lessee for the Wharf, described as Lot 10 in Deposited Plan 1081268. Section 6.1 of the lease set's out the requirements of CoA 140.</p>   | Compliant |
| 141 | <p>Minor variations to the provisions of condition 140), a), b) and c) above may be approved by the Waterways Authority and the DEC, upon receipt of an application from the co-proponents. The application shall address, but not be limited to, safe berthing/mooring arrangements, disabled visitor access, potential impacts on seagrasses (e.g. from overshadowing and propellor wash) and Little Penguins.<br/><br/>Any significant variations to these conditions, and any variations to condition 140) e), shall (if necessary) require a separate application and approval under Part 5 of the <i>Environmental Planning and Assessment Act 1979</i> and other relevant legislation.<br/><br/>The Waterways Authority and DEC shall consult with NSW Fisheries before any variations are approved.</p>  | <p>Auditee Interview 03/02/22<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p>  | <p>An application to the Office of Environment and Heritage was made on 20/09/2018 for the installation of additional fender piles at the wharf to assist with the docking of a large ferry as part of the Invictus Games. This application was approved on 5 October 2018 following consultation.</p>   | Compliant |
| 142 | <p>When the ferry is not available for use (due to extreme weather events or maintenance) the co-proponents shall provide a shuttle bus or some other means of public transport between the site and Manly.</p>  | <p>Auditee Interview 03/02/22<br/>Complaints Register Current to 2021</p>  | <p>When the ferry is not available a shuttle bus is used for transport unless there is only 1 –2 passengers, in which case Q Station organises a taxi for the guests.<br/><br/>At the time of the audit the Q Station had five shuttle buses in operation.</p>   | Compliant |
| 143 | <p><b>Road-based Access</b><br/><u>Private vehicle targets</u><br/><br/>The co-proponents shall undertake 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.</p>   | <p>Auditee Interview 03/02/22<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p>Mawland management reported that approximately 70% of visitors arrive by private vehicle.<br/><br/>Review practicable measures to encourage visitors to arrive by ferry or seek modification of the condition if it cannot be practically achieved.<br/><br/>The 2020 and 2018-2019 Annual Environmental Reports state that "At least 50% of access by guests is by car or private bus arrival. Q Station suggests water arrival to all guests for conferences and functions".<br/><br/>Vehicular numbers are calculated by Reception when guests register. Vehicular access to the Q Station is for a number of reasons including, to stay, for dinner, casual visitors and those wanting to access the beach.<br/><br/>Information concerning the ferry service was available on the Q Station website including links to the My Fast Ferry timetable. Tickets [when operational] are able to be ordered online.<br/><br/>Mawland management reported that they had approval from NPWS to implement paid parking at CP1 to discourage the public from using CP1 to access other areas of North Head. The money gained from this potential initiative may be used for improvement works to the Q Station.<br/><br/>Customer take up of ferry's as a mode of transport is heavily dictated by external conditions, rather than measures that can be effectively implemented by the co-proponents.</p> | Compliant |

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| 144 | <p><u>Management of vehicle access</u></p> <p>A 15 km/h speed limit for all vehicles within the site shall be imposed within 3 months of the commencement date.</p>   | Site Inspection<br>Accor Induction   | The speed limit with the Q Station was observed to be 15 km/h.<br>The Accor Induction includes a Driver Induction that requires inductees to sign and acknowledge the 15 km/h speed limit on-site.   | Compliant |
| 145 | <p>As a priority measure, traffic calming devices shall be provided within 6 months of the commencement date along the following roads:</p> <p>a) from A26 to CP5;<br/>b) from S12 to S5; and<br/>c) from A26 to A23 (no traffic calming devices are required between S15 and P13)</p>  | Site Inspection  | Traffic calming devices were observed on internal roads to the Q Station during the site inspection.   | Compliant |
| 146 | The devices shall be in accordance with the endorsed design standards [condition 106) c)], spaced at appropriate distances apart and sign-posted with the speed limit (15 km/h) and Long-nosed Bandicoot warning/awareness signs.   | Site Inspection<br>Accor Induction – Driver Induction Checklist<br>Auditee response on draft audit report, 18/03/22. | <p><b>Observation</b></p> <p><b>Other than staff, contractors and disabled visitors no one else is permitted to drive within the Q Station; however, no signposts displaying the 15 km/h speed limit were observed at traffic calming devices at the time of the site inspection.</b></p> <p><b>Conduct a review of speed management signage on-site.</b></p> <p><b>Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that six (6) 15km/h speed zone signs had been erected.</b></p> <p>Traffic calming devices were observed on internal roads to the Q Station during the site inspection. Traffic calming devices appeared to be spaced at appropriate distances.</p> <p>Long-nosed Bandicoot warning/awareness signs were observed on internal roads during the site inspection.</p> <p>Sighted the Driver Induction Checklist that included, but not limited to, instructions on who can drive where on-site, the location, purpose and hazards associated with parking areas, flora and fauna, night driving and staff parking (CP1 and CP5).</p> | Compliant |
| 147 | Vehicle access to the site is to be managed by an entrance boom gate that only opens when triggered by staff or contractors.  | Site Inspection  | A boom gate was located adjacent to the Reception building at the entrance to the Q Station.   | Compliant |
| 148 | Barriers delineating the extent of vehicle access with the site are to be provided within 6 months of the commencement date in accordance with Figure 2.1 of the PAS. In accordance with condition 151) c) within 10 years of the commencement date, the barriers on the road below S2, between S2 and A23 and adjacent to A1 must be replaced with a barrier adjacent to A18 (or at a suitable location east of A18).                            | Site Inspection  | A boom gate was located adjacent to the Reception building at the entrance to the Q Station. The main boom gate and control of vehicles at the entry achieves the performance outcomes of condition 149 and therefore negates the need for the internal barriers.  | Compliant |
| 149 | <p>There shall be no vehicle access beyond the barriers described in condition 148) except for:</p> <p>a) vehicles transporting disabled visitors;<br/>b) vehicles driven by representatives of the co-proponents, service providers and contractors;<br/>c) visitors and guests being transported by shuttle-bus, people-mover or some other form of low-scale public transport (not large buses or coaches); and<br/>d) emergency vehicles.</p> | Site Inspection  | There is no vehicular access to Q Station past the entrance boom gate except in accordance with the requirements of this CoA.  | Compliant |
| 150 | <p>Bus and coach access to the site shall be as follows (see also condition 65(b) and 151):</p> <p>a) coaches shall not enter the site beyond CP1;<br/>b) until CP1 is completed buses may enter the site and use the loop road from A26 to S12 to S5 and to the temporary bus parking area adjoining A26; and<br/>c) after CP1 is completed buses shall also not enter the site beyond CP1.</p>  | Site Inspection  | Internal roads were observed to be generally too small for coaches. CP1 was completed prior to the audit period. A regular public bus service, number 161 Manly to North Head (Loop Service) operates from Manly Wharf to the roundabout at the Q Station Visitor Centre on North Head Scenic Drive (Stop ID 209515 and Stop ID 2095100).  | Compliant |

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| 151 | <p><b>Vehicle parking</b></p> <p>On-site car parking shall occur as follows:</p> <p>a) <b>CP1</b> – may provide up to 120 vehicle spaces, constructed in two stages as proposed in the PAS, to be used by day visitors, overnight guests and staff (if necessary);</p> <p>b) <b>CP5</b> – may provide up to 56 vehicle spaces, constructed in two stages as proposed in the PAS, to be used by staff and overnight guests but no day visitors (including conference or function participants);</p> <p>c) <b>existing administration car park (opposite S1)</b> – may provide short-stay parking for accommodation check-in on the following basis:</p> <ul style="list-style-type: none"> <li>accommodation guest use of this parking area shall be gradually decreased between 5 and 10 years of the commencement date, so that within 7.5 years of the commencement date such usage has decreased by 50% (this excludes taxis, delivery and operations vehicles);</li> <li>use of this parking area by accommodation guests shall be completely phased out within 10 years of the commencement date, to comply with the long-term car-free boundaries of the DACMP; and</li> <li>during the above periods the co-proponents shall examine and test alternative check-in parking arrangements, including the option of using the area shown as “Potential Drop Off and Parking” in Illustration 20 of the DACMP;</li> </ul> <p>d) <b>bus and coach parking</b> – the following arrangements shall apply:</p> <ul style="list-style-type: none"> <li>until CP1 is completed buses may only park in the bus parking area adjoining A26, as shown in Figure 2.1 of the PAS;</li> <li>until CP1 is completed coaches may only drop-off visitors at the entrance to the site and park at an off-site location (if necessary);</li> <li>once CP1 is completed, buses and coaches may drop off visitors at CP1 and either park in CP1 or outside the site (if necessary); and x once CP1 is completed, there shall be no bus or coach parking elsewhere on the site.</li> </ul> | <p>Site Inspection<br/> <a href="http://www.qstation.com.au">www.qstation.com.au</a><br/>           SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/>           SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/>           Interview with auditees 13/05/22</p> | <p>CP1 provides space for 120 vehicles and was completed prior to the audit period.<br/>           CP5 and the Administration Car Park operate as staff / disability parking only.</p> <p>The Department, in its comments on the draft Audit Report, stated that it considered that guest use of the administration precinct car park opposite S1 has been phased out. The auditees responded by stating that the parking area is used for check-in parking for the elderly and disabled. There is no day or overnight parking permitted. Given the 10 year period has well passed the requirement to examine and test alternatives has also passed.</p> | Compliant |
| 152 | <p>Overflow parking may be provided:</p> <p>a) as part of up to 6 approved special events per year (condition 125); and</p> <p>b) during the physical construction stages for the new car parks (i.e. during Stages 1 or 2 of CP1 or CP5). Once a stage is complete, no further overflow parking associated with car park construction may occur until the next stage of construction commences.</p> <p>Total overflow parking at any one time shall be limited to up to 50 vehicles and shall be entirely restricted to formed road surfaces (i.e..not grassed areas) between building S14 and the first road junction immediately south-west of the upper reservoir</p>   | <p>Auditee Interview 03/02/22<br/>           SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p>  | <p>The following events occurred during the audit period, none of which required the use of overflow parking</p> <ul style="list-style-type: none"> <li>Open Day 15 September 2019 – 315 people.</li> <li>Open Day 28 April 2019 - 238 people.</li> <li>Boxing Day 26 December 2018 Hospital Area - 100 People.</li> <li>Invictus Games Event 19 October 2018 - 400 people plus volunteers.</li> </ul>   | Compliant |
| 153 | <p>There shall be no vehicle parking outside of the CP1, CP5, administration area car park, or overflow parking, except for short-term parking for service providers, contractors and the like.</p>   | <p>Site Inspection<br/>           Interview with auditees 13/05/22</p>  | <p>No vehicles were observed to be parking outside of CP1 and CP5 at the time of the site inspection.</p> <p>The Department, in its comments on the draft Audit Report, stated that it considered that guest use of the administration precinct car park opposite S1 has been phased out. The auditees responded by stating that the parking area is used for check in parking for the elderly and disabled. There is no day or overnight parking permitted.</p>   | Compliant |

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| 154 | <p><b>Car-park Design</b></p> <p>The co-proponents shall ensure that car-parks are designed and constructed in accordance with the following design principles:</p> <ol style="list-style-type: none"> <li>designated disabled car parking spaces must be provided onsite in accordance with relevant Australian Standards, the BCA and to achieve compliance with the <i>Disability Discrimination Act</i>;</li> <li>secure parking for at least 10 bicycles, plus parking for motorcycles, shall be provided at CP1 (such parking may also be provided at CP5);</li> <li>the internal area of car parks shall be generally devoid of any vegetation (with the exception of existing threatened species or communities) that may harbour or provide a foraging resource for fauna (especially Long-nosed Bandicoots);</li> <li>vegetation (using local native species) shall be planted and maintained to screen CP1 and CP5. The vegetation screens shall allow for the movement of fauna;</li> <li>car parks shall not be enclosed by fencing that may trap individual fauna i.e gaps of sufficient dimensions to allow passage by bandicoots will be provided between and/or under any barriers<sup>54</sup>;</li> <li>sufficient low-level lighting shall be provided in the car parks to allow drivers to detect fauna;</li> <li>the eastern boundary of CP5 shall be defined by fencing that prevents vehicle access and discourages human access to the adjoining area of Eastern Suburbs Banksia Scrub; and</li> <li>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 on an area elsewhere at North Head up to 20 times the size of the area impacted (i.e approximately 0.3 hectares). Details of the area of ESBS to be affected and the areas proposed for regeneration, including regeneration methods consistent with the Heritage Landscape Master Plan, are to be submitted with the construction works application for CP5.</li> </ol> <p><sup>54</sup> incorporates a condition of concurrence, as granted by the Minister for the Environment under the EP&amp;A Act 1979</p> | Site Inspection   | <p>The car parks were designed and constructed prior to the audit period.</p> <p>Check during site inspection</p> <ol style="list-style-type: none"> <li>Vehicles for disabled visitors are parked in CP5 and driven to the guests accommodation when requested.</li> <li>Bicycle parking was available on a grassed area outside the entrance to Reception at CP1.</li> <li>The internal areas of CP1 included a strip of low level plants along the centre line of the car park but was in general devoid of any vegetation. CP5 was devoid of vegetation.</li> <li>CP1 and CP5 was observed to be planted with local native species to screen the car parks.</li> <li>CP1 and CP5 were not enclosed with fencing at the time of the site inspection.</li> <li>Four double bulbed Street lights were located in CP1 at the time of the site inspection. At night these would allow drivers to detect fauna; however, they are not low-level in terms of height.</li> <li>The eastern boundary of CP5 was defined by fencing that prevents vehicle access and discourages human access to the adjoining area of Eastern Suburbs Banksia Scrub at the time of the site inspection.</li> <li>CP5 was constructed prior to the audit period.</li> </ol> | Compliant     |
| 155 | <p><b>Shuttle Bus</b></p> <p>The co-proponents shall provide a shuttle bus service to transport visitors between the Manly Town Centre and the site (see also condition 65). The shuttle bus shall:</p> <ol style="list-style-type: none"> <li>have a minimum capacity of 12 persons per trip;</li> <li>be operational within 6 months of the commencement date;</li> <li>provide a minimum of 3 trips to and from the site (total 6 trips) per day on weekends and public holidays during peak periods of visitor activity or as approved by the DEC. Preference is also to be given to operation of the shuttle bus service during periods of peak night visitation and activity for the Long-nosed Bandicoot.</li> </ol> <p>Full details of the shuttle bus operation shall be included in the Access Strategy (condition 118)</p>   | <p>Auditee Interview 03/02/22 and 13/05/22</p> <p><a href="http://www.transport.nsw.gov.au">www.transport.nsw.gov.au</a></p>                                  | <p>It is understood that a shuttle bus was available within six months of the commencement date but that there was minimal uptake by visitors and guests and due to the availability of the public bus route.</p> <p><b>There is no evidence of the shuttle bus providing services in line with this condition (due to limited uptake). The shuttle instead runs on an as needed basis. This information is advertised at Reception and in guest compendiums, however there is no formal evidence available that sets out the frequency of trips.</b></p> <p>Other than being reported in the Annual Environmental Report this has not been communicated to the Department.</p> <p>A public bus service, number 161 Manly to North Head (Loop Service), operates from Manly Wharf to the roundabout at the Q Station Visitor Centre on North Head Scenic Drive (Stop ID 209515 and Stop ID 2095100).</p>  | Non-compliant |
| 156 | <p><b>Visitor monitoring</b></p> <p><u>General</u></p> <p>A visitor monitoring program is to be established in accord with Policy AIP 3.2 in the DACMP and submitted for approval as part of the final Access Strategy (condition 118). In addition to the matters specified in AIP 3.2, the program must also make specific provision for the monitoring of:</p> <ol style="list-style-type: none"> <li>visitor numbers, capacities and entry details (e.g. booked on a tour, accommodation booking, or un-booked day visitor);</li> <li>mode of access to the site;</li> <li>visitor profiling (to include age, cultural background, language spoken, geographic origin, disability status);</li> <li>visitor impacts on the site's values, including both physical impacts (such as measurable damage or wear to fabric, impacts on fauna behaviour, etc) and non-physical impacts (such as amenity); and</li> <li>measures taken, or proposed to be undertaken, to minimise private vehicle access. This should include the progress or outcomes of any negotiations with other North Head land managers regarding off-site car-parking.</li> </ol>   | <p>Mawland, Visitor Management Plan, March 2005</p> <p><i>Visitor Access Strategy</i></p> <p><i>Security Plan</i></p> <p><i>Emergency Evacuation Plan</i></p> | <p>Sighted the Visitor Management Plan dated March 2005 that was approved by the Department on 10 August 2005 (p.5). The plan includes indicators that have been transferred into the Integrated Monitoring and Adaptive Management System (IMAMS). The IMAMS coordinates the monitoring and adaptive management for environmental, cultural, social and economic conditions.</p> <p>Metrics including, but not limited to: Visitor Access, Visitor Numbers, Representation of Leisure Target Market, Satisfaction of the Target Market, Customer Complaints and Public Complaints are included in the Social /Visitation / Community Involvement section of the IMAMS.</p>   | Compliant     |



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| 157  | Where the visitor monitoring program identifies adverse impacts associated with the activity the co-proponents must, in consultation with the DEC, identify and implement appropriate management responses. These may include, but are not limited to, altering any relevant activity, temporarily ceasing specific activities or ceasing some uses altogether if impacts cannot be adequately addressed.  | Auditee Interview 03/02/22<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br><br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21  | Other than the COVID-19 pandemic impact to visitor numbers in 2020 and 2021 there were no adverse impacts associated with visitor monitoring during the audit period.   | Not Triggered |
| <b>Flora, Fauna &amp; Marine Environment</b> |  |  |   |               |
| 158  | <b>General</b><br>The co-proponents shall engage a person(s) trained in basic fauna and flora identification and in possession of the appropriate licences (e.g. for fauna handling) to monitor construction activities for the duration of the work. The functions of that person(s) shall include, but are not limited to:<br>a) the inspection of work areas every morning prior to work commencing to allow the identification and relocation of any fauna species present (fauna are to be re-located to the nearest area of suitable habitat within the site); and<br>b) the regular inspection of work areas at other times to ensure no inadvertent impacts to flora and fauna are occurring.<br>The person(s) is to report directly to the Environmental Manager. | Auditee Interview 03/02/22<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br><br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br><br>Wires Program Certificate, 02/02/22 | During the reporting period the NPWS Rangers assisted in the removal of Brush Turkeys from the cafe area on a number of occasions.<br><br>The General Manager is WIRES accredited. During construction works in the audit period, fauna and flora checks were undertaken by a NPWS Ranger or the Environment Manager. There were no reported issues during the reporting period. The Auditor was unable to verify | Compliant     |
| 159  | Any fencing or barriers to be provided for active work areas shall not limit the general movement of fauna across the site. However, sites of specific potential risk to fauna (e.g. open excavation) shall include measures to prevent fauna access (e.g. limited fencing or covers) and/or to allow their egress/escape (e.g. earth ramps).  | Site Inspection<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21   | No active work areas were observed during the site inspection.<br><br>The 2018-2019 Annual Environmental Report notes that during reconstruction works for P21 and P23, open excavations were covered every evening by the contractor (Westbury Constructions) and that fencing and was regularly inspected by the Environmental Manager and the NPWS Ranger.   | Compliant     |
| 160  | No hollow-bearing trees or threatened flora are to be removed, although limited lopping or trimming may occur with approval from the DEC. Existing Coral trees in the Wharf Precinct shall be the subject of regular inspection and maintenance by a suitably qualified person to ensure safe access to this area for site visitors. Any areas proposed for vegetation clearance or removal are to be surveyed by a suitably qualified person for the presence of hollow-bearing trees and threatened flora, which are to be clearly tagged and identified for retention.  | Auditee Interview 03/02/22<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21  | A Coral Tree in Peace Park fell down and was removed from site for safety in December 2019. Prior to removal it was inspected by a NPWS Ranger and Arborist and was found to contain no wildlife.<br><br>No hollow-bearing trees or threatened flora were removed during the audit period.  | Compliant     |
| 161  | The proposed design and location of any artificial nesting sites or boxes (including for Little Penguins) are to be endorsed by the DEC. Nest boxes are to be designed to limit the potential for use by possums.  | Auditee Interview 03/02/22<br>Site Inspection  | No nest boxes were installed during the audit period.   | Not Triggered |
| 162  | Details of the methods and approaches to be used in meeting the monitoring requirements specified in the conditions of approval for Long-nosed Bandicoots and Little Penguins will be submitted to the DEC for approval prior to monitoring commencing.  | Auditee Interview 03/02/22   | This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified and was therefore not assessed as part of this audit.   | Not Triggered |
| 163  | <b>Long-nosed Bandicoot</b><br><u>General</u><br>Within 6 months of the commencement date the co-proponents shall update signage along Darley Road and into the Quarantine Station to strengthen warnings to vehicle drivers regarding the presence of Long-nosed Bandicoots and the need for slow and careful driving (see also conditions 145)-146).   | Site Inspection<br>Auditee response on draft report, 08/03/22  | Bandicoot warning signs were observed along Darley Road at the time of the site inspection. These can be moved around the site.<br><br>The Auditor observed a warning sign inside the Q Station was on Entrance Road approximately 50 m south of the entrance boom gate.  | Compliant     |

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| 164 | Grassed areas on the site must be kept in good condition. No fertilisers or chemicals should be applied to open grassed areas, except where this is essential to the repair and stabilisation of existing eroded areas and is consistent with the provisions of the approved Heritage Landscape Master Plan (condition 91).   | Site Inspection<br>Auditee response on draft report, 08/03/22  | <b>Observation</b><br><b>A shoulder garden pressure sprayer was observed in the Maintenance Shed at the Glasshouse (A24). Handwritten on the sprayer in marker were the words 'Poison Roundup'.</b><br><b>Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that RoundUp had been removed from site. Mawland also states that it is of the view that RoundUp had not been used since 2016. No evidence was sighted by the Auditor to support this position.</b><br>Grassed areas were observed to be well maintained. | Compliant     |
| 165 | Within 12 months of the commencement date the co-proponents shall undertake further assessments 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. The outcomes of the assessment should be informed by the monitoring program specified in Schedule 5 and are to be submitted to the DEC for approval and incorporated into the Heritage Landscape Management Plan (condition 91) prior to any habitat works commencing.                                  | Price & Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br>Price & Banks <i>et al</i> , An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report   | <b>Observation</b><br><b>The outcomes of the finalised Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population should be incorporated into an updated Heritage Landscape Management Plan (CoA 91).</b><br>A draft Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population was prepared in April 2021.  | Compliant     |
| 166 | Any works undertaken for the activity that involve the loss of, or damage to, Long-nosed Bandicoot foraging habitat shall be 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.  | Auditee Interview 03/02/22<br>NPWS, Bandicoot Mortality Register, September 2021   | The co-proponents reported that no Long-nosed Bandicoot habitat enhancement, reconstruction or rehabilitation works occurred during the audit period.  | Not Triggered |
| 167 | <u>Monitoring</u><br>The co-proponents shall implement the monitoring program detailed in Schedule 5  | Price & Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br>Price & Banks <i>et al</i> , An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report<br>NPWS, Bandicoot Mortality Register, September 2021   | Monitoring reports for the audit period were available for review. It is noted COVID-19 restrictions prevented some on-site monitoring being conducted during 2020 and 2021.<br>The 2021 monitoring Long-nosed Bandicoot monitoring report was in the process of being prepared at the time of the audit.  | Compliant     |
| 168 | <u>Adaptative Management – foraging habitat</u><br>If the monitoring of bandicoot activity and use of foraging habitat indicates a statistically significant <sup>61</sup> reduction in bandicoot numbers between the control and non-control areas over two consecutive years, measures will be taken, in consultation with the DEC, to reduce the extent of light, noise and activities at relevant locations. Measures may only be reversed or altered with the approval of the DEC (see also condition 133).<br><sup>61</sup> statistically significant is defined as the 5% probability level. | Price & Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br>Price & Banks <i>et al</i> , An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report   | A draft report dated April 2021 on the analysis of the May 2020 census of the North Head Long-nosed Bandicoot population identified that 2020 results indicate that bandicoot numbers have remained relatively stable since 2016 and that the “ <i>observed population remains similar to the number recorded in 2004</i> ”.   | Compliant     |
| 169 | <u>Adaptative management – road mortalities</u><br>All adaptive management measures presented in Schedule 6 must be implemented and the co-proponents must contribute to the mitigation of potential impacts on the Long-nosed bandicoot population across North Head. This includes, but is not limited to, participation in the North Head Stakeholder Group, or its successors. The co-proponents will actively promote awareness of the need for bandicoot protection across North Head.  | Site Inspection<br>Price & Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br>Price & Banks <i>et al</i> , An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report<br>NPWS, Bandicoot Mortality Register, September 2021<br>North Head Stakeholder Group Meeting Minutes – 18/08/21, 17/03/21, 02/12/20, 01/07/20, 11/03/20, 18/12/19, 18/09/19, 01/05/19, 20/02/19, 10/07/18 | Adaptive management measures presented in Schedule 6 were implemented, where required and triggered, during the audit period.<br>The co-proponents of the North Head Stakeholder Group and actively promote awareness of the need for bandicoot protection across North Head. Minutes of meetings for the audit period were available for review with references to bandicoot issues.  | Compliant     |



