

Victorian Desalination Project | Independent Reviewer & Environmental Auditor

IR&EA REPORT

COMPLIANCE WITH ENVIRONMENTAL PERFORMANCE
REQUIREMENTS QUARTER 1 2012

QUARTERLY REPORT TO THE MINISTER FOR ENVIRONMENT AND
CLIMATE CHANGE

April 2012



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SUMMARY

The Victorian Desalination Project (VDP – the Project) is being constructed on the coast in South Gippsland near Wonthaggi by the AquaSure consortium in a public-private partnership with the Victorian Government. The Project includes a desalination plant, a pipeline to transfer water to the Melbourne water distribution network near Cardinia, and an underground power supply, which will be largely in the same alignment as the pipeline. AquaSure has contracted Thiess Degrémont Joint Venture (TDJV) to design and construct, and Degrémont Thiess Services (DTSJV) to operate and maintain the VDP.

The overall environmental management framework for the VDP was initially defined in the Environmental Effects Statement (EES) for the reference project. This framework was further refined and included in the Project Deed as a contractual requirement for both the Design and Construction (D&C) and Operations and Maintenance (O&M) Stages of the Project. The main components of the Environmental Management Framework are:

- The VDP must be designed and constructed in accordance with a set of documented Environmental Performance Requirements, included in Appendix S3 of the Project Deed. In addition, Commonwealth and Victorian environmental legal requirements must be met.
- An Environmental Management System and Environmental Management Plans to support delivery of compliance with the Environmental Performance Requirements; and
- Additional requirements in the Project Deed to support environmental management.

The Independent Reviewer and Environmental Auditor (IR&EA) provides independent oversight of design engineering, construction, and environmental performance of the VDP. The IR&EA is jointly appointed by the State Government and AquaSure; the consortium building the VDP, and which will subsequently operate it. In particular, the IR&EA audits the Project Activities to assess whether the environmental requirements of the Project are being met. The Department of Sustainability and Environment (DSE) Capital Projects Division administers the Contract with AquaSure on behalf of the State.

This report provides a summary of the IR&EA's monthly environmental audit outcomes from January – March 2012.

Works commenced at the desalination plant site on the coast near Wonthaggi on 30 September 2009. The Project Activities occurring during the reporting period were:

- **Plant site:** minor bulk earthworks, civil works, building works, electrical works and mechanical installation. Site revegetation continued outside the construction footprint. Construction verification and cleaning activities continued, including hydro-testing.
- **Utilities alignment:** Reinstatement of the alignment continued during the reporting period. The power cable was successfully energised from the Cranbourne Terminal Station to the Plant site.
- **Marine works:** completion of marine construction activities.

During the reporting period a total of nine formal audit findings were raised, including two Non-compliances and seven Areas for Improvement. A list of all the audit findings, as well as corrective and preventive actions to the end of March 2012 taken by AquaSure and TDJV to close the findings is given in Appendix 1.

The number of audit findings raised this reporting period is lower than Q4 2011. This is consistent with the nature of the Project activities. Work along the Utilities alignment is almost complete, and at the Plant site construction activities are increasingly under cover and on paved surfaces. This reduces the overall environmental risk of construction activities.

As the number of new audit findings has decreased, so has the total number of open findings. The Minister for Environment and Climate Change approved a revised D&C EMP in February 2012 with the State consenting to the revised Environmental Management System (EMS) and Design & Construction Environmental Management Plan (EMP) in March. This allowed the closing of a total of 12 open audit findings (four on the AquaSure EMS and eight on the D&C EMP), all of which were related to environmental management practices not aligned with documented requirements. Over the reporting period a total of 21 audit findings were closed. Nine audit findings remained open at the end of the reporting period, including three Non-compliances.

Two new Non-compliances were raised during the reporting period. One of these relates to not undertaking post construction monitoring of listed species under the Project's *Environment Protection and Biodiversity Conservation Act* (EPBC) approval within the specified time period. The other Non-compliance relates to the absence of an effective internal audit program for the D&C EMP and associated documents.

The activities at the plant site remain of lower environmental risk. The associated environmental risks are well-managed, with no major audit findings related to on-ground management. The approval by the Minister of a revised D&C EMP included

the approval of a Commissioning Environmental Sub Plan. In addition, the Environment Protection Authority (EPA) issued a Section 30A Commissioning Approval, allowing the discharge of wastes from the plant site during commissioning activities. As commissioning activities are scheduled to commence in the next quarter, these approvals provide the required framework for environmental management.

The primary activities along the Utilities alignment related to reinstatement. The environmental risk of these activities is low, and no major audit findings were raised on on-ground environmental management.

The conclusions in relation to the objectives for the Environmental Audits in the Project Deed are given below.