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| 169A | <p>The co-proponents must provide signage at the entrance to Sydney Harbour National Park near Parkhill Archway, to indicate the number of Long-nosed Bandicoot road mortalities recorded on North Head. The sign(s) shall include, but not be limited to, a short statement regarding the endangered status of the population, its estimated population size (within North Head), the threat that road deaths pose to its continued survival, the total number of deaths from the previous year and a running tally of the number of deaths during the current calendar year. The tally shall be updated after each confirmed road death as recorded on the mortality register referred to in Schedule 5. The sign shall also include a 24 hour phone number (see also Term 6) to allow members of the public to inform the lessor of any mortalities and what to do if an injured bandicoot is found.</p> | <p>Site Inspection<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/>Site photo provided by NPWS, dated 25/02/22</p>  | <p>Bandicoot warning signs were observed along Darley Road at the time of the site inspection; as was signage at the entrance to Sydney Harbour National Park near Parkhill Archway, to indicate the number of Long-nosed Bandicoot road mortalities recorded on North Head was not observed.<br/><br/>The 2018-2019 Annual Environmental Report states that "New signage designed and erected following approval of MP08_0041 MOD 3. This signage was approved by the Department in an email dated 29 March 2019".</p>  | Compliant     |
| 170  | <p><u>Calculating the background level of adult road mortalities</u><br/>For the first year following the commencement date the background adult road mortality level is set at 10 deaths<sup>64</sup> in 6 consecutive months. The background adult road mortality level is to be recalculated at the end of each consecutive year of mortality monitoring as detailed in Schedule 7.<br/><sup>64</sup> drawn from the basic scenario of a population of 100 animals with 10% adult mortality every 6 months used in the population viability analysis (Banks 2000) and population census undertaken in 2002 (Banks and Hayward 2002).</p>   | <p>Auditee Interview 03/02/22<br/>Price &amp; Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br/><br/>Price &amp; Banks <i>et al</i>, An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report<br/><br/>NPWS, Bandicoot Mortality Register, September 2021</p> | <p><b>Observation</b><br/><b>Long-nosed Bandicoot mortality numbers are not reported in the monitoring program reports. Instead, mortality numbers are managed by the NPWS Saving Our Species team.</b><br/><b>Consideration should be given to including mortality numbers in the monitoring reports to provide greater context to the Long-nosed Bandicoot population in one consolidated document.</b><br/><br/>NPWS Saving Our Species team maintains a register for Long-nosed Bandicoot mortality.<br/><br/>There were no Long-nosed Bandicoot deaths recorded at the Q Station in 2018 or 2019. One Long-nosed Bandicoot death was recorded in August 2020, the cause of death was stated as 'roadkill'. No Long-nosed Bandicoot deaths were recorded at the Q Station to September 2021.</p> | Compliant     |
| 171  | <p><u>Future measures</u><br/>The Lease shall stipulate requirements regarding the provisions of funding to the OEH to undertake a revised Population Viability Assessment (PVA) for the Long-nosed Bandicoot every 6 years from the determination date of Modification 3.</p>  | <p>Auditee Interview 03/02/22<br/>Lease AC928975B, 26/10/06<br/>Letter – NPWS to Mawland, Quarantine Station Lease &amp; Planning Modifications - Interpretation Aide, 27/06/18</p>   | <p>A letter from NPWS to Mawland dated 27 June 2018 provided clarity to the co-proponents concerning the lease and any modification(s) to the instrument of approval and that where modifications differ from the lease, that the modification instrument is to prevail over any contradictory lease terms.</p>  | Compliant     |
| 172  | <p>Based on the revised PVA, the provisions of any adopted recovery plan for the Long-nosed Bandicoot population and following consultations with the co-proponents, the Minister for the Environment may recommend to the Minister for Infrastructure, Planning and Natural Resources that the trigger thresholds, background adult road mortality levels and/or adaptive management measures be revised. Prior to the Minister for Infrastructure, Planning and Natural Resources agreeing to any significant revised measures, the details of the proposal and the PVA are to be made available for public comment</p>   | <p>Auditee Interview 03/02/22<br/>Price &amp; Banks <i>et al</i>, Population Viability Analysis on the Endangered North Head Long-nosed Bandicoot Population: Based on long-term data from 2004 to May 2020, July 2021, Draft</p>   | <p>A draft Population Viability Analysis on the Endangered North Head Long-nosed Bandicoot Population was conducted in July 2021.<br/>No direction from the Minister for the Environment occurred during the audit period.</p>   | Not Triggered |
| 173  | <p>The co-proponents shall ensure that the undertaking of the activity complies with any revised measures specified in condition 172).</p>  | <p>Auditee Interview 03/02/22<br/>Price &amp; Banks <i>et al</i>, Population Viability Analysis on the Endangered North Head Long-nosed Bandicoot Population: Based on long-term data from 2004 to May 2020, July 2021, Draft</p>   | <p>No revised measures were specified for CoA 172 during the audit period.<br/>A draft Population Viability Analysis on the Endangered North Head Long-nosed Bandicoot Population was conducted in July 2021.</p>  | Not Triggered |

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| 174 | <p><b>Little Penguins</b><br/><u>General</u><br/>Prior to the opening of the restaurant in Building A6 for public use or the commencement of ferry services to the site (whichever comes first), and following approval of the detailed designs by the DEC, permanent barrier fencing (that maintains access for penguins) shall be provided to actively discourage human access to Little Penguin habitat at:</p> <ol style="list-style-type: none"> <li>the northern end of Quarantine Station Beach, in the vicinity of the mean high water mark. The fence shall include signage to indicate that no access along the rocky foreshores is permitted;</li> <li>the southern end of the Quarantine Station Beach, in the vicinity of the cliff-line and water's edge adjacent to the concrete slipway (W1/A13a). The fence shall include signage to indicate that no access along the rocky foreshores is permitted; and</li> <li>at least 1.5 metres from the western edge of the existing drain adjacent to Building A6 (i.e. towards the building). Consideration shall be given to the use of dense plantings, rather than a fence made of timber or other materials, in the design of the barrier.</li> </ol> <p>To avoid adverse visual or cultural impacts the fences shall be constructed of suitable materials and to the minimum height and scale necessary to discourage human access. It is not required that the fences be human-proof (eg. cyclone fencing).</p> | Auditee Interview 03/02/22<br>Site Inspection<br>NPWS, Manly Little Penguin Recovery Program 2020/21, FINAL Monitoring Report, 21/0/21  | <p>A wooden fence was located directly adjacent to the Boilerhouse outdoor entertainment area to provided protection to the Little Penguin corridor.</p> <p>A chain link fence was observed along Quarantine Station Beach and in front of the Boilerhouse (Building A6) which provides protection to the Little Penguin colony.</p>  | Compliant |
| 175 | Between sunset and sunrise in the breeding season (July to February inclusive) temporary moveable signage, with appropriate temporary lighting, if necessary, shall be provided on Quarantine Beach. The signs are to be located on the beach above the mean high-water mark in the approximate vicinity of the intersection of buildings A6 and A7. The signs are to advise visitors that access beyond the signs to the northern part of the beach is not permitted, to minimise potential impacts on wildlife.  | Site Inspection   | A moveable gate was observed at Quarantine Beach to prevent access after sunset. A NPWS sign was located on Quarantine Beach warning of the Little Penguins is located on Quarantine Beach. Mawland management reported that signs indicating the presence of wildlife after sunset generally attracts the attention of visitors.   | Compliant |
| 176 | No spotlighting for Little Penguins is to occur from the ferry or from within the site, unless it is being undertaken as part of an approved special interest tour.  | Auditee Interview 03/02/22<br>Site Inspection<br>Complaints Register Current to 2021<br>Incident Register Current to 2021   | <p>No spotlighting occurred during the audit period.</p> <p>The ferry was not operating at the time of the audit due to COVID-19 restrictions.</p> <p>Tours do not take place near the Little Penguin habitat. Spotlighting is not allowed on tours.</p> <p>No complaints were or incidents reported during the audit period concerning spotlighting for Little Penguins.</p>   | Compliant |
| 177 | <p><u>Monitoring</u><br/>The co-proponents will negotiate with the DEC an annual contribution to assist the on-going implementation of any monitoring programs established as part of the Little Penguin Recovery Plan. The contribution will be adjusted annually to reflect changes in the CPI.</p>  | Auditee Interview 03/02/22<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21 | <p>Annual contributions were paid on the following dates during the period:</p> <ul style="list-style-type: none"> <li>2021 - Billed with invoices and paid with rent.</li> <li>15 April 2020.</li> <li>5 September 2018</li> <li>3 June 2019 (although due to a credit, no payment was required to be made).</li> </ul>  | Compliant |
| 178 | In the event that any monitoring program under the Little Penguin Recovery Plan ceases to operate during the life of the approval, the co-proponents shall be responsible for developing, implementing and funding a monitoring program that specifically monitors the potential impacts generated by activities within the site.  | Auditee Interview 03/02/22<br>NPWS, Manly Little Penguin Recovery Program 2018/19 Monitoring Report, 06/05/19<br>NWPS, Manly Little Penguin Recovery Program 2020/21 FINAL Monitoring Report, 21/09/21  | <p>Little Penguin monitoring reports were available for the periods 2018 to 2019 and 2020 to 2021.</p> <p>The breeding of Little Penguins was monitored during the 2018/2019 breeding season fortnightly from July 2018 until February 20219. The 2020/2021 breeding season was monitored fortnightly from July 2020 until December 2020, at which point COVID-19 lockdown restrictions prevented access to the site until the season had finished.</p> | Compliant |

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| 179 | <p><u>Adaptative management</u></p> <p>The co-proponents shall comply with the adaptive management measures detailed in Schedule 8</p>  | <p>Auditee Interview 03/02/22<br/>NPWS, Manly Little Penguin Recovery Program 2018/19 Monitoring Report, 06/05/19</p> <p>NWPS, Manly Little Penguin Recovery Program 2020/21 FINAL Monitoring Report, 21/09/21</p> <p>North Head Stakeholder Group Meeting Minutes – 18/08/21, 17/03/21, 02/12/20, 01/07/20, 11/03/20, 18/12/19, 18/09/19, 01/05/19, 20/02/19, 10/07/18</p> | <p>The co-proponents reported that adaptive management measures were not triggered during the audit period but the dwindling numbers of Little Penguins have triggered action with the North Head Stakeholder Group.</p> <p>NPWS reported that fox baiting had increased during the audit period in an effort to protect the Little Penguins.</p> <p>The 2018/20219 and 2020/2021 Little Penguin monitoring reports note that Little Penguin breeding numbers remain low following a fox incursion and mass penguin killing at Manly in 2015. The 2020/2021 monitoring report notes that there was no breeding activity detected in the vicinity of the Q Station Boilerhouse and that this has caused a dramatic drop in numbers for the whole Q Station area.</p> <p>The Store Beach penguins were badly impacted by the 2015 fox attacks and associated human disturbance of the fox management program; however, numbers increased slightly in 2020/2021.</p> | Not Triggered |
| 180 | <p>The co-proponents will provide funding to the OEH to undertake a review of the long-term monitoring data and to provide recommendations on the long-term sustainability targets for the Manly Little Penguin population every five years from the determination date of Modification 3.</p>  | <p>Auditee Interview 03/02/22</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p>  | <p>Mawland reported that funding is billed in invoices from NPWS. Evidence was not available to the Auditor for review.</p> <p>Modification 3 (MP08_0041 MOD 3) was approved on 25 May 2018 therefore a review of the long-term monitoring data and provision of recommendations on the long-term sustainability targets for the Manly Little Penguin population is not due until 25 May 2023.</p> <p>SNC (2021) reported that funding was paid on 5 September 2018, 3 June 2019 and 15 April 2020.</p>   | Compliant     |
| 181 | <p>Based on the revised monitoring and long-term sustainability targets (Term 180) and following consultation with NPWS regarding the Little Penguin population, the Minister for the Environment may recommend to the Secretary that the trigger thresholds and/or negative adaptive management measures be revised. Prior to the Minister for Planning agreeing to any significant revised measures, the details of the proposal and the 5 year report are to be made available for public comment and consideration.</p>   | <p>Auditee Interview 03/02/22</p>   | <p>Modification 3 (MP08_0041 MOD 3) was approved on 25 May 2018 therefore a review of the long-term monitoring data and provision of recommendations on the long-term sustainability targets for the Manly Little Penguin population is not due until 25 May 2023.</p> <p>No recommendations from the Minister for the Environment were made during the audit period.</p>   | Not Triggered |
| 182 | <p>The co-proponents shall ensure that the undertaking of the activity complies with any revised measures specified in condition 181).</p>  | <p>Auditee Interview 03/02/22</p>   | <p>The Minister for the Environment did not make any requests during the audit period.</p>  | Not Triggered |
| 183 | <p><b>Marine Environment</b></p> <p><u>General</u></p> <p>Within 6 months of the commencement date the co-proponents shall commence 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. Other relevant stakeholders shall also be consulted. As a minimum, options for restricting or discouraging mooring should generally target the “patchy seagrass” area shown in Figure 1 of Appendix F of the EIS. However, if critical habitat is declared for the Little Penguin population the provisions of the critical habitat listing will take precedence over any other measures.</p> | <p>Auditee Interview 03/02/22</p> <p>Manly Council, Little Penguin Critical Habitat Map, DECC, September 2009</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> <p>Email – Mawland to NPWS, Quarantine Beach/Bay – Mooring, 02/02/22 @14:12hrs</p>   | <p><b>Observation</b></p> <p><b>Only two yellow markers were observed to delineate the no mooring area for the seagrass meadow and Little Penguins. NPWS notes that the moorings reside outside the land defined under the CoA and lease. The moorings are the responsibility of TfNSW. NPWS is actively working with TfNSW as well as DPI Fisheries to improve the visibility of the demarcation line.</b></p> <p><b>Continue to work with TfNSW and DPI to reduce risk of private boat mooring in the immediate vicinity of the site.</b></p> <p>A Little Penguin Critical Habitat Map prepared by the former DECC in September 2009 identifies Quarantine Beach as Critical Habitat Area A. Critical Habitat Area A includes an aquatic area out to 50 metres from the mean high-water mark and a terrestrial area from the mean high water mark, up the rocky foreshore slope and includes ridgetop habitat.</p>  | Compliant     |

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| 184 | <p><b>Monitoring</b></p> <p>The co-proponents shall 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. Details of the methods and approaches to be used in monitoring seagrass beds will be submitted to NSW fisheries for approval prior to monitoring commencing.</p>   | <p>Auditee Interview 03/02/22</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> <p>EcoDivers, Seagrass In Quarantine Bay, 2019</p> <p>Eco Divers, Seagrass Information Update Quarantine Station, July 2018</p> <p>EcoDivers, Seagrass In Quarantine Bay, 2014</p> <p>Email – Mawland to EcoDivers, Eco Divers Seagrass Quarantine Bay, 15/01/20</p> <p>Letter, NSW DPI to Mawland, 10/12/2007 (DPI review of pilot monitoring and statement from DPI that further monitoring beyond th trial is not warranted)</p> | <p><b>In 2007 DPI reviewed the pilot seagrass surveys and determined that there were impacts on seagrass at this time as a result of propellers and anchors at Quarantine Bay. DPI also stated that no further seagrass monitoring was warranted. Despite this it appears as seagrass monitoring continued in an informal manner through 2018-2019. The Auditor is not aware of the rationale or reasoning for this. Monitoring reports were available for 2018 and 2019; however, monitoring was not conducted in 2020 and 2021 due to COVID-19 restrictions. The reports do not refer to the monitoring methodology, such the use of GPS, survey quadrants or sample analysis. The conclusions from the monitoring undertaken are not tracked or trended year-on-year and provide only commentary concerning the visual condition of the seagrass. A formal program would define the strategy and methodology for monitoring to the follow.</b></p> <p>The 2019 seagrass one page report notes that the main threat to the seagrass is from recreational vessels.</p> <p>The 2018 report (p.5) notes that increased non-anchoring and areas and enforcement of existing legislation is required to ensure some chance of survival and expansion of the existing seagrass.</p> <p>Sighted an email from Mawland to Eco Divers dated 15 January 2020 requesting Eco Divers updated the 2019 report.</p> | Compliant     |
| 185 | <p>Implementation of the seagrass monitoring program is to occur prior to commencement of the ferry services to the site. Monitoring must be undertaken by a suitably qualified marine ecologist.</p>   | <p>Auditee Interview 03/02/22</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> <p>EcoDivers, Seagrass In Quarantine Bay, 30/11/19</p> <p>Eco Divers, Seagrass Information Update Quarantine Station, July 2018</p> <p>EcoDivers, Seagrass In Quarantine Bay, 2014</p>  | <p>Monitoring is conducted by Eco Divers, a volunteer marine conservation organisation located in Manly. The 2019 Eco Divers report notes that they have been reviewing the seagrass for many years. The Eco Divers Report for 2021-22 is pending.</p> <p>Refer to CoA 184.</p>   | Compliant     |
| 186 | <p><b>Adaptive management</b></p> <p>If the monitoring of the seagrass beds indicates a significant reduction in the density, extent or condition of the seagrass beds, and NSW Fisheries is satisfied that such decreases are either fully or partially related to the activity, the co-proponents must consult with NSW Fisheries to implement appropriate measures to reduce impacts within a specified timeframe, and to provide habitat compensation at a ratio of 2:1</p>   | <p>Auditee Interview 03/02/22</p>  | <p>Formal monitoring of seagrass beds did not occur during the audit period; therefore this CoA has been identified as not triggered.</p>   | Not Triggered |
| 187 | <p>The co-proponents shall ensure that the undertaking of the activity complies with any measures specified in condition 186)</p>   | <p>Auditee Interview 03/02/22</p>  | <p>Formal monitoring of seagrass beds did not occur during the audit period; therefore this CoA has been identified as not triggered.</p>   | Not Triggered |
| 188 | <p><b>Predator and Pest Control</b></p> <p>A <b>Predator and Pest Control Plan</b> shall be prepared and implemented for the site. The Plan shall be submitted to the DEC for approval within 2 years of the commencement date. The plan should address relevant provisions of any adopted recovery plans and threat abatement plans and shall:</p> <ol style="list-style-type: none"> <li>detail measures for minimising the risk of predator and pest impacts; and</li> <li>detail measures for rapidly responding to identified threats, including an emergency shooting strategy</li> </ol> | <p>DECC &amp; NPWS, North Head Quarantine Station Predator and Pest Animal Plan, October 2008, Version 4</p>   | <p><i>This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified and was therefore not assessed as part of this audit.</i></p> <p>The Predator and Pest Animal Plan was presented to the QSCCC on 23 September 2008 and approved by the Deputy Director-General, Parks and Wildlife Group on behalf of the DECC on 15 November 2008.</p>   | Not Triggered |



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| 189                                  | Predator and pest control activities shall be undertaken in accordance with the approved plan. Until the plan is prepared and approved the co-proponents shall continue on-going consultation with the DEC regarding predator control measures to be applied.  | QSCCC Minutes, 10/11/21, Ref: DOC21/1014227, Draft<br>North Head Stakeholder Group Meeting Minutes – 18/08/21, 17/03/21, 02/12/20, 01/07/20, 11/03/20, 18/12/19, 18/09/19, 01/05/19, 20/02/19, 10/07/18 | Draft minutes from a QSCCC meeting held on 10 November 2021 noted that: <ul style="list-style-type: none"> <li>Rabbit shoots continue to be undertaken on a three-weekly basis for the next six months; and</li> <li>Ongoing 6 weekly ongoing baiting program with 1080 capsules in canid pest ejectors and 1080 ground baits at North Head.</li> </ul> North Head Stakeholder Group minutes dated 11 March 2020 noted that a rabbit shoot took place on 24 February 2020 and that eight rabbits were shot at the Q Station. Minutes for the meeting held on 18 September 2019 noted that 21 rabbits were spotted in the Q Station with 11 shot. | Compliant     |
| 190                                  | The co-proponents shall undertake a review of the <b>Predator and Pest Control Plan</b> every five years after the commencement date for the duration of the activity, or earlier if considered necessary by the DEC. The review shall be undertaken in consultation with the DEC and with advice from relevant specialists. On the basis of the review the co-proponents shall, as necessary, prepare a revised plan to be submitted to the DEC for approval.   | DECC & NPWS, North Head Quarantine Station Predator and Pest Animal Plan, October 2008, Version 4   | <b>The Predator and Pest Control Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since October 2008.</b><br><b>Review and update the Predator and Pest Control Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b>   | Non-compliant |
| <b>Environmental Management Plan</b> |  |   |  |               |
| 191                                  | An <b>Environmental Management Plan</b> (EMP) shall be prepared by the co-proponents and submitted for approval to the DEC and DIPNR, following a review by the Environmental Manager. Once approved, the co-proponents shall implement the EMP.   | DEC & NPWS, North Head Quarantine Station, Environmental Management Plan, May 2005, Version 12  | An Environmental Management Plan dated May 2005 was available for review.  | Compliant     |
| 192                                  | The EMP shall be prepared and approved prior to the commencement of construction works or new operation functions as described in the PAS. Operations already occurring on site prior to the commencement date may continue without an approved EMP, subject to other relevant conditions of this approval having been met. The EMP may be updated and amended with the approval of the DEC to incorporate other strategies, plans and programs required by the conditions of approval.  | DEC & NPWS, North Head Quarantine Station, Environmental Management Plan, May 2005, Version 12  | <b>No evidence was available to confirm the Environmental Management Plan had been approved, noting this requirement occurred prior to the audit period. The EMP does note that it was presented to the QSCCC on 16 December 2004.</b>   | Non-compliant |
| 193                                  | The primary function of the EMP is to outline environmental safeguards and procedures to be implemented during the construction and operation stages of the activity. The EMP may also function as an operational control document to guide the implementation of all aspects of the proposal. The EMP shall be prepared in accordance with: <ol style="list-style-type: none"> <li>the conditions of this approval;</li> <li>all relevant legislation;</li> <li>accepted environmental management best practice; and</li> <li>shall address all commitments and undertakings made by the co-proponents for environmental management.</li> </ol> | DEC & NPWS, North Head Quarantine Station, Environmental Management Plan, May 2005, Version 12  | The requirements of CoA 193 are addressed in Chapter 2, Section 2.2 of the EMP.  | Compliant     |
| 194                                  | The EMP shall contain, but not be limited to, the matters specified in Schedule 9 and in conditions 197), 199) and 203). Other strategies, plans and programs required by the conditions of approval may be incorporated into the EMP.   | DEC & NPWS, North Head Quarantine Station, Environmental Management Plan, May 2005, Version 12  | Noted<br>Refer to CoA 197, 199, 203 and Schedule 9.  | Compliant     |
| 195                                  | The EMP shall be reviewed and revised in consultation with the DEC as necessary to incorporate revisions to relevant site-wide strategies, plans and the results of the integrated monitoring program.   | DEC & NPWS, North Head Quarantine Station, Environmental Management Plan, May 2005, Version 12  | <b>The Environmental Management Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, since 2005. The EMP contains outdated legislative references and names of Government agencies, departments and stakeholders.</b><br><b>Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b>   | Non-compliant |



| Soil  |   |  |   |               |
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| 196   | Prior to any works commencing in areas of potential contamination the co-proponents must submit to the DEC a preliminary investigation prepared in accordance with the "Managing Land Contamination: Planning Guidelines" (DUAP & EPA 1998). After considering the assessment the DEC may require the co-proponents to undertake a detailed investigation in accordance with the Guidelines and/or undertake any necessary remediation work. Areas of potential contamination include those identified in Figure 13.1 of the EIS, the sites of former buildings P22 and H1, and any other areas identified by the co-proponents during the course of the activity.  | Auditee Interview 03/02/22<br>Site Inspection  | Mawland management reported that no works occurred in areas of potential contamination during the audit period.   | Not Triggered |
| 197   | As part of the EMP, the co-proponents shall prepare and implement an <b>Erosion and Sedimentation Control Plan</b> to be implemented for all works that involve ground surface disturbance. The plan will be prepared in accordance with the guideline "Managing Urban Stormwater – Soils and Construction" (DoH 1998), but with adaptations as necessary and appropriate for the Quarantine Station site.  | Mawland, Erosion and Sedimentation Control Plan, May 2005<br><a href="http://www.environment.nsw.gov.au">www.environment.nsw.gov.au</a>  | <b>Observation</b><br><b>The Erosion and Sedimentation Control Plan has not been updated since 2005 and does not reflect the current site conditions and works conducted since 2005.</b><br><b>Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b><br><br>The Erosion and Sedimentation Control Plan was available at: <a href="https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans">https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans</a> at the time of the audit.  | Compliant     |
| 198   | Regular inspections of temporary and permanent erosion and sedimentation control devices shall be undertaken during the undertaking of any works involving ground surface disturbance.  | Auditee Interview 03/02/22<br>Site Inspection<br>Beach Erosion Risk Assessment, 06/02/20<br>Site Induction, 26/03/21<br>Email – NPWS, Little Penguin AOBV - Removal of brush turkey blocking drain, 19/02/21 @08:25hrs | No works requiring temporary erosion and sediment controls were observed during the site inspection.<br><br>It was reported that inspections of erosion and sediment controls were undertaken by the NPWS Ranger and Environmental Manager during reconstruction of P21 and P23.<br><br>Sighted site induction dated 26 March 2021 and a risk assessment dated 6 June 2020 for sand replenishment works on Quarantine Beach following erosion events.<br><br>Sighted an email dated 19 February 2021 from NPWS concerning advice to remove an inactive brush turkey nest blocking a drain that had the potential to impact Little Penguin habitat.  | Compliant     |
| Noise |   |  |   |               |
| 199   | As part of the EMP, the co-proponents shall prepare and implement a <b>Noise Management Plan</b> for both the construction and operation phases of the activity. The plan should include, but not be limited to:<br><br>e) standards to be met, consistent with relevant EPA guidelines;<br>f) noise mitigation measures, including educational signage for visitors entering and exiting the site;<br>g) regular monitoring of both construction and operational activities. This is to include:<br>• noise generated from on-site activities, measured both within the site and off-site<br>• road traffic noise during peak periods of vehicle movements to and from the site, especially in the vicinity of residential areas along Darley Road and Manly Hospital; and<br>h) adaptive management measures. | Mawland, Noise Management Plan, May 2005<br><a href="http://www.environment.nsw.gov.au">www.environment.nsw.gov.au</a>   | <b>Observation</b><br><b>Given the Noise Management Plan is over 15 years old it is recommended that it be reviewed and updated where required to align with current legislation, legislative requirements as well as the current site conditions and management arrangements as well as any requirement from MP08_0041 MOD 03</b><br><br>There is no requirement to review the Noise Management Plan every five years unlike other plans required by MP08_0041; however, good management practice is to review plans periodically over their lifecycle.<br><br>The Noise Management Plan was available at: <a href="https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans">https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans</a> at the time of the audit. | Compliant     |

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| 200  | <p>Noise levels are to be managed and monitored in accordance with the approved Noise Management Plan. If relevant noise standards are exceeded the co-proponents shall take all reasonable steps to ensure that measures are put in place to meet the standards:</p> <ul style="list-style-type: none"> <li>a) for construction works, within 1 week of the exceedance being identified; and</li> <li>b) for operational activities, within 6 months of the exceedance being identified</li> </ul>  | <p>Site Inspection<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/><br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p>No external complaints were received during the audit period concerning noise.<br/><br/>Sound systems are fitted with noise limiters that cut the sound when a specified threshold is reached. Noisy events, such as wedding receptions, are generally held in building P27 in the Former Third Class Precinct. Sound systems were also observed in the Former Isolation Precinct and the Former First Class Precinct; however, these are generally used for conferences and also have noise limiters fitted. Only Q Station staff can reset the sound systems once the noise limiter is tripped.<br/><br/>Only piped/background music is played at the Boilerhouse before sunset.<br/><br/>One internal complaint was made on the evening of 10 July 2018 by a Penguin Warden concerning music and alleged dancing by Q Station staff during dining clean-up at the Boilerhouse. The warden was concerned the noise may impact the Little Penguins. It is understood that disciplinary action and refresher awareness was conducted for staff concerning the potential of their actions on the nearby Little Penguins.</p> | Compliant     |
| 201  | <p>Amplified music or noise on the site shall be managed on the following basis:</p> <ul style="list-style-type: none"> <li>a) any amplified music or noise or ambient dining music shall not exceed the LAeq noise level of 50 dB(A) as measured up to 20 metres away from the edge of the building in which the music or noise is being generated;</li> <li>b) outdoor amplification may only occur during the day period and must not exceed LAeq noise level of 50 dB(A), as measured at any point along the existing fence line (as at 2017) to the beach area ; and</li> <li>c) ambient dining music in the outdoor eating area adjacent to the Boilerhouse Restaurant (Building A6) during the evening and night time period is restricted to the following times: <ul style="list-style-type: none"> <li>i. March to April (inclusive): no restriction;</li> <li>ii. May to July (inclusive): not permitted at any time; and</li> <li>iii. August to February (inclusive): not permitted from sunset.</li> </ul> </li> </ul> | <p>Wilkinson Murray, Compliance Noise Monitoring – Quarantine Station, 28/05/19</p>  | <p>Sound systems are fitted with noise limiters that cut the sound when a specified threshold is reached. Noisy events, such as wedding receptions, are generally held in building P27 in the Former Third Class Precinct. Sound systems were also observed in the Former Isolation Precinct and the Former First Class Precinct; however, these are generally used for conferences and also have noise limiters fitted. Only Q Station staff can reset the sound systems once the noise limiter is tripped.<br/><br/>Only piped/background music is played at the Boilerhouse before sunset.<br/><br/>No external complaints were received during the audit period concerning noise.<br/><br/>The 2019 noise monitoring report notes that no maximum capacity events occurred within the 12 month period following approval of MOD 03. The COVID-19 pandemic in 2020 and 2021 has meant that maximum capacity has not been triggered during the audit period. Noise monitoring was conducted between 22 February 2019 and 10 March 2019.</p>  | Compliant     |
| 201A | <p>Within one year of the date of determination of Modification 3, the co-proponents shall provide a Noise Validation Report (NVR) to the satisfaction of the Secretary. The NVR shall:</p> <ul style="list-style-type: none"> <li>a) be prepared by a suitably qualified consultant;</li> <li>b) include noise monitoring results collected during the previous twelve months, including results from at least half of the maximum capacity events held with the twelve month period;</li> <li>c) verify compliance with the operational noise limits under Term 201;</li> <li>d) identify mitigation and/or management measures required to ensure compliance with the operational noise limits in Term 201;</li> <li>e) include detail of all complaints received by the site from the previous twelve months; and</li> <li>f) include details of ongoing periodic noise testing and complaints handling procedures.</li> </ul>   | <p>Wilkinson Murray, Compliance Noise Monitoring – Quarantine Station, 28/05/19<br/>Email – Mawland to DPIE, Q Station Modification Noise Report, 28/05/19 @10:28hrs<br/>Email – DPIE to Mawland, Q Station Modification Noise Report, 28/05/19, @14:42hrs</p>                         | <p>The 2019 noise monitoring report notes that no maximum capacity events occurred within the 12 month period following approval of MOD 03. The COVID-19 pandemic in 2020 and 2021 has meant that maximum capacity has not been triggered during the audit period. The report concluded that at ambient music levels did not exceed levels of approximately LAeq 35 dBA within the penguin nesting areas considering the shielding provided by the existing boundary fence. The report did not identify any requirements for noise mitigation or management measures to ensure compliance with the operational noise limits.<br/><br/>Sighted an email from the Department to Mawland dated 28 May 2019 confirming receipt of the noise report and requesting that that when further noise monitoring is undertaken for future high capacity events, details of the noise monitoring are submitted to the Department accordingly.</p>  | Compliant     |
| 202  | <p>Even if relevant industry and technical standards for noise management are met, the DEC may direct the co-proponents to take appropriate measures to reduce or alter noise levels, or to implement measures earlier than the time-frames specified in condition 200), after considering monitoring information for the Long-nosed Bandicoot and Little Penguin populations. The co-proponents shall comply with any such directions.</p>  | <p>Auditee Interview 03/02/22</p>  | <p>No directions were received during the audit period.</p>  | Not Triggered |

| Waste |   |   |   |           |
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| 203   | <p>As part of the EMP, the co-proponents shall prepare and implement a <b>Waste Management Plan</b> to address the handling, stockpiling and disposal of wastes and construction materials during all phases of the activity. The plan shall include, but not be limited to, the following:</p> <ul style="list-style-type: none"> <li>e) procedures to ensure that demolition and construction materials are stockpiled clear of environmentally sensitive areas;</li> <li>f) waste avoidance and reduction measures, including strategies for recycling and re-use of waste materials;</li> <li>g) procedures for the removal and disposal of waste at an appropriately licensed facility, including asbestos material;</li> <li>h) on-site education and signage to promote and encourage “no feeding” rules for wildlife and appropriate waste disposal procedures; and</li> <li>i) procedures for regular litter inspection and collection.</li> </ul> | <p>Mawland, Waste Management Plan, May 2005<br/> <a href="http://www.environment.nsw.gov.au">www.environment.nsw.gov.au</a></p> | <p><b>Observation</b><br/> <b>The Waste Management Plan has not been updated since 2005 and includes references to superseded legislation and guidelines.</b><br/> <b>Review and update the plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p> <p>There is no requirement to review the Waste Management Plan every five years unlike other plans required by MP08_0041; however, good management practice is to review plans periodically over the life of a project.</p> <p>It is noted that the plan included a table (pp.5-6) of buildings that contained asbestos. Given remedial works are likely to have occurred and some or, if not all, all of the asbestos containing materials removed this table will need to be reviewed and updated.</p> <p>The plan also refers to two areas identified as contaminated land in the 2001 EIS (p.6). This section would also require updating to reflect current site conditions.</p> <p>Map Information boards were observed to include infographics of a Minimal Impact Code that requires people to 'Dispose of all litter in bins provided' and 'Do not feed wildlife'.</p> <p>The Waste Management Plan was structured into waste management procedures for:</p> <ul style="list-style-type: none"> <li>• Conservation and adaptation works; and</li> <li>• Ongoing operations (accommodation, restaurant etc.).</li> </ul> <p>The Waste Management Plan was available at: <a href="https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans">https://www.environment.nsw.gov.au/research-and-publications/north-head-quarantine-station-management-plans</a> at the time of the audit.</p> | Compliant |
| 204   | <p>All handling, stockpiling and disposal of wastes and construction materials shall be undertaken in accordance with the Waste Management Plan and all necessary licenses, permits or other approvals must be obtained by the co-proponents.</p>   | Site Inspection   | <p>No construction activities were occurring at the time of the site inspection.</p> <p>Numerous waste bins were observed across the Q Station. Bins are stored at the CP5 maintenance area.</p> <p>The main kitchen and plate-up kitchens have their own separate grease traps that are emptied as needed by a tanker and taken off-site for disposal at an appropriately licensed waste facility.</p> <p>Refer to photographs in Appendix F.</p>  | Compliant |

| Site Management |   |   |   |               |
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| 205             | <p><b>Emergency and Evacuation Plan</b></p> <p>Prior to the commencement date the co-proponents shall submit an <b>Emergency and Evacuation Plan</b> for the site to the DEC for approval. The plan will be prepared in consultation with the NSW Ambulance Service, NSW Police and NSW Fire Brigade and shall address, but not be limited to:</p> <ul style="list-style-type: none"> <li>s) emergency and/or evacuation procedures for a range of incidents, including spillages, boat collisions, fire, bomb threats, power blackout, personal injury, disturbance to human burial sites, etc;</li> <li>t) interim site fire safety measures to be provided until the upgrade of the fire hydrant system has been completed (condition 211);</li> <li>u) safety and emergency signage;</li> <li>v) an emergency alarm system;</li> <li>w) the location of evacuation points and an evacuation procedure;</li> <li>x) regular testing of the system;</li> <li>y) emergency equipment and appropriate storage locations;</li> <li>z) staff training; and</li> <li>aa) emergency contact details for relevant staff. Once approved, the co-proponents shall implement the plan.</li> </ul> | <p>Mawland, Visitor Management Plan, March 2005</p> <p>Visitor Access Strategy<br/>Security Plan<br/>Emergency Evacuation Plan</p> <p>Helex Zone, Q Station Emergency Manual, 18/02/19</p> <p>Auditee response to draft Audit Report, 08/03/22</p>  | <p><b>Observation</b></p> <p><b>It was not clear how the Emergency Manual (2019) aligned with the Emergency Evacuation Plan (2005).</b></p> <p><b>Review both documents to ensure there is no duplication of requirements. Confirm which document addresses the requirements of CoA 205.</b></p> <p><b>Observation</b></p> <p><b>A spill kit was observed to be obstructed by cleaning equipment in Building A23. Refer to Appendix F.</b></p> <p><b>Mawland and NPWS provided a consolidated response to the draft Audit Report on 8 March 2022. In this response Mawland stated that this deficiency had been rectified.</b></p> <p>An Emergency Manual prepared by Helex Zone Pty Ltd dated 18 February 2019 was available for review. The manual included, but was not limited to procedures for crowd control, explosive devices, power outages and gas leak.</p> <p>Sighted the Visitor Management Plan dated March 2005 that also included the Visitor Access Strategy, Security Plan and Emergency and Evacuation Plan. The Visitor Management Plan was approved by the Department on 10 August 2005 (p.5).</p> <p>On 17 October 2020 a planned hazard reduction burn at North Head spotted over containment lines and resulted in the Q Station being evacuated. Typically, following a significant incident or near miss management plans are reviewed to determine if controls and procedures are effective and to include any lessons learnt.</p> | Compliant     |
| 206             | All staff shall be made aware of the plan and its provisions and be trained in the operation of emergency equipment. Records of staff training will be kept by the co-proponents and included as part of the annual environmental report (see condition 221).   | Auditee Interview 03/02/22  | Staff take part in an evacuation training during the induction and receive appropriate training specifically for the area of engagement. A record of this is held by the Q Stations HR team   | Compliant     |
| 207             | The plan is to be displayed at prominent locations within the site and is to clearly highlight the recommended actions and 24 hour telephone contacts for emergency situations.   | Site Inspection   | Evacuation notices were observed in various buildings during the site inspection. Notices included recommended actions and 24 hour telephone contacts for emergency situations. Refer to photographs in Appendix F.   | Compliant     |
| 208             | The co-proponents shall undertake a review of the plan every five years after the commencement date for the duration of the activity or earlier if considered necessary by the DEC. The review shall be prepared in consultation with the agencies specified in condition 205). On the basis of the review the co-proponents shall, as necessary, prepare a revised Emergency and Evacuation Plan to be submitted to the DEC for approval.  | <p>Mawland, Visitor Management Plan, March 2005</p> <p>Visitor Access Strategy<br/>Security Plan<br/>Emergency Evacuation Plan</p>  | <p><b>The Emergency and Evacuation Plan had not formally been reviewed by both co-proponents and approved, on the basis of the review, by the Department since March 2005.</b></p> <p><b>Review and update the Emergency and Evacuation Plan where required so that it aligns with current legislative requirements as well as site conditions and arrangements, roles and responsibilities and objectives and targets.</b></p>   | Non-compliant |
| 209             | <p><b>Fire Safety</b></p> <p>The co-proponents shall prepare a fire safety schedule for each building on the site. The schedule shall be submitted to DEC for approval prior to occupation or use of a building on the site for the activity. The schedule shall be prepared in accordance with the NPWS Construction Assessment &amp; Approvals Procedure and the following specific requirements:</p> <ul style="list-style-type: none"> <li>a) be prepared by a Fire Protection Consultant with at least 5 years experience;</li> <li>b) identify fire safety services to be installed (including type of service, location and other specifications) to meet BCA standards (or an acceptable alternative);</li> <li>c) identify interim fire safety measures that could be implemented to allow the use of buildings in the short term; and</li> <li>d) provide a statement outlining the potential impact of the work on the heritage significance of the building, and proposed mitigative measures.</li> </ul>   | <p>Auditee Interview 03/02/22</p> <p>Helex Zone, Q Station Emergency Manual, 18/02/19</p> <p>Form Architects, Log Book Photographic Record, Buildings P21 and P23 – Construction Stage, August 2019</p> <p>Crown Completion Certificate No..P217_186-2, 18/07/19</p> <p>Q Station P Buildings Smoke Alarm Map [no date]</p> | <p>Buildings P21 and P23 were the only new buildings constructed during the audit period.</p> <p>It is understood that a fire safety schedule was submitted and approved as part of the New Works Certificate issued by NPWS to Mawland for P21 and P23 on 20 December 2018; however, this was not available for review.</p> <p>Sighted an Application of Completed Works Certificate in the log book for Buildings P21 and P23.</p> <p>Sighted Crown Completion Certificate No..P217_186-2 dated 18 July 2019 that confirmed Buildings P21 and P23 [appear] to have been constructed to comply with the intent of the Building Code of Australia (BCA), Volume 1, 2016.</p> <p>Sighted a smoke alarm map for all P numbered buildings and a fire panels map for the Q Station.</p>   | Compliant     |



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| 210                       | No building on the site shall be occupied or used after the commencement date until such time as fire safety measures have been implemented and an interim or final Fire Safety Certificate issued in accordance with the NPWS Construction Assessment and Approvals Procedure. This includes any purposes that were being undertaken prior to the commencement date. In the event of any inconsistency this condition shall prevail over any other condition of approval (with the exception of condition 50).   | Auditee Interview 03/02/22<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21  | It is understood that a fire safety schedule was submitted and approved as part of the New Works Certificate issued by NPWS to Mawland for P21 and P23 on 20 December 2018; however, this was not available for review.  | Compliant     |
| 211                       | The co-proponents shall also undertake the following fire safety measures:<br>a) all buildings are to be brought up to BCA standards for fire safety (or an acceptable alternative). This shall occur in stages to match the staging plan for works, as amended by condition 31);<br>b) an upgrade of the fire hydrant system to meet NSW Fire Brigade standards shall be completed within 5 years of the commencement date. In the meantime, the co-proponents shall ensure that the fire measures detailed in the emergency and evacuation plan (condition 205) are in place and functioning;<br>c) an annual fire safety statement of the site buildings, prepared in accordance with the NPWS Construction Assessment & Approvals Procedure, shall be submitted for DEC approval; and<br>d) the co-proponents shall comply with the terms of any fire safety order issued by or on behalf of the DEC. | Auditee Interview 03/02/22<br>Site Inspection<br>Airmaster Corporation Pty Ltd t/a Celsius Fire, Asset Record – Job No. 614389, 31/01/22<br>Q Station P Buildings Smoke Alarm Map [no date]<br>Fire Panels Map  | <b>Observation</b><br><b>The Auditor notes that requirements a) and b) are understood to have occurred prior to the audit period and have been assumed to have been addressed at the time specified and were therefore not assessed as part of this audit.</b><br><b>An Annual Statement of Maintenance Compliance for January 2021 – January 2022 was sighted. It confirms that maintenance was carried out in accordance with AS1851.</b><br><b>However: The Annual Statement of Maintenance Compliance notes that 'This is not an Annual Fire Safety Statement. As we are not the owner or agent for this building, we are unable to provide an Annual Fire Safety Statement. This statement will give you the information required to complete your own Annual Fire Safety Statement.' Therefore the Annual Statement of Maintenance Compliance does not satisfy requirement c) of this condition.</b><br><b>The Auditor is not aware as to whether any Annual Fire Safety Statement has been submitted to NPWS, nor whether that Statement has been approved, orders issued, by the NPWS.</b><br>Celsius Fire is the main contractor providing monthly and sixth monthly inspections on fire management equipment. This includes fire extinguishers, fire hose reels, smoke and fire alarms in rooms and a sprinkler system to buildings from P1-P12. The central fire hydrant system is also tested. Fire hydrants, hose reels and fire extinguishers were observed during the site inspection. Sighted an asset register for automatic fire suppression systems to Buildings A20, A11, H4, H1, P27, H7, P12, P11, P10, P9 and P1. The register notes that a monthly service of fire equipment was conducted.<br>Sighted a smoke alarm map for all P numbered buildings and a fire panels map for the Q Station. | Compliant     |
| 212                       | <b>Bushfire Management Plan</b><br>The co-proponents are 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.   | SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21 | <b>Observation</b><br><b>The Bushfire Management Plan should be reviewed and updated in consultation with relevant authorities.</b><br>The Annual Environmental Reports for 2018-2019 and 2020 note that a Bushfire Assessment was prepared for the site in July 2006 by Fire Base Consulting Pty but that no update had occurred since that time.<br>On 17 October 2020 a planned hazard reduction burn at North Head spotted over containment lines and resulted in the Q Station being evacuated. Typically, following a significant incident or near miss management plans are reviewed to determine if controls and procedures are effective and to include any lessons learnt.   | Compliant     |
| <b>Hours of Operation</b> |   |   |  |               |
| 213                       | All construction activities, including entry and departure of heavy vehicles, shall be restricted to the following hours:<br>a) <b>during daylight savings (ie. summer)</b> - 7am – 6pm Monday to Friday, 8am-1pm Saturday;<br>b) <b>at other times (ie. winter)</b> - 7am – 5pm Monday to Friday, 8am-1pm Saturday; and<br>c) <b>Sundays or public holidays</b> - no work is to be undertaken, except for emergency works or minor, low noise activities such as painting.   | Auditee Interview 03/02/22<br>Site Inspection<br>Complaints Register Current to 2021  | No construction activities were occurring at the time of the audit and site inspection.  | Not Triggered |



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| 214                                    | <p>The hours of operation for specific uses shall be as follows:</p> <ul style="list-style-type: none"> <li>a) <b>restaurant in A6</b> – closed to the public by 11.00 pm;</li> <li>b) <b>conferences and functions</b> – no organised visitor activity past 11.00 pm; and</li> <li>c) <b>night tours</b> – the 1918 Night Experience sound and light show to conclude by 11.00 pm. The Late Ghost Tour to conclude by 12.00 midnight.</li> </ul>   | <p>Site Inspection<br/>Complaints Register Current to 2021<br/>Digital Compendium via QR Code</p>  | <p>The Q Station was being operated in accordance with the hours of operation. No complaints were received during the audit period concerning hours of operation.</p> <p>Hours of operation for tours and restaurants are provided in the digital compendium provided at check-in and available via a QR Code on smartphone or tablets.</p> <p>An internal complaint noted a miss-advertised Ghost Tour finishing time.</p> | Compliant     |
| 215                                    | <p>Service providers and contractor vehicles may only access and exit the site between 7.00 am and 12.00 pm (mid-day). This does not apply to vehicles involved in the undertaking of construction or conservation works.</p>   | <p>Auditee Interview 03/02/22<br/>Site Inspection</p>  | <p>Hours of operation are provided to services providers and contractors upon induction.</p>  | Compliant     |
| <b>Monitoring and Auditing Program</b> |   |  |   |               |
| 216                                    | <p><b>Monitoring</b></p> <p>Within twelve months of the commencement date an integrated monitoring program for the activity shall be prepared by the co-proponents and submitted for approval of DEC and DIPNR. The program shall be prepared in consultation with the Heritage Council and other relevant authorities. Implementation of the program shall commence no later than three months from the date of approval of the program. The primary aim of the program shall be to monitor over time the effects of the activity on the significance of the Quarantine Station site and immediately adjoining areas (such as Quarantine Beach and the Wharf), and to identify the need to develop and implement strategies to respond to any adverse impacts identified. An integrated monitoring program shall be implemented for the life of the activity and shall address:</p> <ul style="list-style-type: none"> <li>e) the feature or issue to be monitored;</li> <li>f) how the monitoring will be undertaken (eg. methods) and who will undertake this work;</li> <li>g) frequency of monitoring; and</li> <li>h) a process for reviewing the results of monitoring and identifying measures to be implemented to respond to impacts, and/or to meet the requirements of the approval.</li> </ul> | <p>Auditee Interview 03/02/22<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/>Email – UTS to Mawland, QStation-IMAMS Review, 03/02/14 @ 15:11hrs</p> <p>Matters are managed on an ad-hoc basis rather than an up-to-date cohesive and systematic process that describes how the monitoring will be undertaken, who will do the monitoring and when, and the process for reviewing the results of monitoring. The results of monitoring that is conducted is provided as a standalone report that does not track and trend the data year-on-year to facilitate management decisions.</p> <p>NPWS engage external consultants to undertake monitoring of threatened species including Long-nosed Bandicoots, Little Penguin and threatened flora.</p> <p>A draft, proposed new monitoring program prepared by the University of Technology Sydney (UTS) in 2014 was available for review. The review was triggered following the 2011 environmental audit which identified that a number of specific indicators should be modified or removed as their relevance to current operations was questionable; however, approval and implementation of the proposed program was never agreed between the co-proponents.</p> | <p><b>An Integrated Monitoring Program had not been implemented for the Q Station during the audit period.</b></p> <p><b>Develop and implement an Integrated Monitoring Program in accordance with the requirement of CoA 216.</b></p>  | Non-compliant |

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| 217 | <p>The program shall include, but is not limited to, the following matters:</p> <ul style="list-style-type: none"> <li>m) visitor access information – see conditions 135) and 156);</li> <li>n) the interpretive program, and whether it is achieving its goals (to include consideration of quality of visitor experience, visitor understanding and presentation performance) (condition 100);</li> <li>o) Aboriginal heritage – including the condition of physical sites (condition 70);</li> <li>p) non-Aboriginal heritage – including the condition of buildings and structures, landscape features, moveable heritage and conservation works progress (conditions 78) and 85);</li> <li>q) flora and fauna - including general monitoring during construction and operation phases, as well as specific strategies for monitoring threatened species, including the Little Penguin and the Long-nosed Bandicoot (conditions 167) and 177)-178);</li> <li>r) seagrasses (condition 184);</li> <li>s) soil and erosion (conditions 197)-198);</li> <li>t) noise (condition 199);</li> <li>u) stormwater management, including water quality (condition 104)</li> <li>v) infrastructure – consumption and capacity (water, sewer, gas, etc – condition 105);</li> <li>w) waste management (condition 203); and</li> <li>x) staff and contractor training – including induction programs (conditions 64) and 65) and emergency training (condition 206)</li> </ul> | <p>Auditee Interview 03/02/22<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br/> Matters are managed on an ad-hoc basis rather than an up-to-date cohesive and systematic process that describes how the monitoring will be undertaken, who will do the monitoring and when, and the process for reviewing the results of monitoring. The results of monitoring that is conducted is provided as a standalone report that does not track and trend the data year-on-year to facilitate management decisions.<br/> The Integrated Monitoring and Adaptive Management System (IMAMS) is not generally implemented.<br/> Refer to CoA 216.</p> | <p><b>An Integrated Monitoring Program had not been implemented for the Q Station to address the requirements of CoA 217 during the audit period.</b></p>  | Non-compliant |
| 218 | <p>On the basis of the outcomes of the integrated monitoring program, the co-proponents shall, subject to DEC and any other approvals required as specified in the conditions of approval, use the adaptive management system to adjust the undertaking of the activity to conserve the significance of the site.</p>   | <p>Auditee Interview 03/02/22<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p>   | <p>An Integrated Monitoring Program has not been developed for the Q Station therefore this requirement has not been triggered during the audit period.</p>  | Not Triggered |
| 219 | <p>As part of the annual environmental report (condition 221) and comprehensive audit (condition 226), the co-proponents shall produce a monitoring report outlining results from the integrated monitoring program. The report shall:</p> <ul style="list-style-type: none"> <li>a) include an analysis of monitoring results and trends collected over time; and</li> <li>b) identify measures taken or proposed to be undertaken to respond to any adverse or unexpected impacts identified.</li> </ul>  | <p>Mawland, Monitoring Report North Head Quarantine Station July 2018 – December 2019<br/> Mawland, Monitoring Report North Head Quarantine Station January 2020 to December 2020</p>  | <p>The Integrated Monitoring Report was included as Appendix E to the 20218-2019 Annual Environmental Report and Appendix F to the 2020 Annual Environmental Report; however, it is not clear how these reports were prepared given there is no integrated monitoring program.<br/> <b>An Integrated Monitoring Report has not been provided for inclusion in this Audit Report. The auditees advise that monitoring reports have been provided to the Department separately and the Department raised comments on their content. The Auditor has not seen the Department’s comments.</b><br/> <b>The auditees advise that they are working on the reports to address the Department’s comments.</b></p> | Non-compliant |

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| 220 | The co-proponents shall undertake a regular review of the overall integrated monitoring program concurrent with or prior to the ongoing comprehensive audits of the activity (condition 228). The review shall be undertaken in consultation with the relevant authorities. On the basis of the review the co-proponents shall, as necessary, prepare a revised program to be submitted to the DEC and DIPNR for approval.                        | Auditee Interview 03/02/22<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21   | <b>An Integrated Monitoring Program has not been developed for the Q Station during the audit period.</b><br>Refer to CoA 216.<br>The Integrated Monitoring and Adaptive Management System (IMAMS) is not generally implemented.  | Non-compliant |
| 221 | <b>Annual Environmental Report</b><br>An annual environmental report for the activity shall be prepared by the co-proponents and submitted to the DEC, DIPNR, NSW Heritage Council, Waterways Authority, NSW Fisheries and the Quarantine Station Community Committee for comment. In reviewing the annual environmental report these organisations are to specifically consider issues associated with visitor impacts arising from the activity | Letter - SNC Lavalin, Q Station Annual Environment Reports - Invitation to review reports and provide comments, 15/12/21, Ref: SN0243077<br>Letter – DPIE to NPWS, North Head Quarantine Station (MP08_0041) Monitoring and Auditing Program – DIRECTION, Ref: INV-1624452, 08/11/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br>Emails NPWS, Mawson, DPE, 27/04/21 – 30/04/21. | Sighted a letter from SNC Lavalin, dated 15 December 2021 that invited the QSCCC to review the Annual Environment Reports for the Quarantine Station (Q Station) which cover the reporting periods, from July 2018 – December 2019 and January 2020 – December 2020.<br>Direction 3 from the Department to NPWS dated 8 November 2021 that noted that the Department considered that the annual environmental report and comprehensive audit report required under MP08_0041 would benefit from being prepared consistent with the current Post Approval Requirements. Therefore, NPWS were requested to prepare by 21 January 2022 an annual environmental report consistent with the <i>Department's Compliance Reporting Post Approval Requirements (2020)</i> for the periods 1 July 2018 to 31 December 2019 and 1 January 2020 to 31 December 2020. The letter from the Department notes that annual environmental reports were supplied to the Department on 30 April 2021 for the period following the 2018 comprehensive audit.<br>In accordance with the direction provided by the Department in their letter to NPWS on 8 November 2021 the following environmental reports were available for review:<br><ul style="list-style-type: none"> <li>1 January 2020 to 31 December 2020.</li> <li>1 July 2018 to 31 December 2019.</li> </ul> <b>According to correspondence between NPWS, Mawland and the Department in April 2021 (and as per the Department's comments on the draft Audit Report), Annual Environmental Reports for 2019 and 2020 were not submitted until after the Department wrote to the co-proponents in April 2021.</b> | Non-compliant |
| 222 | In submitting the report in accordance with condition 221), the co-proponents shall identify a timeframe for the receipt of comments. As a minimum, the organisations listed in condition 221) shall have 4 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 co-proponents                                | SNC Lavalin, Comments Template for Q Station Annual Environmental Reports, TfNSW  | Sighted a comments template that included comments from TfNSW concerning the 2018-2019 and 2020 Annual Environmental Reports. The template requested comments be provided by 14 January 2022.   | Compliant     |
| 223 | The co-proponents shall submit the first environmental report approximately 12 months after the commencement date, although this may be adjusted if agreed by the DEC to match the end of the calendar or financial years or to coincide with the staging plan (condition 31), and at annual intervals thereafter. No annual report is required in the year that a comprehensive audit is due (condition 228).                                    | SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21<br>Letter – DPIE to NPWS, North Head Quarantine Station (MP08_0041) Monitoring and Auditing Program – DIRECTION, Ref: INV-1624452, 08/11/21<br>Emails NPWS, Mawson, DPE, 27/04/21 – 30/04/21.   | In accordance with the direction provided by the Department in their letter to NPWS on 8 November 2021 the following environmental reports were available for review:<br><ul style="list-style-type: none"> <li>1 January 2020 to 31 December 2020.</li> <li>1 July 2018 to 31 December 2019.</li> </ul> The comprehensive audit was commissioned in 2021. The previous comprehensive audit was conducted in 2018.<br><b>According to correspondence between NPWS, Mawland and the Department in April 2021 (and as per the Department's comments on the draft Audit Report), Annual Environmental Reports for 2019 and 2020 were not submitted until after the Department wrote to the co-proponents in April 2021.</b>  | Non-compliant |

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| 224 | <p>The annual environmental report shall:</p> <ul style="list-style-type: none"> <li>d) state how the co-proponents have complied with relevant approval conditions;</li> <li>e) include the outcomes of the annual monitoring report (condition 219);</li> <li>f) state any measures taken or proposed by the co-proponents to respond to issues arising from: <ul style="list-style-type: none"> <li>• the integrated monitoring program</li> <li>• consultations with the community; and</li> </ul> </li> <li>g) state any recommendations from the co-proponents regarding the undertaking of the activity, if considered necessary.</li> </ul> | <p>Letter – DPIE to NPWS, North Head Quarantine Station (MP08_0041) Monitoring and Auditing Program – DIRECTION, Ref: INV-1624452, 08/11/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p><b>Observation</b></p> <p><b>Direction 3 from the Department to NPWS dated 8 November 2021 noted that the Department did not consider that the annual environmental reports supplied [to the Department] on 30 April 2021 satisfied the relevant Approval conditions (CoA 221 to CoA 225) and directed NPWS to submit by 21 January 2022 revised annual environmental report for the periods 1 July 2018 to 31 December 2019 and 1 January 2020 to 31 December 2020.</b></p> <p>Revised reports were for the respective periods were prepared dated 15 December 2021 and appeared to address the requirements of CoA 224.</p>   | Compliant     |
| 225 | <p>The co-proponents shall take all reasonable steps to comply 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. The co-proponents shall also consider the recommendations and comments of the Quarantine Station Community Committee and provide a response to the Committee.</p>   | <p>Letter – DPIE to NPWS, Quarantine Station North Head (MP08_0041) Approval of independent auditor, 30/11/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21</p> <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p>                               | <p>Direction 3 from the Department to NPWS dated 8 November 2021 requested to prepare by 21 January 2022 an annual environmental report consistent with the <i>Department's Compliance Reporting Post Approval Requirements (2020)</i> for the periods 1 July 2018 to 31 December 2019 and 1 January 2020 to 31 December 2020.</p> <p>Revised reports were for the respective periods were prepared dated 15 December 2021.</p> <p>Evidence of submission to the required stakeholders was not available for review.</p>   | Compliant     |
| 226 | <p><b>Audit</b></p> <p>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.</p>  | <p>Letter – DPIE to NPWS, Quarantine Station North Head (MP08_0041) Approval of independent auditor, 30/11/21</p>  | <p>The auditors for the 2018-2021 comprehensive audit were approved by the Department in a letter to NPWS dated 30 November 2021. In their letter the Department noted that the auditors were suitably qualified, experienced and independent.</p> <p>This comprehensive audit had been prepared consistent with the IAPAR and AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems which supersedes the two ISO documents referenced in CoA 226.</p>  | Compliant     |
| 227 | <p>The co-proponents shall meet the cost of the comprehensive audit. The appointment of the auditor shall be approved by the DEC and DIPNR.</p>   | <p>Letter – DPIE to NPWS, Quarantine Station North Head (MP08_0041) Approval of independent auditor, 30/11/21</p>  | <p>The co-proponents engaged WolfPeak for the 2018-2021 comprehensive audit.</p> <p>The auditors for the 2018-2021 comprehensive audit were approved by the Department in a letter to NPWS dated 30 November 2021.</p>   | Compliant     |
| 228 | <p>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).</p>   | <p>Letter – DPIE to NPWS, Quarantine Station North Head (MP08_0041) Approval of independent auditor, 30/11/21</p> <p>SNC Lavalin, Compliance Audit Report Quarantine Station North Head, Ref: SNC-140410-q station audit report-20181212-rev 2</p>   | <p>The first comprehensive environmental audit was undertaken during the construction phase of the project in April 2007 by GHD Pty Ltd.</p> <p>This audit covers the period from 1 July 2018 to 31 December 2021. While CoA 228 requires a comprehensive audit every five years, the previous audit report (SNC Lavalin, 2018) provided for an "additional year and a half to the EOFY 2018". Accordingly, Direction 3 reduces the current audit period by a year and a half.</p> <p><b>The 2018 Independent Audit was not undertaken within 5 years of the preceding audit (completed in 2011). The 2018 Report notes that 'The extension for the audit to include the additional year and a half to the EOFY 2018 has been requested by NPWS due to a delay in modifications to planning approvals'. The 2011 Report does not capture this as a non-compliance. The Auditor is not aware of any such extension having been granted by the Department.</b></p> | Non-compliant |



|     |   |  |   |               |
|-----|---|--|---|---------------|
| 229 | <p>The audit shall address, but not be limited to:</p> <ol style="list-style-type: none"> <li>the environmental performance of the activity and its effects on the environment;</li> <li>compliance by the co-proponents with the approval conditions;</li> <li>the adequacy of the integrated monitoring program and EMP;</li> <li>the adequacy of measures taken or proposed by the co-proponents to respond to issues arising from: <ul style="list-style-type: none"> <li>the integrated monitoring program; and</li> <li>consultations with the community;</li> </ul> </li> <li>consideration of the key impact predictions made in the EIS and PAS using information from the integrated monitoring program;</li> <li>the adequacy and functioning of the information management and GIS system (once in place – conditions 66)-69); and</li> <li>any other matters considered necessary by the DEC, Heritage Council, Waterways Authority or DIPNR.</li> </ol> <p>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.</p> | Letter – DPIE to NPWS, North Head Quarantine Station (MP08_0041) Monitoring and Auditing Program – DIRECTION, Ref: INV-1624452, 08/11/21   | <p>A letter from the Department to NPWS dated 8 November 2021 noted that the Department had reviewed the most recent comprehensive audit report against the requirements of the IAPAR and considered that the report would benefit from being prepared consistent with the IAPAR. The Department therefore directed NPWS to submit:</p> <ul style="list-style-type: none"> <li>By 30 November 2021 a suitably qualified and experienced independent auditor consistent with Condition 227 of the Approval and the Independent Audit Post Approval Requirements (2020).</li> <li>By 1 June 2022 prepared consistent with Conditions 226-233 of the Approval and the Independent Audit Post Approval Requirements (2020), a comprehensive audit report for the period 1 July 2018 to 31 December 2021.</li> </ul> <p>This comprehensive audit has been prepared in accordance with the requirements of CoA 229 and the IAPAR. Recommendations to improve the environmental performance of the activity are provided in this Report.</p> | Compliant     |
| 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.   | This Report  | The comprehensive audit draft report was submitted to the co-proponents and the organisations listed in CoA 230 for comment.  | Compliant     |
| 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.   | This Report  | Given the deadline for submission of the final report to the Department of 1 June 2022 organisations listed in CoA 230 were given six weeks to provide comment starting from the date they received the draft report.   | Compliant     |
| 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.  | <p>This Report</p> <p><a href="http://www.qstation.com.au">www.qstation.com.au</a></p> <p>SNC Lavalin, Compliance Audit Report, Quarantine Station, North Head, 2018, Ref: snc-140410-q station audit report-20181212-rev 2</p>  | <p>The Auditor considered comments received from the organisations listed in CoA 230 and incorporated these into the report where appropriate and justified.</p> <p>The previous comprehensive audit report was available on the Q Station website (Our Story page).</p>  | Compliant     |
| 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.   | <p>SNC Lavalin, Compliance Audit Report, Quarantine Station, North Head, 2018, Ref: snc-140410-q station audit report-20181212-rev 2</p> <p>Mawland, Monitoring Report North Head Quarantine Station July 2018 – December 2019</p> <p>Mawland, Monitoring Report North Head Quarantine Station January 2020 to December 2020</p> | <p>It is understood that following the submission of the previous comprehensive audit report (2018) there were no significant revisions to the undertaking of the activity or mitigative measures required to protect the significance of the site.</p> <p>The Auditor notes that Mawland commented in the 2018-2019 and 2020 Monitoring Reports that it has raised concerns with the Department concerning the complexity of the approval and has provided suggested changes. The changes were not available to the Auditor for review.</p>  | Not Triggered |



| Requirement   | Evidence  | Findings and Recommendation | Compliance Status                                       |               |
|---|---|-----------------------------|---|---------------|
| SCHEDULE 2  |   |                             |   |               |
| <b>Elements of Activity Not Approved (Condition 17)</b>                             |   |                             |   |               |
| The following aspects of the activity are not approved as part of this application: |   |                             |   |               |
|   | -   | -                           | -   |               |
| <b>Wharf Precinct</b>   | <b>Element refused and additional comments</b>  |                             |   |               |
| Concrete stormwater pipe at Quarantine Beach.                                       | The proposed alterations are not approved as there is insufficient information in the current application to assess the potential environmental impacts   | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| Open area between A7, A8 and A11-12   | Power poles - the removal of overhead power poles is not approved, except where they are to be replaced with new poles of a similar size and materials (DACMP CPP 16.8.2).  | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| A12   | The interior wall and ceilings of A12 are not to be re-painted but may be sealed to prevent deterioration.  | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| First Cemetery  | The placement of symbolic surface markers is not approved. Interpretation of the cemetery should not overtly herald its presence to people moving through the site (Landscape Data Sheet L01, L01a).  | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| <b>Administration Precinct</b>  | <b>Element refused and additional comments</b>  |                             |   |               |
| Building S2   | The extension to the timber verandah is not approved as this would adversely alter the external configuration of the building, which makes a strong aesthetic contribution to the centre and core areas of the site (DACMP Building Data Sheet S02).<br>However, if the preparation of detailed design plans for the building indicates that alterations to the verandah are necessary to accommodate disabled access, then these may occur subject to approval of the design and construction plans.<br>Refer also Schedule 3. | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| Building S4   | Changes to the bathroom fitout are not approved as it is a rare surviving fitout of an early bathroom on the site. Any adaptation of the bathroom must retain the fabric specified in DACMP Building Data Sheet S04.<br>Reconstruction of the verandah based on research may occur.   | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| Building S10  | Demolition of the verandah structure is not approved, however removal of the AC infills may occur, consistent with DACMP Building Data Sheet S10.   | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| Building S12  | The conversion of the laundry to a bathroom is not approved as it is a largely intact and rare example on the site (DACMP Building Data Sheet S12).   | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| <b>First and Second Class Precincts</b>   | <b>Element refused and additional comments</b>  |                             |   |               |
| Eastern perimeter of road through First and Second Class                            | Power poles – the removal of overhead power poles is not approved, except where they are to be replaced with new poles of a similar size and materials (DACMP CPP 16.8.2).  | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |
| Gravel path from P12 to top of the Funicular stairway                               | The proposal gravel path (as shown in Figure 2.1 of the PAS) is not approved, as this is an area of potential foraging habitat for Long-nosed Bandicoots and in accordance with DACMP Policy GCP13.3.29.  | Site Inspection             | This action was not undertaken during the audit period. | Not Triggered |

| Requirement   | Evidence   | Findings and Recommendation  | Compliance Status   |               |
|---|--|--|---|---------------|
| SCHEDULE 3  |  |  |   |               |
| <b>Aspects of the proposal approved subject to modification or detailed design</b>  |  |  |   |               |
| The following aspects of the proposal are approved, subject to achievement of the specific outcomes and objectives shown in the table and: <ul style="list-style-type: none"> <li>compliance with the Quarantine Station Archaeological Management Plan (AMP);</li> <li>any necessary approvals being obtained from the NSW Heritage Council; and</li> <li>compliance with the NPWS Construction Assessment and Approvals Procedure.</li> </ul> | -  | -  | -   |               |
| <b>Cross-precinct issues</b>  | <b>Specific outcomes/objectives</b>  |  |   |               |
| Various buildings: methods for cooling and heating rooms  | <ul style="list-style-type: none"> <li>Rooms to be used for dining, kitchens, function and conference related purposes, as well as archival or records storage and administration may include appropriate contemporary technologies for cooling and heating, which includes installation of room air-conditioning in accordance with Heritage Council approval dated 2 March 2017 that can be reversed at any time.</li> <li>Ceiling fans may be installed on other buildings, with preference to fans mounted over the ceiling light to minimize fabric impact.</li> <li>Details of any proposed cooling and heating systems shall be included in the construction works application for the particular building. The application must demonstrate that the proposed system: <ul style="list-style-type: none"> <li>Will have as little adverse impact on significant fabric as practicable;</li> <li>Will not have significant adverse visual impacts; and</li> <li>Is clearly capable of being removed, and fabric reinstated, at some future point consistent with the principle reversibility.</li> </ul> </li> </ul> | Site Inspection<br>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21 | The 2018-2019 Annual Environmental Report notes that a New Works Certificate was issued by NPWS on 23 November 2018 to Mawland for the air conditioning works to be completed following completion and a review of the work against all relevant approvals and the CoPA. Works were carried out in the following buildings A28/ 29, A11, P5, P15, P27 and S7. Works were approved by the Heritage Council on 2 March 2017   | Compliant     |
| Road Repairs  | <i>No timber kerbs are to be installed as this is contrary to the DACMP policy GCP 13.3.43, which states that new retaining walls (this includes kerbs) should be sympathetic to neighboring examples in terms of scale, material and texture.</i>   | Site Inspection  | No timber kerbs were observed during the site inspection. No road repairs were conducted during the audit period.   | Not Triggered |
| Lower Reservoir – water reservoirs/tanks  | Full details of the proposed design and layout of the water reservoirs and associated infrastructure are to be submitted to the DEC. This shall include evidence of consultation with Sydney Water (condition 16).   | Site Inspection  | <p><b>Observation</b></p> <p><b>The fence to the open reservoir on Entrance Road was observed to be broken. Given the Q Station is open to the public there exists the potential for a person to enter the reservoir area. No signs warning of the water hazard were observed. No lifebuoys or other water rescue equipment or means of egress were observed in the vicinity of the reservoir.</b></p> <p><b>Evidence the fence to the open reservoir had been repaired and a sign warning of deep water was provided to the Auditor on 10 February 2022. Refer to Appendix F.</b></p> <p>No works associated with this requirement were conducted during the audit period. The lower reservoir was not accessed during the site inspection for safety reasons.</p> | Not Triggered |
| Excavation and installation of second water network for fire purposes   | Relevant assessments are to be undertaken in accordance with the Archaeological Management Plan.   | Site Inspection  | No works associated with this requirement were conducted during the audit period.   | Not Triggered |
| Symbolic fences   | Location and design options for the symbolic fences are to be addressed in the outdoor visitor infrastructure plan (condition 112). Documentary evidence of earlier fences and/or boundary markers must be considered.   | Site Inspection  | No works associated with this requirement were conducted during the audit period.   | Not Triggered |
| Artificial foraging habitat for Long-nosed Bandicoots – below P1, A28-29, P3, P5, P7 and near CP%   | Habitat reconstruction and/or rehabilitation shall only occur in accordance with the revised habitat assessment (condition 165).   | Site Inspection  | No works associated with this requirement were conducted during the audit period.   | Not Triggered |

| Wharf Precinct   | Specific outcomes/objectives  |                 |  |               |
|--|---|-----------------|--|---------------|
| Removal or modification of the existing fence along the beachfront | <p>Any modification or replacement of the existing fence shall occur in accordance with the following criteria:</p> <ul style="list-style-type: none"> <li>the design and materials will reflect the historic separation of uses and the need to provide adequate security (especially at night), but may allow for improved views and reduced visual impacts;</li> <li>limited openings in the fence may be provided, but must be capable of being closed for security reasons. Suitable areas include near the wharf and behind building A7;</li> <li>there shall be no openings at the northern end of the beach in the immediate vicinity of the outdoor eating area at A6, with the exception of openings to assist the movement of Little Penguins. Any existing openings in this area are to remain closed and are not to be available for general public access to the beach;</li> <li>any openings shall be of the minimum width necessary, but may be capable of being expanded in the event of an emergency;</li> <li>any openings are to include measures to protect the dunes and grassed areas and to prevent erosion; and</li> <li>temporary signage is to be provided on the beach during the Little Penguin breeding season, as detailed in condition 175).</li> </ul>   | Site Inspection | No works associated with this requirement were conducted during the audit period.  | Not Triggered |
| Waterfront forecourt   | Design of sculptures to be approved by DEC.   | Site Inspection | No works associated with this requirement were conducted during the audit period.  | Not Triggered |
| A14-17 – Visitor Centre  | The theatrettes are to follow the general layout and direction shown in Drawing No. L-A14-17 of the PAS, but options shall be investigated to provide for a greater retention of luggage racks.   | Site Inspection | No works associated with this requirement were conducted during the audit period. Luggage racks were observed in the Visitor Centre during the site inspection.  | Not Triggered |
| Open area between A7, A8 and A11-12                                | A5 symbolic presentation - removal of the bitumen to uncover footings is to occur in accordance with the provisions of the AMP.   | Site Inspection | No works associated with this requirement were conducted during the audit period. Gravel and bitumen was observed in this area during the site inspection.   | Not Triggered |
| A6 – Shade Structures  | <p><u>Indoors</u></p> <ul style="list-style-type: none"> <li>The timber platform may be relocated to another area within A6 if necessary.</li> <li>The construction works application shall specifically address the following matters: <ul style="list-style-type: none"> <li>provide details of access and serving arrangements for sit-down and take-away food provision;</li> <li>details of the proposed mezzanine, which shall be generally in accordance with the preliminary details provided by the Proponents and NPWS on 14 October 2002, and designed to minimise the mezzanine floor area (e.g. By efficient table layouts);</li> <li>demonstrate that the proposal will have as little adverse impact on significant fabric as practicable;</li> <li>demonstrate that the exhaust flue will have as little adverse visual impact on the external appearance of the building as practicable; and</li> <li>demonstrate that the finishes, equipment and services required for the restaurant operation are clearly capable of being removed, and fabric reinstated, at some future point consistent with the principle of reversibility.</li> </ul> </li> </ul> <p><u>Outdoors</u></p> <ul style="list-style-type: none"> <li>The boundary of the outdoor eating area must correspond with the beachside building line of A6.</li> <li>The existing coral trees in the vicinity of the outdoor eating area shall be regularly inspected and maintained in accordance with condition 160.</li> </ul> | Site Inspection | <p>Shade structures were observed to be temporary in nature. Finishes, equipment and services required for the restaurant operation appeared to be capable of being removed, and fabric reinstated, at some future point consistent with the principle of reversibility at the time of the site inspection.</p> <p>A Coral Tree in Peace Park fell down and was removed from site for safety in December 2019. Prior to removal it was inspected by a NPWS Ranger and Arborist and was found to contain no wildlife.</p> <p>The boundary of the outdoor eating area was observed to correspond with the beachside building line of A6 (the Boilerhouse) at the time of the site inspection.</p> <p>Individual table umbrellas and/or temporary shade structures were observed in the outdoor eating area, including the wharf area at the time of the site inspection.</p> <p>Umbrellas and shade structures were observed to be positioned to minimize, to the maximum extent possible, any adverse visual impact and did not contain any third-party advertising to the site and its operation at the time of the site inspection.</p> | Compliant     |

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|  | <ul style="list-style-type: none"> <li>A shade structure/s over the outdoor eating beside the Boilerhouse (Building A6) may be provided in accordance with approval granted by NSW Heritage Division (or any subsequent agency).</li> <li>Individual table umbrellas and/or temporary shade structures are permitted in the outdoor eating area, including the wharf area, where there is no permanent shade structure.</li> <li>Any umbrella or shade structure must be positioned as to minimize, to the maximum extent possible, any adverse visual impact. It shall not contain any third-party advertising to the site and its operation.</li> <li>The colour and nature of shade structures and/or umbrellas is to be neutral and in keeping with the natural environment.</li> </ul> <p>The colour, type, location, time limits and frequency of use of umbrellas or any shade structure must be approved by the Heritage Council prior to commencing use.</p>   |                 |  |               |
| A6 – sewer outlet  | The final route is to be determined following completion of assessments in accordance with the AMP and following approval of the Infrastructure Control Plan (condition 105).   | Site Inspection | No works associated with this requirement were conducted during the audit period.  | Not Triggered |
| Construction of stairway over the former funicular railway | <p>The final location of the route is to be determined following the outcomes of an archaeological assessment in accordance with the AMP.</p> <ul style="list-style-type: none"> <li>The stairway width shall be kept to the minimum necessary to comply with BCA requirements.</li> <li>No viewing or landing platforms shall be constructed, except where these may be necessary to achieve compliance with the BCA.</li> <li>Preference shall be given to a metal construction, rather than timber, with the physical footprint of the structure kept to the minimum necessary to comply with the BCA.</li> <li>The structure shall be of a colour that allows it to blend with the surrounding landscape.</li> <li>The entire route of the former Funicular shall be identified and interpreted.</li> <li>Lopping, trimming or removal of vegetation adjoining the stairway shall not occur, except where this is necessary as part of the stairway construction process or for on-going public safety. Vegetation shall not be removed for the sole purpose of improving views from the stairway.</li> </ul> | Site Inspection | Construction of a stairway over the former funicular railway occurred prior to the audit period. The stairway was observed during the site inspection. | Not Triggered |
| Bitumen pathway to hospital                                | Options for managing public access to the inscriptions, including re-alignment of the walkway, are to be considered in development of the Inscriptions Management Plan (condition 95).  | Site Inspection | No works associated with this requirement were conducted during the audit period.  | Not Triggered |
| <b>Third Class Precinct</b>                                | <b>Specific outcomes/objectives</b>   |                 |  |               |
| Second Cemetery  | <p>Options for re-instatement of headstones are to be addressed in the Heritage Landscape Management Plan (condition 91). Any proposal to re-instate headstones must be based on archival evidence regarding the original location of headstones. Where this is not available, the manner of reinstatement must clearly demonstrate this lost knowledge.</p> <p>Any evidence of graves, including clay banking from 1881, shall be retained as per DACMP Landscape Data Sheet L01 and L01a.</p>   | Site Inspection | No works associated with this requirement were conducted during the audit period.  | Not Triggered |
| Building S9  | Research into the construction history of the building is required prior to undertaking any works on this building. The results of this research should form the basis for developing an approach to the on going use and maintenance of this building.   | Site Inspection | No works associated with this requirement were conducted during the audit period.  | Not Triggered |
| Building P14-16  | <p>Detailed design work is to be submitted for proposed alterations to the shower and toilet blocks to address the requirements of the DACMP and relevant public health and educational facility requirements.</p> <p>If the public health and educational facility requirements cannot be met without significant departure from the provisions of the DACMP, then the alterations shall not proceed and alternative bathroom and shower arrangements must be</p>  | Site Inspection | No works associated with this requirement were conducted during the audit period.  | Not Triggered |

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|  | made. Alternate options to carpeting within this building (eg. rugs) consistent with DACMP requirements for floors must be submitted.  |                 |   |               |
| Building P28-29  | Retention of as much significant fabric as possible in accordance with DACMP Building Date Sheet P28-29.   | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| <b>Hospital &amp; Isolation Precinct</b>                 | <b>Specific outcomes/objectives</b>  |                 |   |               |
| H6   | Details of the approach to rectifying any problems associated with rising damp are to be submitted.  | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| H7-11 – accommodation                                    | Details of options for the retention of the 1914-1916 fabric and at least some of the 1958 fabric, in accordance with DACMP requirements, are to be submitted.   | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| H15  | The addition of a free-standing timber platform above the ground alongside H15 is approved, subject to the submission of design details that demonstrate this would not significantly alter the form of the building, its appearance, starkness in the landscape or its basic amenity (DACMP Building Date Sheet H15).<br>The timber platform shall be designed and constructed to be reversible and should be constructed close to the ground to minimise the need for a balustrade.  | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| S2   | Adaptation must retain as much significant fabric as possible as specified in DACMP Building Data Sheet S02. Particular attention shall be given to: <ul style="list-style-type: none"> <li>retention of as much of the partition layout as practicable;</li> <li>assess options for providing efficient guest access to the building, including swapping the location of the reception and guest lounge rooms as shown in Drawing No. L-S2 of the draft Site Master Plan (EIS Vol. 3);</li> <li>assess options for disabled access to the building; and</li> <li>removal of the lattice screen to the eastern verandah.</li> </ul> Refer also Schedule 2. | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| S4   | Reconstruction of the verandah shall occur following completion of research regarding an appropriate design.   | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| A28-29 – visitor shelter                                 | Details of the proposed mural are to be submitted to the DEC for approval. Provision for the retention of as much original fabric as possible shall be made in finalising detailed design plans for this building in accordance with DACMP requirements.<br>A sub-floor archaeological assessment is to be completed.  | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| A20  | Details of the proposed sampling approach to conservation of fabric, as per DACMP Building Data Sheet A20, are to be submitted.  | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| A26 – visitor shelter                                    | Details of the proposed mural are to be submitted to the DEC.  | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| A2   | Final design and material details for the entry area being submitted in accordance with the approved Heritage Landscape Master Plan (condition 91). Adaptation must retain as much fabric as possible as specified in DACMP Building Data Sheet A02.   | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| <b>First and Second-Class Precincts</b>                  | <b>Specific outcomes/objectives</b>  |                 |   |               |
| Eastern perimeter of road through First and Second Class | Service trench - <i>assessments must be completed in accordance with the AMP.</i>  | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| P1, P2   | Complete removal of all wall hot water tanks is not appropriate. Details of a sampling strategy must be submitted.   | Site Inspection | No works associated with this requirement were conducted during the audit period. | Not Triggered |
| P1, P2 and P9  | Corridors in these buildings shall be retained as a functioning part of the building. That is, they will be available for use by guests. Internal doors from rooms into these corridors must not be permanently sealed.  | Site Inspection | Internal doors were observed to be unsealed at the time of the site inspection.   | Compliant     |



|   |  |  |   |               |
|---|--|--|---|---------------|
|   |  | Form Architects, Heritage Impact Statement, Proposed Internal Alteration to Building P9, 20/10/20  |   |               |
| Re-instatement of badminton base, croquet lawn and tennis court | Options for re-instatement are to be addressed in the Heritage Landscape Management Plan (condition 91)  | Site Inspection<br>Thompson Berrill Landscape Design, Heritage Landscape Management Plan, May 2006<br><i>Heritage Landscape Masterplan</i> | Options for re-instatement of the badminton base, croquet lawn and tennis court were included in the Heritage Landscape Management Plan. The badminton base, croquet lawn and tennis court had not been re-instated at the time of the site inspection. | Compliant     |
| Building P11, P12   | Consistent with DACMP Building Data Sheets P11 and P12 the reconstruction of former stairs on the western elevation of buildings and the uncovering of fireplaces must be addressed in the construction works application for these buildings. | Site Inspection  | The stairs were removed for safety reasons.   | Not Triggered |

| Requirement   | Evidence  | Findings and Recommendation  | Compliance Status   |               |
|---|---|--|---|---------------|
| <b>SCHEDULE 4</b>                                     |   |  |   |               |
| <b>Works associated with the wharf (condition 42)</b> |   |  |   |               |
| 1   | <p>The following information shall be provided with the application:</p> <ul style="list-style-type: none"> <li>a) four copies of detailed dimensioned working drawings, all signed by the co-proponents (or their delegate), complying with the "Guidelines for Waterside Structures" fully and clearly describing all the proposed works and their components;</li> <li>b) a condition survey report that includes <ul style="list-style-type: none"> <li>• appropriate photographs</li> <li>• a detailed engineering commentary on the structure integrity of appropriate elements of the existing wharf</li> <li>• appropriate sketches or drawings;</li> </ul> </li> <li>c) a diver's inspection and pile inspection report;</li> <li>d) calculations to verify that the existing wharf is structurally sufficient to carry the proposed loads;</li> <li>e) correspondence from the operator that the wharf will be satisfactory for its intended use; and</li> <li>f) details of appropriate lighting to the wharf deck.</li> </ul> | <p>Auditee Interview 03/02/22<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p>Mawland management reported that discussions were ongoing with TfNSW concerning the use of the Wharf and declaration as public.</p>  | Not Triggered |
| 2   | <p>The following specifications shall be complied with:</p> <ul style="list-style-type: none"> <li>a) any parts of the existing wharf that require removal must be completely removed from Waterways Authority land. All piles and piers involved are to be completely withdrawn from the bed of the Spring Cove and not cut off. In accordance with condition 41), where such works require excavation or disturbance of the seabed a separate application and approval under Part 5 of the <i>Environmental Planning and Assessment Act 1979</i> will be required; and</li> <li>b) all work is to be done in such a way that no construction or demolition debris etc falls, flows or is carried to the bed or waters of the Spring Cove and any such material entering the Cove is to be removed immediately</li> </ul>  | <p>Auditee Interview 03/02/22<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p> | <p>No parts of the Wharf were removed during the audit period.</p>  | Not Triggered |
| 3   | <p>Prior to commencement of use of the wharf, the following works must be undertaken to the satisfaction of the Waterways Authority:</p> <ul style="list-style-type: none"> <li>a) installation of lifebuoys and ladders on the wharf;</li> <li>b) the top ½ metre of the mooring/fender piles shall be painted and kept painted white: all other elements of the facility shall be left unpainted or, if painting is required, be painted in a mid grey colour with matt finish; and</li> <li>c) installation of signage indicating that the wharf is for use by the public ferry service only and is not available for private access or mooring.</li> </ul>  | <p>SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) January 2020 to December 2020, 15/12/21<br/> SNC Lavalin, Annual Environmental Report Quarantine Station North Head (MP08_0041) July 2018 to December 2019, 15/12/21</p>                                 | <p>This requirement occurred prior to the audit period and has been assumed to have been addressed at the time specified and was therefore not assessed as part of this audit.<br/> Two lifebuoys were observed on the Wharf at the time of the site inspection.<br/> A sign was located at the end of the Wharf indicating the location was pick-up and drop-off only.</p> | Not Triggered |

| Requirement   |   |   | Evidence  | Findings and Recommendation   | Compliance Status |
|---|---|---|---|---|-------------------|
| SCHEDULE 5  |   |   |   |   |                   |
| <b>Long-nosed Bandicoots – monitoring requirements (conditions 167)</b>   |   |   |   |   |                   |
| The co-proponents shall undertake the following monitoring program.<br>1) The co-proponents will negotiate with the DEC an annual contribution to assist the on-going implementation of any monitoring programs established as part of the Long-nosed Bandicoot Recovery Plan (once adopted). The contribution will be adjusted annually to reflect changes in the CPI.<br>2) The following specific elements shall also be monitored by the co-proponents: |   |   | -   | -   | -                 |
| Element   | Timing  | Methods   |   |   |                   |
| Bandicoot activity and use of foraging habitat  | To commence within one month of the commencement date   | Monitoring will be undertaken using spotlight transects and surveys of Long-nosed Bandicoot diggings on a three monthly basis and will compare areas generally unaffected by the proposal (control areas) with areas potentially affected by the proposal (either by construction activities or visitors).  | Price & Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br>Price & Banks <i>et al</i> , An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report<br>Price & Banks <i>et al</i> , Population Viability Analysis on the Endangered North Head Long-nosed Bandicoot Population: Based on long-term data from 2004 to May 2020, July 2021, Draft<br>Figure - Biennial Bandicoot Monitoring Sites, 2018<br>Email – NPWS, Consent to enter and Notification of bandicoot survey May 10-15 North Head, 30/04/21 @10:46am | Monitoring reports for the audit period were available for review.<br>A figure dated 2018 showed Long-nosed Bandicoot monitoring trapping lines.<br>An email from NPWS to various stakeholders requesting permission for NPWS staff and volunteers to conduct the annual long nosed bandicoot survey between 10-15 May 2021 at North Head.  | Compliant         |
| Any enhanced, reconstructed or rehabilitated habitat established in accordance with condition 165)  | To commence within one month of the works being completed   | see above, but also to include identification of what use bandicoots are making of the enhanced habitat areas, i.e foraging, shelter, nesting   | Price & Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br>Price & Banks <i>et al</i> , An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report  | Monitoring reports for the audit period were available for review that included the use bandicoots were making of the enhanced habitat areas.   | Compliant         |
| Deaths of Long nosed bandicoots attributable to vehicles.<br>Road-deaths are taken to include any bandicoot remains identified on or next to roads.   | To begin within one month of the commencement date and to occur for the duration of the approval. | <ul style="list-style-type: none"> <li>road-death monitoring shall be conducted by an appropriately trained and licensed person on a daily basis, within two hours of sunrise and is to be undertaken by driving set routes at slow speeds.</li> <li><i>monitored roads are to include all public roads within Sydney Harbour National Park i.e. Blue Fish Road, Collins Beach Road, North Head Scenic Drive from the Parkhill Archway to the North Head look out, and the internal roads with the Quarantine Station.</i></li> <li><i>road deaths are to be recorded on a publicly accessible mortality register, noting basic morphological details (age, sex and condition), the date, the name of the recorder, microchip number of the animal (if present) and the location plotted using a GIS-based map (see also conditions 169A and 66). For the purposes of road mortality monitoring an adult Long-nosed Bandicoot is defined as: female – 450 grams or heavier; male –heavier than 650 grams<sup>73</sup>.</i></li> </ul> | Price & Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018<br>Price & Banks <i>et al</i> , An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report<br>NPWS, Bandicoot Mortality Register, September 2021  | <b>A publicly accessible Long-nosed Bandicoot mortality register was not available. The location of Long-nosed Bandicoot death plotted using a GIS-based map was not recorded.</b><br><b>Prepare and implement a publicly accessible Long-nosed Bandicoot mortality register in accordance with the requirements of Schedule 2.</b><br>Monitoring reports for the audit period were available for review.<br>Road-deaths are recorded by the NPWS Saving Our Species team in a Bandicoot Mortality Register. The register included the morphological details, the date, the name of the recorder and the microchip number (if present). | Non-compliant     |

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|  |  | <ul style="list-style-type: none"> <li>• <i>opportunities are to exist for the public to provide notification of road deaths that can be verified by a dead specimen or adequate photographic evidence.</i></li> <li>• <i>where the cause of death or the age of the individual cannot be determined at the time of notification, the remains are to be collected and stored and a necroscopy undertaken as soon as possible. Costs of the verification process shall be met by the co-proponents</i></li> </ul> |  |  |  |
|--|--|--|--|--|--|

| Requirement  | Evidence   | Findings and Recommendation   | Compliance Status |
|--|--|---|-------------------|
| <b>SCHEDULE 6</b>  |  |   |                   |
| <b>Long-nosed Bandicoots: Adaptive Management – Road Mortalities (conditions 169)</b>  |  |   |                   |
| <p><b>Boundary of Road Mortality Monitoring</b><br/> For the purposes of applying the following trigger mechanisms, Long-nosed Bandicoot road mortalities are those adult mortalities recorded in accordance with the methods specified in Schedule 5 but only for internal roads of the Quarantine Station.</p> <p><b>Trigger 1</b><br/> If the level of private vehicle traffic generated by the proposal increases 10% above the projected levels<sup>75</sup> measures shall be introduced to reduce traffic volumes to below these levels and as close as possible to the original projections. Trigger 1 will apply regardless of whether the following triggers have been reached and vica versa (eg. Trigger 2 could occur first, with Trigger 1 occurring at a later stage).</p> <p><b>Trigger 2</b><br/> If in any six-month period<sup>76</sup> there are 2 recorded adult road mortalities above the background level then the co-proponents must implement the following measures, unless otherwise agreed by the DEC:</p> <ol style="list-style-type: none"> <li>seek approval from the relevant authorities (including Council if necessary) to install additional traffic calming devices and signage at appropriate locations within or outside of the site as informed by the mortality register (Schedule 5) and GIS (Condition 66);</li> <li>investigate the feasibility of providing road-side fencing to create defined road-crossing points for Long-nosed Bandicoots, particularly using the existing traffic calming devices; and</li> <li>reduce the frequency and alter the timing of functions, conferences and activities (eg. scheduling finishing times of activities to minimise traffic leaving or arriving at the site after sunset).</li> </ol> <p>With the exception of any additional traffic calming devices, fencing and signage, the measures may be reversed with approval from the DEC if adult road deaths return to less than 2 above the background level for six consecutive months.</p> <p><b>Trigger 3</b><br/> If the measures in Trigger 2 above have been applied and adult road mortalities continue to exceed 2 deaths above the background level for a further six months then the co-proponents shall also implement the following measures, unless otherwise agreed by the DEC:</p> <ol style="list-style-type: none"> <li>implement a sunset-to-sunrise curfew for overnight guest and day visitor private vehicles arriving at or leaving the site (including CP1 if at least half the mortalities have occurred outside of the site). During the curfew: <ul style="list-style-type: none"> <li>buses and coaches may continue to access the site in accordance with conditions 150) and 151);</li> <li>the shuttle bus may continue to run from CPI to areas within the site; and</li> <li>staff may continue to access and park in CP5 at all times;</li> </ul> </li> <li>provide a night shuttle bus service between Manly and the site (or some other means of public transport); and</li> <li>implement measures identified in the assessment of habitat reconstruction and rehabilitation options (condition 165) that have not already been undertaken.</li> </ol> <p>The curfew must be implemented within 2 weeks of the six month mortality information becoming available. The curfew may be lifted and the shuttle bus service concluded with approval from the DEC once adult road mortalities return to less than 2 above the background level for six consecutive months.</p> <p><b>Trigger 4</b><br/> If the measures in Trigger 3 above have been applied and adult road mortalities continue to exceed 2 deaths above the background level for a further six months then the co-proponents shall also implement the following measures, unless otherwise agreed by the DEC:</p> <ol style="list-style-type: none"> <li>implement a total day and night ban on all guest and visitor private vehicles entering the site (including CP1 if at least half the mortalities have occurred outside the site). During the ban: <ul style="list-style-type: none"> <li>buses and coaches may continue to access the site in accordance with conditions 150) and 151);</li> <li>the shuttle bus may continue to run from CPI to areas within the site; and</li> <li>if at least half the mortalities have occurred inside the site, staff may only park in CP1 (with no restrictions on timing) otherwise staff may continue to access and park in CP5 at all times; and</li> </ul> </li> <li>provide a day and night shuttle bus service between Manly and the site (or some other means of public transport).</li> </ol> | <p>Price &amp; Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018</p> <p>Price &amp; Banks <i>et al</i>, An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report</p> | <p>Monitoring reports for the audit period were available for review.</p> <p>There were no Long-nosed Bandicoot deaths recorded at the Q Station in 2018 or 2019. One Long-nosed Bandicoot death was recorded in August 2020, the cause of death was stated as 'roadkill'. No Long-nosed Bandicoot deaths were recorded at the Q Station to September 2021.</p> | <p>Compliant</p>  |



| Requirement  | Evidence | Findings and Recommendation | Compliance Status |
|--|----------|-----------------------------|-------------------|
| <p>The ban must be implemented within 4 weeks of the six month mortality information becoming available. The ban and associated restrictions may be lifted with approval from the DEC once adult road mortalities return to less than 2 above the background level for 12 consecutive months.</p> <p><b>Trigger 5 – potentially catastrophic events</b></p> <p>If there are 10 adult road mortalities or more in any one month period or 15 or more in any consecutive three-month period, then all the measures identified in Triggers 2, 3 and 4 shall be implemented, unless otherwise agreed by the DEC. Where these are inconsistent, the more restrictive of the measures is to apply).</p> <p>The measures must be implemented within 2 weeks of the mortality information becoming available. The measures may only be reversed with approval from the DEC if adult road mortalities are less than the background level for 12 consecutive months.</p> |          |                             |                   |

| Requirement  | Evidence   | Findings and Recommendation   | Compliance Status |
|--|--|---|-------------------|
| SCHEDULE 7   |  |   |                   |
| <b>Long-nosed Bandicoots – Calculating the Background Adult Road Mortality Level (condition 170)</b>   |  |   |                   |
| <p>The following process shall be followed to enable the existing non-comprehensive monitoring information to be phased out and replaced by the new monitoring information. However, if the provisions of conditions 172) and 173) are enacted then they shall prevail over the following process.</p> <p><u>Process</u></p> <ul style="list-style-type: none"> <li>The revised background adult road mortality level is to be established by calculating a weighted average of the pre-commencement adult road mortalities (ie. the existing 10 per six months) with post-commencement recorded adult road mortalities, on the following basis:</li> <li>for the second year after the commencement date, the background level = 75% of 10 deaths plus 25% of the average six-monthly post-approval deaths (ie. adult road mortalities recorded during the first year after the commencement date);</li> <li>for the third year after the commencement date, the background level = 50% of 10 deaths plus 50% of the average six monthly post-approval deaths (ie. adult road mortalities recorded in the two years after the commencement date);</li> <li>for the fourth year after the commencement date, the background level = 25% of 10 deaths plus 75% of the average six monthly post-approval deaths (ie. adult road mortalities recorded in the three years after the commencement date); and</li> <li>for the fifth year after the commencement date the background level = the average six monthly post-approval deaths as recorded during the four years since the commencement date. This background level will be applied for the remainder of the life of the activity.</li> </ul> | <p>Price &amp; Banks, Long-nosed Bandicoot Monitoring North Head, Manly, November 2018</p> <p>Price &amp; Banks <i>et al</i>, An Analysis of the May 2020 Census of the North Head Long-nosed Bandicoot Population, April 2021, Draft Report</p> | <p>There were no Long-nosed Bandicoot deaths recorded at the Q Station in 2018 or 2019. One Long-nosed Bandicoot death was recorded in August 2020, the cause of death was stated as 'roadkill'. No Long-nosed Bandicoot deaths were recorded at the Q Station to September 2021.</p> | <p>Compliant</p>  |

| Requirement  | Evidence  | Findings and Recommendation  | Compliance Status    |
|--|---|--|----------------------|
| SCHEDULE 8   |   |  |                      |
| <b>Little Penguins: Adaptive Management (condition 179)</b>  |   |  |                      |
| <p><b>Trigger 1</b></p> <p>1) If monitoring indicates that the number of active Little Penguin breeding burrows between Cannae Point and the southern end of Store Beach has significantly decreased<sup>77</sup> over two successive breeding seasons<sup>78</sup> (July to February inclusive), and the DEC is satisfied that such decreases are either fully or partially related to the activity, the DEC may direct the co-proponents to implement appropriate measures. The measures may include, but not be limited to:</p> <ul style="list-style-type: none"> <li>a) a reduction in the number of lights and their intensity in the Wharf Precinct, particularly in the vicinity of the restaurant in A6;</li> <li>b) the provision of acoustic barriers in the vicinity of the restaurant at night, especially the outdoor eating area;</li> <li>c) cessation of outdoor dining in the vicinity of the restaurant in A6 at night during the breeding season (or all year round);</li> <li>d) restrictions on ferry movements, such as a set period either side of sunset or no movements between sunset and sunrise; and</li> <li>e) the provision of alternative public transport to the site during times when ferry movements are restricted.</li> </ul> <p>If further on-going monitoring indicates that the number of active Little Penguin breeding burrows in this area continues to decrease over subsequent breeding seasons, the DEC may direct the co-proponents to implement further measures.</p> <p>2) The co-proponents shall comply with any directions issued by the DEC in accordance with clause 1. Any measures required to be implemented may be reversed or altered with the approval of the DEC if monitoring indicates that the number of active Little Penguin breeding burrows for the population has increased over two successive breeding seasons.</p> <p>3) If Little Penguin deaths occur in the vicinity of the site as a result of matters reasonably beyond the control of the co-proponents (such as predator attacks, oil spills, etc), the number of active breeding burrows considered for the purposes of clause 1 may be adjusted in consultation with the DEC to account for such impacts (eg. to account for the likely impact of predator related deaths on lowering the number of active burrows).</p> <p><b>Trigger 2 – potentially catastrophic events</b></p> <p>1) If information becomes available that indicates a significant reduction<sup>79</sup> in the size of the Little Penguin population or a significant change to the behaviour of the population within a period of less than two successive breeding seasons, and the DEC is satisfied that the activity is likely to have contributed to that decline or change, the DEC may direct the co-proponents to implement appropriate measures. These may include, but are not limited to, the measures specified in Trigger 1.</p> <p>2) The co-proponents shall comply with any directions issued by the DEC under clause 1. Any measures required to be implemented may be reversed or altered with the approval of the DEC</p> <p><sup>77</sup> statistically significant is defined as the 5% probability level</p> <p><sup>78</sup> assessed on an annual basis for the preceding two breeding seasons as part of the annual environmental audit - see condition 221)</p> <p><sup>79</sup> statistically significant is defined as the 5% probability level</p> | <p>Auditee Interview 03/02/22<br/>NPWS, Manly Little Penguin Recovery Program 2018/19 Monitoring Report, 06/05/19</p> <p>NWPS, Manly Little Penguin Recovery Program 2020/21 FINAL Monitoring Report, 21/09/21</p> <p>North Head Stakeholder Group Meeting Minutes – 18/08/21, 17/03/21, 02/12/20, 01/07/20, 11/03/20, 18/12/19, 18/09/19, 01/05/19, 20/02/19, 10/07/18</p> | <p>The co-proponents reported that adaptive management measures were not triggered during the audit period but the dwindling numbers of Little Penguins have triggered action with the North Head Stakeholder Group.</p> <p>NPWS reported that fox baiting had increased during the audit period in an effort to protect the Little Penguins. North Head Stakeholder Group meeting minutes dated 11 March 2020 noted that new foreshore signs had been installed to raise awareness.</p> <p>The 2018/20219 and 2020/2021 Little Penguin monitoring reports note that Little Penguin breeding numbers remain low following a fox incursion and mass penguin killing at Manly in 2015. The 2020/2021 monitoring report notes that there was no breeding activity detected in the vicinity of the Q Station Boilerhouse and that this has caused a dramatic drop in numbers for the whole Q Station area.</p> <p>The Store Beach penguins were badly impacted by the 2015 fox attacks and associated human disturbance of the fox management program; however, numbers increased slightly in 2020/2021.</p> | <p>Not Triggered</p> |

| Requirement   | Evidence  | Findings and Recommendation  | Compliance Status |
|---|---|--|-------------------|
| SCHEDULE 9  |   |  |                   |
| <b>Environmental Management Plan (condition 191)</b>  |   |  |                   |
| <p>The EMP shall include the following matters:</p> <ol style="list-style-type: none"> <li>a) a clear statement of the objectives of the EMP;</li> <li>b) a brief description of the management and the planning framework;</li> <li>c) identification of the statutory and other obligations which the co-proponents must comply with during the undertaking of the activity;</li> <li>d) definition of the roles and responsibilities regarding implementation of the EMP and its various components;</li> <li>e) contact protocols outlining procedures and any notifications to be given before works commence, together with contact details for the relevant project manager;</li> <li>f) induction and training arrangements for contractors and staff;</li> <li>g) community liaison arrangements;</li> <li>h) mapping of key environmental features and proposed environmental safeguards, to include: <ul style="list-style-type: none"> <li>• topographic features</li> <li>• vegetation cover and threatened species locations /habitat</li> <li>• special items or areas of environmental or heritage sensitivity</li> <li>• suitable locations for construction infrastructure (eg. machinery and material storage), access ways for vehicles and proposed active work sites</li> <li>• location of sedimentation and erosion controls.</li> </ul> </li> </ol> <p>The mapped information should be capable of being incorporated into the GIS system for the site once this is approved and functioning (condition 66).</p> <ol style="list-style-type: none"> <li>i) specific objectives and strategies for the main environmental management elements. This should, at a minimum, identify what the issue is, compliance and best practice requirements, the action required, who will undertake the action and when. The main elements must include, but are not limited to: <ul style="list-style-type: none"> <li>• historic heritage</li> <li>• Aboriginal heritage</li> <li>• visitor management, access and traffic</li> <li>• flora and fauna</li> <li>• water quality and hydrological regimes</li> <li>• noise and air quality management</li> <li>• geotechnical issues</li> <li>• erosion and sedimentation</li> <li>• contamination</li> <li>• waste management</li> <li>• landscaping and rehabilitation</li> <li>• weed and predator controls</li> <li>• fire management</li> <li>• visual issues</li> <li>• hazards and risks, including measures to ensure public safety during the undertaking of construction and renovation activities (such as temporary fencing)</li> <li>• energy and resource use and recycling.</li> <li>• monitoring, inspection and reporting arrangements, including performance criteria, protocols (eg: frequency and location) and procedures to follow.</li> </ul> </li> </ol> | <p>DEC &amp; NPWS, North Head Quarantine Station, Environmental Management Plan, May 2005, Version 12</p> | <p>The requirements in the EMP were addressed in the following chapters:</p> <ol style="list-style-type: none"> <li>a) Chapter 2</li> <li>b) Chapter 3</li> <li>c) Chapter 4</li> <li>d) Chapter 5</li> <li>e) Chapter 6</li> <li>f) Chapter 7</li> <li>g) Chapter 8</li> <li>h) Appendix 19</li> <li>i) Chapter 10 and Appendix 6 – Appendix 6 the Integrated Monitoring and Adaptive Management System was not available for review.</li> </ol> <p>While the required inclusions of the EMP appear to have been addressed the EMP has not been updated since 2005. Refer to CoA 195 for further details.</p> | <p>Compliant</p>  |

## APPENDIX B – CONSULTATION RECORDS



**DPIE**

## Nick Ballard

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**From:** Alex McGuirk <[Alex.McGuirk@dpie.nsw.gov.au](mailto:Alex.McGuirk@dpie.nsw.gov.au)>  
**Sent:** Friday, 14 January 2022 3:17 PM  
**To:** Nick Ballard  
**Cc:** Derek Low  
**Subject:** RE: Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | DPIE

Hi Nick,

Thank you for consulting with the Department of Planning and Environment on the scope of the Quarantine Station North Head (08\_0041, last modified 25/05/2018) comprehensive audit.

As you are aware, included in the directions issued to the co-proponents on 8 November 2021 was submission via the Major Projects Portal “3) *By 1 June 2022, prepared consistent with Conditions 226-233 of the Approval and the Independent Audit Post Approval Requirements (2020), a comprehensive audit report for the period 1 July 2018 to 31 December 2021.*”

Therefore please ensure the comprehensive audit is conducted not only in accordance with conditions 226 to 233 of the approval but also Direction 3 (above) and the Requirements (2020). While condition 228 requires a comprehensive audit every five years, the previous audit report (SNC Lavalin, 2018) provided for an “additional year and a half to the EOFY 2018”. Accordingly, Direction 3 reduces the current audit period by a year and a half. Consistent with section 3.3 of the Requirements (2020), please ensure:

- All conditions applicable to the current phase are audited
- The environmental performance of the development is assessed, including but not limited to actual versus predicted impacts
- The implementation status of actions arising from the previous audit report and subsequent annual environmental reports (refer conditions 221 to 225) is included
- A high level assessment of the conservation works program (refer conditions 77 to 84) and site/site-wide plans (refer definitions, p285-6) is included
- A high level assessment of the integrated monitoring program, the monitoring results and the adaptive management system (refer conditions 216 to 220) is included.

The Department notes your consultation with the agencies identified in condition 228g and does not require consultation with additional parties.

The Department reminds you that conditions 230 to 232 require the draft comprehensive audit report be provided to nominated parties, with a minimum six week comment period, before the report is finalised and submitted.

If you have any questions, please do not hesitate to contact me,

**Alex McGuirk**  
**Senior Compliance Officer**

Planning & Assessment | Department of Planning & Environment  
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**From:** Nick Ballard <[nballard@wolfpeak.com.au](mailto:nballard@wolfpeak.com.au)>

**Sent:** Thursday, 13 January 2022 1:47 PM

**To:** DPE PSVC Compliance Mailbox <[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)>

**Subject:** FW: Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | DPIE

**Importance:** High

Hi,

I just wanted to make sure my below email (dated 23 December 2021) concerning the North Head Quarantine Station 2018 – 2021 Comprehensive Audit had not been missed during the Christmas/New Year period.

I look forward to hearing from you concerning the request.

Kinds Regards

Nick Ballard | Principal Environmental Auditor



E: [nballard@wolfpeak.com.au](mailto:nballard@wolfpeak.com.au)

P: 1800 979 716

M: [REDACTED]

A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)



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---

**From:** Nick Ballard

**Sent:** Thursday, 23 December 2021 11:14

**To:** [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

**Subject:** Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | DPIE

**Importance:** High

Hi There,

I am one of the approved independent auditors for the North Head Quarantine Station comprehensive audit and I am currently preparing to undertake the 2018 – 2021 audit.

The Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal prepared under Part 5 of the *Environment Planning and Assessment Act 1979* was approved in

December 2003 by the NSW Minister for the Environment, NSW Heritage Council and NSW Waterways Authority (the Determining Authorities).

The comprehensive audit is required to be conducted in accordance with Schedule 1, Conditions 226 to 233 of the Determination Report that set out the requirements for the audit. New South Wales National Parks and Wildlife Service has also been instructed by the Department of Planning Industry and Environment (DPIE) to conduct the audit consistent with DPIE's Independent Audits Post Approval Requirements (IAPAR), 2020.

For your information:

- The Determination Report and extracted Schedules 1 to 9 are attached.
- The IAPAR is available [HERE](#).

The on-site component of the audit is scheduled for a yet to be confirmed day during week commencing the 31 January 2022 and concerns post-approval requirements and compliance for the period 1 July 2018 to 31 December 2022.

In accordance with Schedule 1, Condition 229(g), I am consulting with the Department on the scope of the audit. I have also requested input into the scope from the other stakeholders referenced in Condition 229(g).

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Approval along with all post approval documents prepared to satisfy the Conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request you confirm:

- If there are any key issues you would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR; or
- If you recommend that other parties or agencies are to be consulted (in addition to those referenced in Condition 229(g)). If so, I request that you identify those parties.

Any questions please let me know, I look forward to hearing from you.

Kind Regards

Nick Ballard | Principal Environmental Auditor



E: [ballard@wolfpeak.com.au](mailto:ballard@wolfpeak.com.au)

P: 1800 979 716

M: [REDACTED]

A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)

**EPA**



## Nick Ballard

---

**From:** Bernie Turner <[redacted]@epa.nsw.gov.au>  
**Sent:** Wednesday, 19 January 2022 4:02 PM  
**To:** Nick Ballard  
**Subject:** RE: Comprehensive Audit of North Head Quarantine Station 2018 - 2021

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Nick

Thank you for consulting with the EPA for input into the scope for the 2018 – 2021 audit of the North Head Quarantine Station Conservation and Adaptive Re-use Proposal.

The EPA has no comment in regard to this matter.

I understand from your e-mail below and discussions with you of the 19 January 2022 that you have also requested input into the scope from the stakeholders referenced in Condition 229(g) including the Department of Planning and Environment (formerly DPIE and OEH).

Kind regards,

Bernie

**Bernie Turner**  
A/ Unit Head  
Metropolitan Operations Division  
NSW Environment Protection Authority  
02 9995 6844



[www.epa.nsw.gov.au](http://www.epa.nsw.gov.au) @NSW\_EPA

*The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.*

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

----- Forwarded Message -----

**From:** Nick Ballard [ [redacted]@wolfpeak.com.au]  
**Sent:** 13/01/2022 1:47 PM  
**To:** [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
**Subject:** FW: Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | Attn: EPA Hub

Hi,

I just wanted to make sure my below email (dated 23 December 2021) concerning the North Head Quarantine Station 2018 – 2021 Comprehensive Audit had not been missed during the Christmas/New Year period.

I look forward to hearing from you concerning the request.

Kinds Regards

Nick Ballard | Principal Environmental Auditor



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P: 1800 979 716

M: [REDACTED]

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---

**From:** Nick Ballard

**Sent:** Thursday, 23 December 2021 11:15

**To:** [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

**Subject:** Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | Attn: EPA Hub

**Importance:** High

Hi There,

I am one of the approved independent auditors for the North Head Quarantine Station comprehensive audit and I am currently preparing to undertake the 2018 – 2021 audit.

The Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal prepared under Part 5 of the *Environment Planning and Assessment Act 1979* was approved in December 2003 by the NSW Minister for the Environment, NSW Heritage Council and NSW Waterways Authority (the Determining Authorities).

The comprehensive audit is required to be conducted in accordance with Schedule 1, Conditions 226 to 233 of the Determination Report that set out the requirements for the audit. New South Wales National

Parks and Wildlife Service has also been instructed by the Department of Planning Industry and Environment (DPIE) to conduct the audit consistent with DPIE's Independent Audits Post Approval Requirements (IAPAR), 2020.

For your information:

1. The Determination Report and extracted Schedules 1 to 9 are attached.
2. The IAPAR is available [HERE](#).

The on-site component of the audit is scheduled for a yet to be confirmed day during week commencing the 31 January 2022 and concerns post-approval requirements and compliance for the period 1 July 2018 to 31 December 2022.

In accordance with Schedule 1, Condition 229(g), I am consulting with the Authority on the scope of the audit. I have also requested input into the scope from the other stakeholders referenced in Condition 229(g).

As you will see the required scope (outlined in Section 3.3 of the IAPAR) already covers an assessment of each relevant Condition of Approval along with all post approval documents prepared to satisfy the Conditions of Approval, including an assessment of the implementation of Environmental Management Plans and Sub-plans, complaints, incidents and so forth. These are included in the audit scope for this Project.

In providing input to the scope, I kindly request you confirm:

3. If there are any key issues you would like examined, relating to post-approval requirements and compliance that are not already called up by the scope in Section 3.3 of the IAPAR; or

Any questions please let me know, I look forward to hearing from you.

Kind Regards

Nick Ballard | Principal Environmental Auditor



E: [nballard@wolfpeak.com.au](mailto:nballard@wolfpeak.com.au)

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**TfNSW**



## Nick Ballard

---

**From:** Meredith Morris <[redacted]@transport.nsw.gov.au>  
**Sent:** Tuesday, 25 January 2022 2:48 PM  
**To:** Nick Ballard  
**Subject:** RE: Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | TfNSW

**Attachments:** North Head Quarantine Station Conservation and Adaptive Reuse Proposal - 2003.pdf; Schedules 1 to 9\_Development Approval.pdf; Q Station Annual Environmental Report - TfNSW comments - 14.01.2022.pdf

**Importance:** High

Hi Nick

Thank you for providing Transport for NSW with the opportunity to comment on the Audit of the North Head Quarantine Station 2018 – 2021.

We believe Section 3.3 of the IAPAR sufficiently covers the scope required, but attach a copy of our comments provided to Atkins Global on 14 January 2021 in relation to the Annual Environmental Reports for 2018-2019 and 2020 for your information.

Kind regards

Meredith Morris  
Portfolio Leasing Manager | Maritime Commercial & Community  
Property Asset Management  
Commercial, Performance & Strategy  
Infrastructure & Place | **Transport for NSW**

T 8849 2577 M [redacted]  
33 James Craig Road, Rozelle NSW 2039



---

**From:** Nick Ballard <[redacted]@wolfpeak.com.au>  
**Sent:** Thursday, 23 December 2021 11:14 AM  
**To:** Meredith Morris <[redacted]@transport.nsw.gov.au>  
**Subject:** Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | TfNSW  
**Importance:** High

Hi Meredith,

I am one of the approved independent auditors for the North Head Quarantine Station comprehensive audit and I am currently preparing to undertake the 2018 – 2021 audit.

The Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal prepared under Part 5 of the *Environment Planning and Assessment Act 1979* was approved in December 2003 by the NSW Minister for the Environment, NSW Heritage Council and NSW Waterways Authority (the Determining Authorities).

The comprehensive audit is required to be conducted in accordance with Schedule 1, Conditions 226 to 233 of the Determination Report that set out the requirements for the audit. New South Wales National Parks and Wildlife Service has also been instructed by the Department of Planning Industry and

Environment (DPIE) to conduct the audit consistent with DPIE's Independent Audits Post Approval Requirements (IAPAR), 2020.

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Any questions please let me know, I look forward to hearing from you.

Kind Regards

Nick Ballard | Principal Environmental Auditor



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P: 1800 979 716

M: [REDACTED]

A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

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OFFICIAL

# Heritage NSW

## Nick Ballard

---

**From:** Nick Ballard  
**Sent:** Thursday, 23 December 2021 11:15 AM  
**To:** HERITAGEMailbox@environment.nsw.gov.au  
**Subject:** Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | Heritage  
**Attachments:** North Head Quarantine Station Conservation and Adaptive Reuse Proposal - 2003.pdf; Schedules 1 to 9\_Development Approval.pdf  
**Importance:** High

Hi There,

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Any questions please let me know, I look forward to hearing from you.

Kind Regards

Nick Ballard | Principal Environmental Auditor



**EXCELLENCE IN THE  
ENVIRONMENT  
AWARDS 2021**



E: [nballard@wolfpeak.com.au](mailto:nballard@wolfpeak.com.au)

P: 1800 979 716

M: 0406 012 446

A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)



Member



Infrastructure  
Sustainability  
Council of Australia

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Subject: Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | Heritage

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## Nick Ballard

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**Subject:** Relayed: FW: Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | Heritage

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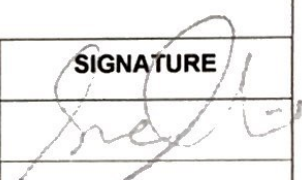
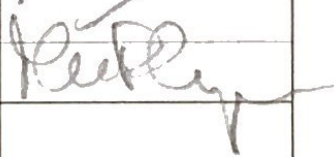
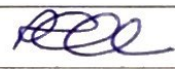
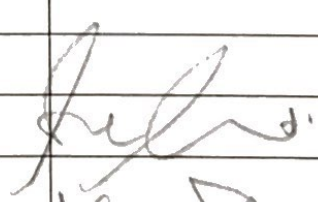
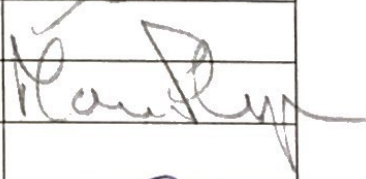

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Subject: FW: Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Clause 243 Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal | Heritage

## **APPENDIX C – AUDIT MEETINGS ATTENDANCE RECORDS**



## INDEPENDENT AUDIT MEETING ATTENDANCE RECORD

|   |  |                     |   |
|---|--|---------------------|---|
| <b>PROJECT (NAME AND APPROVAL NUMBER)</b> | Quarantine Station   MP08_0041                             |                     |   |
| <b>DATE</b>                               | 3 February 2022  |                     |   |
| <b>LOCATION</b>                           | 1 North Head Scenic Drive, Manly NSW 2095, New South Wales |                     |   |
| <b>OPENING MEETING</b>                    |  |                     |   |
| <b>NAME</b>                               | <b>POSITION / TITLE</b>                                    | <b>ORGANISATION</b> | <b>SIGNATURE</b>  |
| Suzanne Starks                            | Director   | Manlyland           |    |
| Max Player                                | Director   | Manlyland           |    |
| REBECCA YIT                               | NPWS ELO   | NPWS                |   |
| <b>CLOSING MEETING</b>                    |  |                     |   |
| <b>NAME</b>                               | <b>POSITION / TITLE</b>                                    | <b>ORGANISATION</b> | <b>SIGNATURE</b>  |
| Suzanne Starks                            | Director   | Manlyland           |  |
| Max Player                                | Director   | Manlyland           |  |
| REBECCA YIT                               | ELO  | NPWS                |  |

## **APPENDIX D – AUDITOR APPROVAL**



Michelle Whitmore

Manager Commercial Projects and Utilities  
National Parks and Wildlife Service

30 November 2021

Dear Michelle

**Quarantine Station North Head (MP08\_0041)  
Approval of independent auditor**

I refer to your request (MP08\_0041-PA-2) for the Secretary's approval of a suitably qualified, experienced and independent person to prepare the comprehensive audit required under the Quarantine Station North Head approval (MP08\_0041 as modified).

The Department has reviewed the information you have provided and is satisfied that the nominees are suitably qualified, experienced and independent.

In accordance with condition 227 of the approval, as well as the Directions issued 8 November 2021 requiring the audit be prepared consistent with the *Independent Audit Post Approval Requirements* (2020), the Secretary has agreed to the following auditors:

- Mr Nick Ballard, Principal Environmental Auditor, Wolfpeak
- Mr Derek Low, Principal Environmental Consultant, Wolfpeak.

Please ensure this correspondence is appended to the comprehensive audit report.

The audit must be prepared, undertaken and finalised in accordance with conditions 226 to 233 of the approval, as well as the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

The Department reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the agreement for the above listed auditors for this Project, each respective project approval or consent requires a request for the agreement to the auditor(s) be submitted to the Department, for consideration of the Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor(s) will be considered.

If you wish to discuss the matter further, please contact Alex McGuirk, Senior Compliance Officer, via [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely,

Rob Sherry

**Team Leader Compliance - Government Projects**

*As nominee of the Planning Secretary*

## **APPENDIX E – AUDITOR INDEPENDENCE DECLARATIONS**


|                                |   |
|--------------------------------|---|
| <b>Project Name:</b>           | Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal            |
| <b>Consent Number:</b>         | MP 08_0041  |
| <b>Description of Project:</b> | Conservation and adaptive re-use of the North Head Quarantine Station within Sydney Harbour National Park |
| <b>Project Address:</b>        | 1 North Head Scenic Drive, Manly NSW 2095   |
| <b>Proponent:</b>              | New South Wales National Parks and Wildlife Service Pty Ltd and the Mawland Group Pty Ltd                 |
| <b>Title of Audit</b>          | North Head Quarantine Station Comprehensive Audit 2018 - 2021   |
| <b>Date:</b>                   | 10/02/22  |

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

|                         |   |
|-------------------------|---|
| <b>Name of Auditor:</b> | Derek Low   |
| <b>Signature:</b>       |      |
| <b>Qualification:</b>   | Master of Environmental Engineering Management<br>Exemplar Global Auditor Number 114283 |
| <b>Company:</b>         | WolfPeak Pty Ltd  |


|                                |   |
|--------------------------------|---|
| <b>Project Name:</b>           | Determination Report - North Head Quarantine Station Conservation and Adaptive Re-use Proposal            |
| <b>Consent Number:</b>         | MP 08_0041  |
| <b>Description of Project:</b> | Conservation and adaptive re-use of the North Head Quarantine Station within Sydney Harbour National Park |
| <b>Project Address:</b>        | 1 North Head Scenic Drive, Manly NSW 2095   |
| <b>Proponent:</b>              | New South Wales National Parks and Wildlife Service Pty Ltd and the Mawland Group Pty Ltd                 |
| <b>Title of Audit</b>          | North Head Quarantine Station Comprehensive Audit 2018 - 2021   |
| <b>Date:</b>                   | 10/02/22  |

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2020)*;
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

**Notes:**

- a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

|                         |  |
|-------------------------|--|
| <b>Name of Auditor:</b> | Nick Ballard   |
| <b>Signature:</b>       |                       |
| <b>Qualification:</b>   | BSC (Hons) Global Forest Resources & Forest Products Technology<br>Exemplar Global Auditor Number 129713 |
| <b>Company:</b>         | WolfPeak Pty Ltd   |



## APPENDIX F – SITE INSPECTION PHOTOGRAPHS

Observations from the site inspection are provided in Section 4 and 5. The Auditor was escorted around the site by Project personnel who made themselves available for this purpose.

**Q Station Site Inspection Photographs – 3 February 2022**



01 The entrance to the Q Station.



02 The public bus stop outside the entrance to the Q Station.

Q Station Site Inspection Photographs – 3 February 2022



03 Traffic calming measures on Darley Road leading to the Q Station entrance.



04 Signage directing visitors to the CP1 car park.



Q Station Site Inspection Photographs – 3 February 2022



05

Sign outside Reception providing instructions to visitors to the Q Station.



06

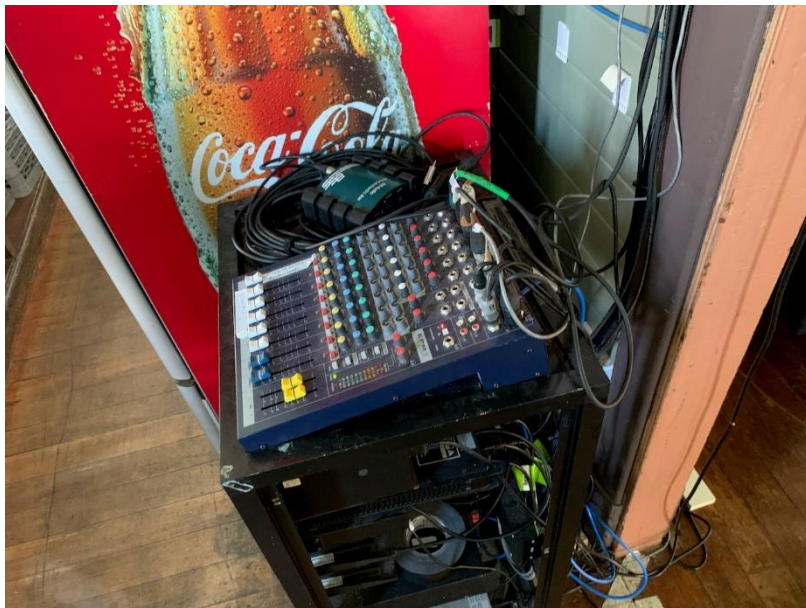
CP1.

Q Station Site Inspection Photographs – 3 February 2022



07

CP5.

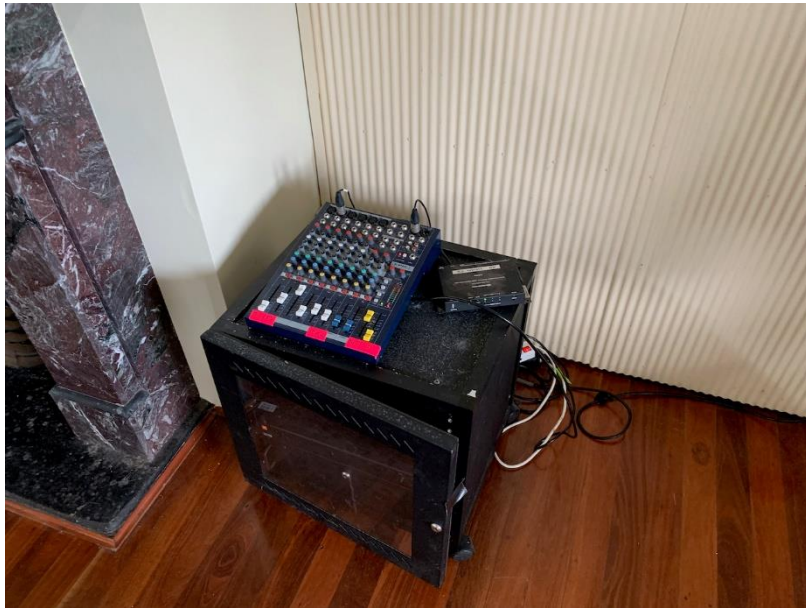


08

Building P27 sound system with noise limiter that cuts the music when the decibel threshold is reached. Only Q Station staff can reset the system once it is tripped.



Q Station Site Inspection Photographs – 3 February 2022



09 Building H10 sound system with noise limiter.



10 P27 – waste management.



Q Station Site Inspection Photographs – 3 February 2022



11 CP5 – Bin storage area.



12 Waste bins at the Hospital Precinct.

Q Station Site Inspection Photographs – 3 February 2022



13 Waste bins behind the Boilerhouse.



14 Public waste bins in the Wharf Precinct.



Q Station Site Inspection Photographs – 3 February 2022



15

Waste bins in the Café at the Wharf.



16

P23 reconstructed during the audit period.

Q Station Site Inspection Photographs – 3 February 2022



17 Information board for building P22.



18 Information notice for the Hospital Precinct.



## Q Station Site Inspection Photographs – 3 February 2022



19

Information board at the foot of the funicular stairway.



20

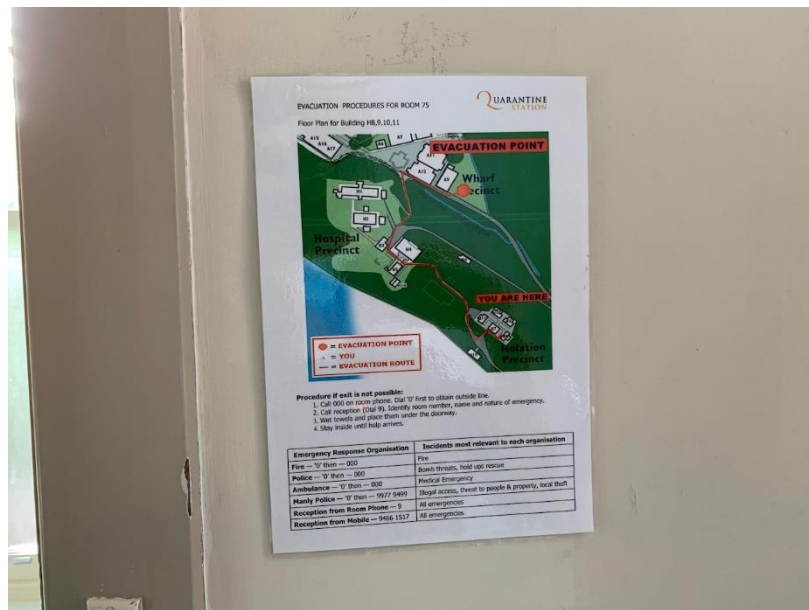
Information board at the Inscriptions in the Wharf Precinct.

## Q Station Site Inspection Photographs – 3 February 2022



21

Information board at the Wharf Precinct.



22

Evacuation notice for buildings H9, H10 and H11.



Q Station Site Inspection Photographs – 3 February 2022



23 Evacuation notice for building H7.



24 Evacuation plan for P6 former kitchen.

Q Station Site Inspection Photographs – 3 February 2022



25

In-situ sealed asbestos cement sheeting.



26

Asbestos cement sheeting with warning sign.

Q Station Site Inspection Photographs – 3 February 2022



27 Moveable collection in H10.



28 Collectibles on display in the Visitor Centre at the Wharf.



Q Station Site Inspection Photographs – 3 February 2022



29 Collectibles in Building P6.



30 The sewage pumping station located on Wharf Road. Sewage is pumped to CP5 and then onto the neighbouring Australian Institute of Police Management and from there it to the municipal sewer system.

Q Station Site Inspection Photographs – 3 February 2022



31

The Little Penguin fence located adjacent to the Boilerhouse. The Corridor is behind the fence.



32

Weeds were observed in the Little Penguin corridor adjacent to the Boilerhouse outdoor entertainment area.



Q Station Site Inspection Photographs – 3 February 2022



33

Sun shade umbrellas at the Boilerhouse



34

Fencing to Quarantine Beach.

Q Station Site Inspection Photographs – 3 February 2022



35 Moveable gate that is closed at sunset to stop access to Quarantine Beach.



36 Fencing to stop access to Quarantine Beach.



Q Station Site Inspection Photographs – 3 February 2022



37 The fence installed near the southwest end of Building A14-17 to limit public access to Cannae Point (CoA 76).



38 The Wharf - wooden sheeting had been placed on one side to manage trips and falls.

Q Station Site Inspection Photographs – 3 February 2022



39

The Wharf - evidence of decay was observed to a Wharf sleeper.



40

The Wharf – an unmounted lifebuoy was observed at the end of the Wharf.



Q Station Site Inspection Photographs – 3 February 2022



41 The Wharf – a leaving notice and prohibited activities sign located at the end of the Wharf.



42 One of only two yellow markers were observed to delineate the no mooring area for seagrass. Mawland had requested to NPWS additional markers be installed to provide a clear line of delineation.

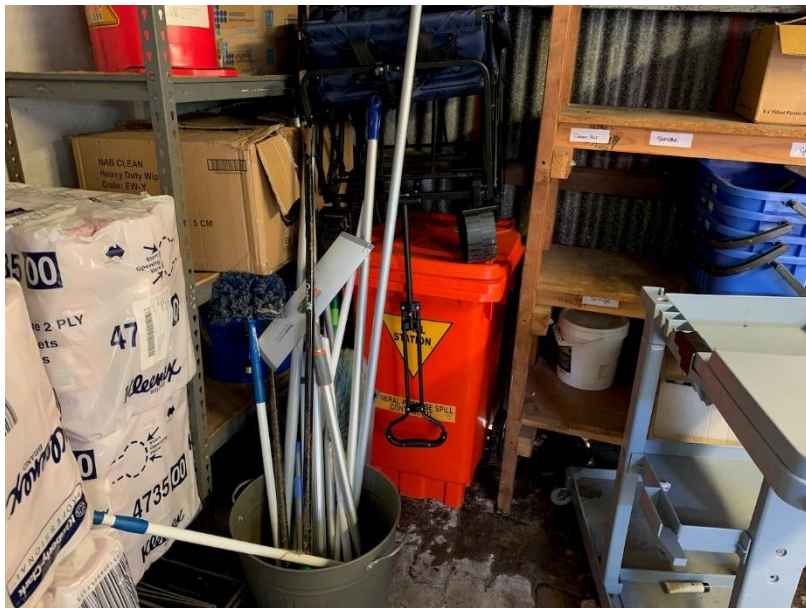


Q Station Site Inspection Photographs – 3 February 2022



43

The in-situ and untouched concrete stormwater pipe at Quarantine Beach.



44

A spill kit located in the in the linen shed at the Former First Class Precinct. The spill kit was obstructed by a cleaning equipment and had a chair placed on top of it. A flammables material chest was located in the shed; however, fuel containers (petrol) were empty.

Q Station Site Inspection Photographs – 3 February 2022



45 The former tennis court and croquet lawn.



46 One vending machine located in the Former First Class Precinct. The machine will be removed in 2022 when the contract expires.



Q Station Site Inspection Photographs – 3 February 2022



47 The Aboveground Storage Tank located opposite Building A18 Former Locomotion Shed.



48 The bund to the former aboveground storage tank located opposite Building A18 Former Locomotion Shed was observed to contain a shallow layer of water and a diesel odour was noted coming from inside the bund.

Q Station Site Inspection Photographs – 3 February 2022



49 Maintenance/Glasshouse Building (A24) – Incompatible Class 3 (flammable) and Class 8 (corrosive) products were observed to be stored together and without secondary containment in the end room.



50 Maintenance/Glasshouse Building (A24) – Incompatible Class 3 (flammable) and Class 8 (corrosive) products were observed to be stored together and without secondary containment in the end room.



Q Station Site Inspection Photographs – 3 February 2022



51 Maintenance/Glasshouse Building (A24) – Incompatible Class 3 (flammable) and Class 8 (corrosive) products were observed to be stored together and without secondary containment in the end room.



52 Maintenance/Glasshouse Building (A24) – Incompatible Class 3 (flammable) and Class 8 (corrosive) products were observed to be stored together and without secondary containment in the end room.



Q Station Site Inspection Photographs – 3 February 2022



53 Maintenance/Glasshouse Building (A24) – An hand written container of round-up was observed in the end room.



54 Maintenance/Glasshouse Building (A24) – Evidence of reorganization of the flammable and corrosive packages was provided to the Auditor on 10 February 2022; however, they remained in the timber building.

Q Station Site Inspection Photographs – 3 February 2022



55 Maintenance/Glasshouse Building (A24) – Evidence a fire extinguisher had been placed in the end room was provided to the Auditor on 10 February 2022.



56 Maintenance/Glasshouse Building (A24) – an unlabelled flammable goods chest was observed in the office.

Q Station Site Inspection Photographs – 3 February 2022



57

Locked unlabelled flammable goods cabinet in the CP5 maintenance shed.



58

Evidence the CP5 maintenance shed flammables goods cabinet had been labelled was provided to the Auditor on 10 February 2022.



Q Station Site Inspection Photographs – 3 February 2022



59 Evidence the Building A23 (Linen Store) flammables cabinet had been labelled was provided to the Auditor on 10 February 2022.



60 The fence to the open reservoir on Entrance Road was observed to be broken. Given the Q Station is open to the public there exists the potential for a person to enter the reservoir area. No signs warning of the water hazard were observed. No lifebuoys or other water rescue equipment or means of egress were observed in the vicinity of the reservoir.



Q Station Site Inspection Photographs – 3 February 2022



61 Evidence the fence to the open reservoir had been repaired was provided to the Auditor on 10 February 2022.



62 Evidence of warning signs of the open reservoir was provided to the Auditor on 10 February 2022.



## **APPENDIX G – STAKEHOLDER FEEDBACK ON THE DRAFT AUDIT REPORT**

## Derek Low

---

**From:** Derek Low  
**Sent:** Monday, 14 March 2022 3:43 PM  
**Subject:** Comprehensive Audit of North Head Quarantine Station 2018 - 2021 | Request for comment on draft audit report  
**Attachments:** North Head Quarantine Station\_MP08\_0041\_Comprehensive Audit 2018-2021\_0.2\_combined.pdf  
**Follow Up Flag:** Follow up  
**Due By:** Friday, 29 April 2022 4:00 PM  
**Flag Status:** Flagged

Hi there.

I am one of the Department of Planning and Environment (the Department) approved independent auditors on the North Head Quarantine Station (the Q Station). I am currently completing the 2018 – 2021 audit.

Approval of the Q Station was granted by the (then) Minister for Infrastructure and Planning in accordance with Section 115B of the Environmental Planning and Assessment Act (the EP&A Act) in 2003 (Reference MP08\_0041). Approval was granted subject to conditions.

The audit is being conducted in accordance with Schedule 1, conditions 226 to 233 of the approval MP08\_0041 and the Department's *Independent Audits Post Approval Requirements* (IAPAR), 2020.

The approval can be accessed here: <https://www.planningportal.nsw.gov.au/major-projects/projects/quarantine-station-north-head>

The IAPAR can be accessed here: <https://www.planning.nsw.gov.au/-/media/Files/DPE/Other/Assess-and-regulate/About-Compliance/independent-audit-post-approval-requirements-2020-05-19.pdf>

Condition 230 of MP08\_0041 requires that *'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'*.

Condition 231 of MP08\_0041 requires that *'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.'*

A preliminary draft report, presenting the findings from the 2018-2021 audit period, was distributed to the co-proponents (NPWS and NPWS and Mawland Quarantine Station Pty Ltd) to check factual matters and for input into actions in response to findings (where relevant). The preliminary draft was reviewed and updated in response to their initial feedback, noting that the auditor retained the right to make findings or recommendations based on the facts presented.

The revised draft audit report is attached and is ready for agency and community committee review.

In accordance with conditions 230 and 231 I kindly request that you review the revised draft audit report and provide comment to me **prior to 29 April 2022**.

Any questions please let me know. I look forward to hearing from you.

**Derek Low | Principal Environmental Consultant**  
General Manager



E: [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)

P: 1800 979 716

M: 0402 403 716

A: Suite 2, Level 10, 82 Elizabeth St, Sydney NSW 2000

[www.wolfpeak.com.au](http://www.wolfpeak.com.au)

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Our ref: DOC22/195857

Mr Derek Low  
Principal Environmental Consultant  
WolfPeak  
Suite 2, Level 10, 82 Elizabeth Street  
SYDNEY NSW 2000

By email: dlow@wolfpeak.com.au

Dear Mr Low

**Re: Quarantine Station, North Head, Manly LGA – SHR Item No. 1003  
Fourth Comprehensive Audit of the Conservation and Adaptive Re-Use Proposal**

Reference is made to your email dated 14 March 2022 enclosing a copy of the draft Comprehensive Audit Report for 2018-2021.

It is acknowledged that the first audit was prepared in 2007 in accordance with Condition 226 of the Conditions of Approval (CoA) which required the conduct of an independent and comprehensive audit at the conclusion of Stage 2 of the project implementation schedule. Condition 228 of the CoA requires the submission of subsequent comprehensive audit reports every five years after the commencement date.

Condition 230 requires that the draft Audit report be submitted to the Department of Planning and Environment (formerly Department of Environment and Climate Change); NSW Heritage Council; Department of Primary Industry (formerly NSW Fisheries) and the Quarantine Station Community Committee, for comment. The auditor must consider all of the comments received before finalising the audit report.

The draft Audit Report has now been reviewed by staff of Heritage NSW on behalf of the Heritage Council of NSW.

It is noted that this is the first audit to assess compliance with all of the CoA as requested by Direction 3, issued by the Department of Planning and Environment on 8 November 2021. Direction 3 also reduced the current audit period by a year and a half. Of the total of 289 CoA from Schedule 1 through 9 that were assessed in the draft audit, 168 were compliant, 26 were non-compliant and 95 were not triggered.

The draft audit considered in Table 6 the actual impact to Cultural Heritage arising from the carrying out of the activity and consider that they are consistent with the impact predicted in the EIS. The change in use was observed to be sympathetic to the original layout and structure and visitor access numbers had little impact on the Q Station, due to the effects of COVID-19.

Heritage NSW consider that (in general), the cultural heritage risks have been appropriately identified and managed through the hierarchy of documents such as the Environmental Impact Assessment (EIS), the Preferred Activity Statement (PAS) the Detailed Area Conservation Management Plans (DACMP), the endorsed Site Wide Plans and the individual Section 60 applications required under the Heritage Act, 1977, as part of the overarching approval for the activity.

The draft audit however identifies that several of the management plans related to cultural heritage, such as the Moveable Heritage and Resources Plan, 2007, the Heritage Landscape Management Plan, 2006, the Inscriptions Management Plan, the Aboriginal Heritage Management Plan, the Internal Fitout Plan and the Interpretation Plan, have not been reviewed every five years and revised as per the relevant CoA. It is noted however that a revised Quarantine Station Moveable Heritage and Resource Collection Plan (dated 2021) was submitted to Heritage NSW on 9 February 2022 for review.

Heritage NSW strongly concurs with the audit recommendations in relation to the need for a comprehensive review of all management plans and that their structure be improved so as to highlight management actions that can be easily identified, implemented and reported and audited against.

Heritage NSW also agrees with recommendation by the auditors that in order to achieve the preservation of heritage values on the site through conservation and maintenance, a review of the Conservation Works Program (CWP) is required to be undertaken against the first comprehensive audit of the activity (CoA no. 228) and thereafter on an annual basis as part of the annual environmental report (CoA no. 221).

If you have any questions regarding the above advice, please contact Tempe Beaven, Senior Assessment Officer at Heritage NSW on 9873 8629 or [tempe.beaven@environment.nsw.gov.au](mailto:tempe.beaven@environment.nsw.gov.au).

Yours sincerely

*Michael Ellis.*

**Michael Ellis**

Manager, Assessments

Heritage NSW

Department of Planning and Environment

**As Delegate of the Heritage Council of NSW**

5 April 2022



Sandy Hoy on behalf of  
Quarantine Station Community Consultative Committee  
sandy@parklandplanners.com.au

Derek Low  
Principal Environmental Consultant  
Wolfpeak  
dlow@wolfpeak.com.au

29 April 2022

Dear Derek

### **Comments on Draft North Head Quarantine Station Comprehensive Audit 2018-2021**

Thank you for the opportunity for the members of the Quarantine Station Community Consultative Committee (QSCCC) to comment on the Draft North Head Quarantine Station Comprehensive Audit 2018-2021.

As requested I have combined the comments received from QSCCC members and my comments below.

#### **General comments**

Thanks Suzanne and those who were involved in the detailed preparation of these reports. I support the comments on all points made by Mawlands and reiterate that there should be recognition in these and future reports that the Q Station is a living and breathing 'organism' and compliance with visitor and other human activities occurring at Q Station should 'move with the times'.

I endorse the sentiments expressed in the Executive Summary for:

- The need to update the Site Wide Plans, which the Auditor mentions lack formal document control and elements of the plans have been adopted in an ad-hoc basis. I concur that this is more likely to be a result of the complexity of the shared co-proponent process, rather than intent.
- The need to clarify and formalise the differentiation of roles between the co-proponents.

Several non-compliances identified in the report can be addressed by updating the Site Wide Plans in 2022 as intended, and by implementing the plans.

#### **Throughout**

'QSCC' should be changed to 'QSCCC' consistent with the Department of Planning and Environment's designated formal name of Quarantine Station Community Consultative Committee since 2019.

#### **Specific comments**

Page 2 – Clause 1.2:

- I am not aware what "consultation with the community" was undertaken by the Audit team. It would be good to clarify this point.

Page 5 – Paragraphs 1 and 2:

- To be correct, reference to the nomenclature "Q Station" prior to 2006 should be changed to "Quarantine Station" as the given name "Q Station" was not adopted until after Mawland became the leaseholder in 2006.

Page 5 and page 28:

- 'Manly' Council/LGA should be 'Northern Beaches' Council/LGA.

Page 54 Community Consultation – for 56, 57, 58, 59 and 60

- the QSCCC meeting minutes are also available on the Q Station website. That link should also be included under the given environment nsw link.

Page 54 point 57:

- the DPIE Expression of Interest for the QSCCC dated 27 April 2021 for two vacant positions as well as members of the committee was not publicly issued to my knowledge.

Page 54 point 58:

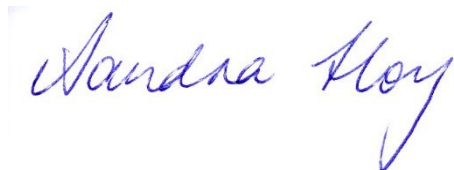
- the QSCCC follows the NPWS Terms of Reference as well as the later DPE 'Community Consultative Committee Guideline: State Significant Projects' (January 2019).

Page 55 point 59:

- the final minutes of the meeting held on 10 November 2021 are available and were endorsed and finalised at the next scheduled meeting held in February 2022.
- Columns 2 and 3: No QSCCC meeting was held in February 2019 as the current QSCCC had not yet been appointed. The first meeting of the current QSCCC was held in May 2019. Please either delete the last dot point, or refer to the minutes of meetings of the previous QSCCC no. 62 on 16 May 2018, 63 on 15 August 2018 and 64 on 14 November 2018.
- Complete the last sentence in column 4.

If you have any questions about our comments please let me know.

Yours sincerely



**Sandy Hoy**  
Chair  
Quarantine Station Community Consultative Committee

Our ref: 08\_0041 (Q Station)

Your ref: Project No. 372

via email: [dlow@wolfpeak.com.au](mailto:dlow@wolfpeak.com.au)

22 April 2022

---

**Subject:** Q Station comprehensive audit 2018 - 2021 – draft report for comment

Dear Derek,

I refer to your email to the Department of Planning and Environment (**Department**; successor to Planning NSW / Department of Infrastructure, Planning and Natural Resources) dated 14 March 2022 providing the draft report for the North Head Quarantine Station Comprehensive Audit 2018 – 2021 (Wolfpeak, revision 0.2, 14/03/22; **draft report**).

Under condition 230 of the Q Station approval (08\_0041 as modified; **Approval**), the draft report is to be submitted for comment to six nominated organisations, including the Department.


The Department has reviewed the draft report with reference to the:

- Approval conditions, including but not limited to the monitoring and auditing program conditions (216 to 233)
- Directions issued by the Department to each co-proponent, being National Parks and Wildlife Service and The Mawland Group, on 8 November 2021, including the direction to submit via the Major Projects Portal “3) By 1 June 2022, prepared consistent with Conditions 226-233 of the Approval and the Independent Audit Post Approval Requirements (2020), a comprehensive audit report for the period 1 July 2018 to 31 December 2021”
- matters identified by the Department on 14 January 2022 (which are included in Appendix B to the draft report).

The Department provides the following comments attached for your consideration.

If you wish to discuss the matter further, please contact Alex McGuirk, Senior Compliance Officer, via [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely,



Rob Sherry

**Team Leader Compliance – Government Projects**

## Attachment

### 1. Audit scope and methodology

In relation to the audit scope (section 1.2) and methodology (sections 3.2 & 3.3):

- the Department issued the relevant Direction to each co-proponent
- Approval conditions 229g & 230 include reference to the “Heritage Council”. Please confirm that Heritage NSW was:
  - consulted on the audit scope, and update section 1.2 and Appendix B accordingly (these reference the EPA and not Heritage NSW)
  - provided at least six weeks to comment on the draft report
- please identify if any of the interviewees are the Environmental Manager or the Heritage Advisor and, if so, the period they fulfilled the role.

### 2. Activities during the audit period

In relation to the activities during the audit period (section 2.3), the Department understands that the following also occurred:

- construction of two fender piles near the wharf in preparation for the Invictus Games, which were held in October 2018
- sand replenishment of Quarantine Beach on unknown date(s)
- conservation works, such as maintenance and environmental management programs.

### 3. Environmental Performance

In relation to the auditor’s assessment of environmental performance (section 4), the Department considers that this section would benefit from clearly identifying where each requirement of Approval condition 229 has been satisfied.

In relation the matters identified by the Department on 14 January 2022:

- management plans (section 4.1), the Department requested an assessment of the conservation works program and all site plans
- impacts (section 4.3), please identify the information source for the ‘aspects’ and ‘predicted impacts’ presented in Table 6 (for example, environmental impact statement, species impact statement, recovery plan, threat abatement plan, detailed area conservation management plans, preferred activity statement, and the relevant section)
- incidents (section 4.5) and complaints (section 4.6), while acknowledging that ‘incident’ is not defined within the Approval, the Department considers the bandicoot death in August 2020 warrants inclusion as an incident. Consistent with the *Independent Audit Post Approval Requirements*, an assessment of the response to complaints and incidents is required

## Department of Planning and Environment

- monitoring and adaptive management (section 4.7), the co-proponents are required to produce a monitoring report for the audit period (Approval condition 219) and undertake a five-year review of the conservation works program and integrated monitoring program (Approval conditions 83 and 220 respectively), however these have not been included
- previous findings (section 4.9), the Department requested this include the status of actions arising from the previous audit report and the subsequent annual environmental reports. Not all actions / recommendations arising from the previous audit report and subsequent annual environmental reports have been included.

#### 4. Auditor considerations

In relation to matters considered relevant by the auditor (section 5.3), the Department considers:

- throughout the audit period, the co-proponents were aware of the Department's concerns regarding compliance with the monitoring and auditing program requirements as follows:
  - on 8 August 2018, the Department briefed the co-proponents on the various issues and its expectations moving forward
  - on 14 September 2018, the Department wrote to the co-proponents identifying that it would be beneficial for annual environmental reports to be prepared in accordance with the *Compliance Reporting Post Approval Requirements* (June 2018)
  - on 11 October 2018, the Department provided comment on the previous draft audit report
  - on 24 March 2021, the Department write to each co-proponent regarding non-submission of subsequent annual environmental reports
  - on 8 November 2021, the Department issued the relevant Directions.
- the Department considers the finding regarding not having reviewed the initial management plans to be also applicable to not having reviewed the management systems / programs and monitoring data / reports, and not having an Environmental Manager or Heritage Advisor fully oversee site activities. The Department considers the commentary regarding the co-proponents' intentions for 2022 to be outside the audit scope.
- Please ensure auditor referencing is accurate – example: Table 5 references Condition 112 and provides “refer to CoA 111 for further details” however Condition 111 is unrelated to Condition 112.

#### 5. Audit Findings

In relation to the compliance assessment (section 5.2 and Appendix A):

- Initial requirements (information management system, condition 66; conservation works program, conditions 31 & 78; induction program, conditions 64 & 65; site plans, conditions 70, 85, 91, 95, 99, 100, 105, 111, 112, 116, 118, 120A, 188, 191 [& 197 & 199 & 203] / Schedule 9, 205; integrated monitoring program, condition 216):



- the Department expects a consistent assessment of the initial requirement as either 'compliant' or 'not compliant', however some initial requirements have been assessed as 'not triggered' (conditions 31 & 78, 99, 105, 112 and 188)
- the Department considers it unlikely that the site programs / plans were still 'compliant' during the audit period given that, except for the Moveable Heritage and Resources Plan (condition 85), they have not been reviewed or updated since first issued in the mid-late 2000s
- Sufficient information (Appendix A) – the Department considers that the audit information (fourth column) is insufficient to support the compliant status (fifth column) in relation to the following:
  - Environmental Manager (condition 52) – the names and start/end dates for all four environmental managers should be included
  - contractor environmental management system (condition 61) – the information described does not demonstrate procurement of contractors that are committed to environmental management
  - induction program (conditions 64, 65) – the revision number / date should be included for the contractor induction program, as well as confirmation of annual refreshers
  - ongoing Aboriginal consultation (condition 74) – two emails with a single individual does not demonstrate ongoing consultation
  - barriers (conditions 148 & 149) – these conditions refer to internal barriers, not the entrance boom gate
- Compliance status – the Department considers that the audit information does not support the compliance status (fifth column) in relation to the following:
  - operating certificate (condition 44) – the Department understands that buildings P21 & P23 were reconstructed for educational purposes (condition 22)
  - conservation works program (conditions 77 to 81) – the Department understands that conservation (as defined) was undertaken during the audit period, however no conservation works program has been prepared since 2006
  - open days (condition 126) and ferry (condition 138) – the Department acknowledges impacts of the covid-19 pandemic, however these conditions were not met
  - vehicle parking (conditions 151c & 153) – the Department does not consider that guest use of the administration precinct car park opposite S1 has been phased out
  - shuttle bus (condition 155) – the Department acknowledges the public bus, however this condition was not met
  - monitoring (conditions 156, 167 / Schedules 5-7, 179 / Schedule 8, 184, 219) – the required monitoring program / data / triggers/ report for the audit report have not been included in the draft report
  - annual environmental reports (conditions 221 & 223) – following submission of the previous comprehensive audit report in 2018, annual environmental reports were not submitted until after the Department wrote to the co-proponents in 2021
  - audit (condition 228) – the previous comprehensive audit was not undertaken within five years of the preceding comprehensive audit.

Department comments on draft Audit Report, and responses tabled.

| DPE comment   | Response  | Report updated yes / no and where.                                  |
|---|---|---|
| <b>Audit scope and methodology</b>  |   |   |
| In relation to the audit scope (section 1.2) and methodology (sections 3.2 & 3.3):  |   |   |
| <ul style="list-style-type: none"> <li>the Department issued the relevant Direction to each co-proponent</li> </ul>   | Updated.  | Yes.<br>Section 1.2.  |
| <ul style="list-style-type: none"> <li>Approval conditions 229g &amp; 230 include reference to the "Heritage Council". Please confirm that Heritage NSW was:               <ul style="list-style-type: none"> <li>consulted on the audit scope, and update section 1.2 and Appendix B accordingly (these reference the EPA and not Heritage NSW)</li> <li>provided at least six weeks to comment on the draft report</li> </ul> </li> </ul> | Heritage NSW was consulted on the audit scope. They did not provide a response.<br><br>All parties (including Heritage NSW) were provided at least 6 weeks to review the draft report. Comments have been captured in the final report. | Yes.<br>Section 1.2, Appendix B.<br>Section 3.2.5 Appendix G and H. |
| <ul style="list-style-type: none"> <li>please identify if any of the interviewees are the Environmental Manager or the Heritage Advisor and, if so, the period they fulfilled the role.</li> </ul>  | The interviewees included the Environmental Managers. Details have been included.<br><br>The Heritage Advisor was not interviewed as part of the audit.   | Yes.<br>Section 3.3.  |
| <b>Activities during the audit period</b>   |   |   |
| In relation to the activities during the audit period (section 2.3), the Department understands that the following also occurred:   |   |   |
| <ul style="list-style-type: none"> <li>construction of two fender piles near the wharf in preparation for the Invictus Games, which were held in October 2018</li> <li>sand replenishment of Quarantine Beach on unknown date(s)</li> <li>conservation works, such as maintenance and environmental management programs.</li> </ul>   | Updated.  | Yes.<br>Section 2.3.  |
| <b>Environmental Performance</b>  |   |   |
| In relation to the auditor's assessment of environmental performance (section 4), the Department considers that this section would benefit from clearly identifying where each requirement of Approval condition 229 has been satisfied.  |   |   |
| In relation the matters identified by the Department on 14 January 2022:  |   |   |
| <ul style="list-style-type: none"> <li>management plans (section 4.1), the Department requested an assessment of the conservation works program and all site plans</li> </ul>   | WolfPeak assessed all the site plans and the report presents the outcome of that review. Refer Section 4.1, tables 4 and 5.   | Yes.<br>Section 4.1.  |
| <ul style="list-style-type: none"> <li>impacts (section 4.3), please identify the information source for the 'aspects' and 'predicted impacts' presented in Table 6 (for example, environmental impact statement, species impact statement, recovery plan, threat abatement plan, detailed area conservation management plans, preferred activity statement, and the relevant section)</li> </ul>   | The aspects and impacts were sourced from Section 4 of the Determination Report as this was the available document to source such information. The EIS was not able to be accessed.   | Yes.<br>Section 4.3.  |
| <ul style="list-style-type: none"> <li>incidents (section 4.5) and complaints (section 4.6), while acknowledging that 'incident' is not defined within the Approval, the Department considers the bandicoot death in August 2020 warrants inclusion as an incident. Consistent with the Independent Audit Post Approval Requirements, an assessment of the response to complaints and incidents is required</li> </ul>                      | Sections 4.5 and 4.6 have been updated in response to this comment.   | Yes.<br>Sections 4.5 and 4.6.                                       |
| <ul style="list-style-type: none"> <li>monitoring and adaptive management (section 4.7), the co-proponents are required to produce a monitoring report for the audit period (Approval condition 219) and undertake a five-year review of the conservation works program and integrated monitoring program (Approval conditions 83 and 220 respectively), however these have not been included</li> </ul>                                    | Updated.  | Yes.<br>Sections 4.7, 5.1 and 5.2.                                  |

| DPE comment  | Response   | Report updated yes / no and where.   |
|--|--|--------------------------------------|
| <ul style="list-style-type: none"> <li>previous findings (section 4.9), the Department requested this include the status of actions arising from the previous audit report and the subsequent annual environmental reports. Not all actions / recommendations arising from the previous audit report and subsequent annual environmental reports have been included.</li> </ul>  | <p>As stated in Section 4.9, Table 7 provides a summary of the status of the previous audit findings as presented in Table 5 of the 2018 compliance audit report (SNC Lavalin, 2021 , pp.19-20). The co-proponents reported that the status of the previous audit findings [2018] as presented in Table 1 (pp.4-7) of the 2018-2019 Annual Environmental Report had not changed given the report was prepared in December 2021. Five findings were closed while five findings remained open.</p> <p>Status of actions arising from the 2020 Annual Environmental Report have been included in Section 4.10.</p>        | <p>Yes.<br/>Section 4.10.</p>        |
| <b>Auditor considerations</b>  |  |                                      |
| In relation to matters considered relevant by the auditor (section 5.3), the Department considers:   |  |                                      |
| <ul style="list-style-type: none"> <li>throughout the audit period, the co-proponents were aware of the Department's concerns regarding compliance with the monitoring and auditing program requirements as follows:               <ul style="list-style-type: none"> <li>on 8 August 2018, the Department briefed the co-proponents on the various issues and its expectations moving forward</li> <li>on 14 September 2018, the Department wrote to the co-proponents identifying that it would be beneficial for annual environmental reports to be prepared in accordance with the Compliance Reporting Post Approval Requirements (June 2018)</li> <li>on 11 October 2018, the Department provided comment on the previous draft audit report</li> <li>on 24 March 2021, the Department write to each co-proponent regarding non-submission of subsequent annual environmental reports</li> <li>on 8 November 2021, the Department issued the relevant Directions.</li> </ul> </li> </ul> | <p>This has been incorporated into the Audit Report.</p>   | <p>Yes.<br/>Section 4.9 and 5.3.</p> |
| <ul style="list-style-type: none"> <li>the Department considers the finding regarding not having reviewed the initial management plans to be also applicable to not having reviewed the management systems / programs and monitoring data / reports, and not having an Environmental Manager or Heritage Advisor fully oversee site activities. The Department considers the commentary regarding the co-proponents' intentions for 2022 to be outside the audit scope.</li> </ul>   | <p>This has been incorporated into the Audit Report.</p>   | <p>Yes.<br/>Section 5.3.</p>         |
| <ul style="list-style-type: none"> <li>Please ensure auditor referencing is accurate – example: Table 5 references Condition 112 and provides “refer to CoA 111 for further details” however Condition 111 is unrelated to Condition 112</li> </ul>  | <p>WolfPeak has reviewed and updated identified errors.</p>  | <p>Yes.<br/>Table 5.</p>             |
| <b>Audit Findings</b>  |  |                                      |
| In relation to the compliance assessment (section 5.2 and Appendix A):   |  |                                      |
| <ul style="list-style-type: none"> <li>Initial requirements (information management system, condition 66; conservation works program, conditions 31 &amp; 78; induction program, conditions 64 &amp; 65; site plans, conditions 70, 85, 91, 95, 99, 100, 105, 111, 112, 116, 118, 120A, 188, 191 [ &amp; 197 &amp; 199 &amp; 203] / Schedule 9, 205; integrated monitoring program, condition 216):               <ul style="list-style-type: none"> <li>the Department expects a consistent assessment of the initial requirement as either 'compliant' or 'not compliant', however some initial requirements have been assessed as 'not triggered' (conditions 31 &amp; 78, 99, 105, 112 and 188)</li> </ul> </li> </ul>   | <p>WolfPeak were engaged to undertake the Independent Audit with the audit period defined as the time period following the undertaking of the previous audit. The audit period is 01/07/18 to 31/12/21.</p> <p>The Auditors acknowledge the nuances and challenges around initial conditions, particularly given the gaps in historical records along with a lack of rigorous auditing, compliance reporting and regulatory oversight over the last ~15 years. Due to the deficiencies in these historical records and processes the Auditors cannot make a consistent assessment across all initial requirements.</p> | <p>No.</p>                           |

| DPE comment  | Response   | Report updated yes / no and where.  |
|--|--|---|
|  | <p>The Auditors have made a judgement on the compliance status of each requirement using our best endeavours and the information made available, and using the categories from the IAPAR. The Auditor notes that our findings are independent of the co-proponents and other relevant stakeholders and agencies.</p> <p>Where there was evidence that satisfied the Auditor that an initial requirement was either compliant or not compliant then WolfPeak has assigned a finding as such (to provide clarity). However in some circumstances initial requirements were clearly not triggered for the audit period and were not able to be suitably verified. In these circumstances a compliance status of compliant or not compliant cannot be assigned.</p> <p>The Auditor also refers to the definition of Not Triggered under the PAR: <i>A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.</i></p> |   |
| <ul style="list-style-type: none"> <li>◦ the Department considers it unlikely that the site programs / plans were still 'compliant' during the audit period given that, except for the Moveable Heritage and Resources Plan (condition 85), they have not been reviewed or updated since first issued in the mid-late 2000s</li> </ul> | <p>The Auditor notes the response above with respect to the audit period.</p> <p>The Auditors have made a judgement on the compliance status of each requirement using our best endeavours and the information made available, and using the categories from the IAPAR. The Auditor notes that our findings are independent of the co-proponents and other relevant stakeholders and agencies.</p>   | No.   |
| <ul style="list-style-type: none"> <li>• Sufficient information (Appendix A) – the Department considers that the audit information (fourth column) is insufficient to support the compliant status (fifth column) in relation to the following:</li> </ul>   |  |   |
| <ul style="list-style-type: none"> <li>◦ Environmental Manager (condition 52) – the names and start/end dates for all four environmental managers should be included</li> </ul>  | Updated.   | Yes.<br>Sections 5.1, 5.2 and Appendix A (Condition 52).                  |
| <ul style="list-style-type: none"> <li>◦ contractor environmental management system (condition 61) – the information described does not demonstrate procurement of contractors that are committed to environmental management</li> </ul>   | Updated.   | Yes.<br>Sections 5.1, 5.2 and Appendix A (Condition 61).                  |
| <ul style="list-style-type: none"> <li>◦ induction program (conditions 64, 65) – the revision number / date should be included for the contractor induction program, as well as confirmation of annual refreshers</li> </ul>   | <p>Compliance is not determined by the revision number / date of the induction program , provided the induction material is current and adequate.</p> <p>Whether annual refreshers have occurred cannot be confirmed.</p>  | Yes.<br>Sections 5.1, 5.2 and Appendix A (Condition 65).                  |
| <ul style="list-style-type: none"> <li>◦ ongoing Aboriginal consultation (condition 74) – two emails with a single individual does not demonstrate ongoing consultation</li> </ul>   | <p>The auditees state that the facility has now been in operation for ~15 years with the design and implementation of protocols and opportunities around Aboriginal heritage having been established well before the current audit period. Further, they advise that operations during the current audit period have not involved the altering of Aboriginal heritage aspects.</p> <p>The Auditors have made a judgement on the compliance status of each requirement using our best endeavours and the information made available, and using the categories from the IAPAR. The</p>   | Yes.<br>Context added to Appendix A (condition 74). No change to finding. |

| DPE comment   | Response  | Report updated yes / no and where.                                    |
|---|---|---|
|   | Auditor notes that our findings are independent of the co-proponents and other relevant stakeholders and agencies.  |   |
| <ul style="list-style-type: none"> <li>◦ barriers (conditions 148 &amp; 149) – these conditions refer to internal barriers, not the entrance boom gate</li> </ul>   | <p>The Auditors acknowledge that the barriers referred to relate to internal barriers. The co-proponents installation of the entrance main gate and control of vehicles at the entry (so as to achieve the performance outcomes of condition 149) negates the need for the internal barriers. On this basis the Auditor considers the current finding to be appropriate.</p> <p>The Auditor notes that our findings are independent of the co-proponents and other relevant stakeholders and agencies.</p>  | <p>Yes.</p> <p>Minor context added to Appendix A (condition 148).</p> |
| <ul style="list-style-type: none"> <li>• Compliance status – the Department considers that the audit information does not support the compliance status (fifth column) in relation to the following</li> </ul>  |   |   |
| <ul style="list-style-type: none"> <li>◦ operating certificate (condition 44) – the Department understands that buildings P21 &amp; P23 were reconstructed for educational purposes (condition 22)</li> </ul>   | <p>The auditees state that P21 and P23 are not education facilities, rather the reconstruction of the buildings for accommodation (i.e.: beds) for educational groups when they attend the site.</p> <p>The Completion Certificate under condition 44(d) was provided.</p>  | <p>Yes.</p> <p>Appendix A (condition 44)</p>                          |
| <ul style="list-style-type: none"> <li>◦ conservation works program (conditions 77 to 81) – the Department understands that conservation (as defined) was undertaken during the audit period, however no conservation works program has been prepared since 2006</li> </ul> | <p>The Auditors refer to the definition of conservation under the Determination Report as being:</p> <p><i>Conservation means all the processes of looking after a place so as to retain its cultural significance. It includes maintenance and may according to circumstance include preservation, restoration, reconstruction and adaptation and may commonly be a combination of more than one of these.</i></p> <p>The Auditors observes condition 77 which states that conservation does not include:</p> <ul style="list-style-type: none"> <li>a) works associated with the planning, design and the physical reconstruction of buildings P21, P22, P23 and H1;</li> <li>b) assessment work or documentation undertaken as part of the preparation of the EIS or PAS, including design drawings;</li> <li>c) assessment work or documentation to be undertaken as part of the preparation of detailed design plans for proposed adaptation work; or</li> <li>d) works completed prior to the commencement date, with the exception of urgent works identified in the DACMP.</li> </ul> <p>Further the works set out by the Conservation Works Program was either completed prior to the current audit period, or not at all (refer condition 78).</p> <p>The auditees reiterated that it considered the works undertaken during the audit period to not constitute conservation works. No conservation works were sighted during the inspection.</p> | <p>No.</p>  |
| <ul style="list-style-type: none"> <li>◦ open days (condition 126) and ferry (condition 138) – the Department acknowledges impacts of the covid-19 pandemic, however these conditions were not met</li> </ul>   | The Auditor acknowledges the Department's position.   | No.   |



| DPE comment  | Response  | Report updated yes / no and where.  |
|--|---|---|
|  | <p>Given it is an offence to not comply with a Public Health Order this CoA was found to be compliant during the audit period where there was no Public Health Order in place.</p> <p>The Auditor notes that our findings are independent of the co-proponents and other relevant stakeholders and agencies and the Auditors retain the finding for these conditions.</p> |   |
| <ul style="list-style-type: none"> <li>vehicle parking (conditions 151c &amp; 153) – the Department does not consider that guest use of the administration precinct car park opposite S1 has been phased out</li> </ul>  | <p>The auditees have responded by reiterating that the parking area is used for check-in parking for the elderly and disabled. There is no day or overnight parking permitted.</p>  | <p>Yes.<br/>Context added to Appendix A (condition 151 and 153). No change to findings.</p> |
| <ul style="list-style-type: none"> <li>shuttle bus (condition 155) – the Department acknowledges the public bus, however this condition was not met</li> </ul>   | <p>Updated.</p>   | <p>Yes.<br/>Sections 5.1, 5.2 and Appendix A (condition 155).</p>                           |
| <ul style="list-style-type: none"> <li>monitoring (conditions 156, 167 / Schedules 5-7, 179 / Schedule 8, 184, 219) – the required monitoring program / data / triggers/ report for the audit report have not been included in the draft report</li> </ul>   | <p>Updated.</p>   | <p>Yes.<br/>Sections 4.7, 5.1, 5.2 and Appendix A (condition 219).</p>                      |
| <ul style="list-style-type: none"> <li>annual environmental reports (conditions 221 &amp; 223) – following submission of the previous comprehensive audit report in 2018, annual environmental reports were not submitted until after the Department wrote to the co-proponents in 2021</li> </ul> | <p>Updated.</p>   | <p>Yes.<br/>Sections 5.1, 5.2 and Appendix A (condition 221 and 223).</p>                   |
| <ul style="list-style-type: none"> <li>audit (condition 228) – the previous comprehensive audit was not undertaken within five years of the preceding comprehensive audit.</li> </ul>  | <p>Updated.</p>   | <p>Yes.<br/>Sections 5.1, 5.2 and Appendix A (condition 228).</p>                           |