Operation of the Environmental Management System

The AquaSure Environmental Management System (EMS) provides the overall framework for environmental management for the project. The State consented to a revised EMS in March 2012, that included a number of relatively minor amendments. The EMS continues to operate effectively. IR&EA and external audit findings relate to minor issues, largely concerned with documentation.

Implementation of each component of the EMP

The revised D&C EMP, approved by the Minister in February and consented by the State in March 2012, included the Commissioning Environmental Sub Plan, providing a framework for environmental management until handover to the Operations and Maintenance (O&M) phase. The D&C EMP and the Area EMPs remained effective in guiding on-ground environmental management. The environmental risk profile of construction activities continues to decrease as work along the utilities alignment is almost complete, and activities at the plant site are increasingly under cover.

Other Environmental requirements

Construction related Environmental Performance Requirements are integrated into the relevant sub plans of the Area EMPs. Accordingly, the audits of the EMPs provide assurance that the Performance Requirements are being met. In addition, construction requirements and methodologies are defined in Site Establishment Packages and Temporary Works Packages, which refer to the D&C EMP and the Performance Requirements. These packages are certified by the IR&EA.

The design related Performance Requirements are integrated into the relevant Design Package. The IR&EA certification of the Design Packages includes assurance that the related performance requirements have been adequately addressed.

During the reporting period there were no material audit findings which would suggest that the Performance Requirements had not been met.

1 INTRODUCTION

The Victorian Desalination Project (VDP) is being constructed on the coast in South Gippsland near Wonthaggi by the AquaSure consortium in a public-private partnership with the Victorian Government. The project includes the desalination plant, a pipeline to transfer water to the Melbourne water distribution network near Cardinia, and an underground power supply, which will be largely in the same alignment as the pipeline.

Environmental management for both the design and construction, and operational stages of the VDP was a major part of planning for the Project. The Project was the subject of a comprehensive Environment Effects Statement (EES), including a Panel hearing, and requires compliance with a range of environmental requirements and approvals as outlined in the Project Deed between the State and AquaSure. Design and construction of the VDP is being carried out under a formal environmental management framework which includes an overarching Project Environmental Management System (EMS), and specific Environmental Management Plans (EMPs) for the overall Design and Construction (D&C) phase and each area of construction (the plant site, the pipeline and power supply corridor, and the marine works). The Operations and Maintenance (O&M) phase will similarly operate under specific EMPs. In addition a range of environmental requirements have been defined relating to the design and operation of the desalination plant, and to the construction activities.

The Independent Reviewer and Environmental Auditor (IR&EA) provides independent oversight of design engineering, construction, and environmental performance of the VDP. The IR&EA is jointly appointed by the State Government and AquaSure; the consortium building the VDP, and which will subsequently operate it. In particular, the IR&EA audits the Project Activities to assess whether the environmental requirements of the Project are being met. The Department of Sustainability and Environment (DSE) Capital Projects Division administers the contract with AquaSure on behalf of the State.

This report provides a summary of the IR&EA's monthly environmental audit outcomes from January – March 2012.

2 THE VDP ENVIRONMENTAL MANAGEMENT FRAMEWORK

The overall environmental management framework for the VDP was initially defined in the Environmental Effects Statement (EES) for the reference project. This framework was further refined and included in the Project Deed as contractual requirements for both the Design and Construction (D&C) and Operations and Maintenance (O&M) phases of the Project. The main components of the Environmental Management Framework are:

- The VDP must be designed and constructed in accordance with a set of documented Environmental Performance Requirements, included in Appendix S3 of the Project Deed. In addition, Commonwealth and Victorian environmental legal requirements must be met.
- An Environmental Management System and Environmental Management Plans to support delivery of compliance with the Environmental Performance Requirements; and
- Additional requirements in the Project Deed to support environmental management.

The main elements of the Environmental Management Framework for the D&C stage are summarised below.

2.1 Environmental performance requirements

The Project Deed, in Appendix S3, sets out over 200 individual Environmental Performance Requirements in 39 environmental areas. They apply variously to the D&C and/or the O&M stages of the Project, and are required to be met as a condition of the Project Deed. Many of the Environmental Performance Requirements must be considered in the design of the desalination plant, to ensure that operational environmental performance requirements can be met.

Some of the Environmental Performance Requirements are relevant to construction activities. The D&C EMPs should effectively incorporate these requirements, and include mechanisms to ensure that they are met.

Specific project approvals, and general environmental requirements are necessary under both Commonwealth and Victorian legislation. Some of the key environmental legal requirements derive from the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* and Victorian legislation including the *Environment Effects Act 1978*, the *Environment Protection Act 1970*, the *Planning and Environment*

Act 1987, the Flora and Fauna Guarantee Act 1988 and the Wildlife Act 1975. A full list of applicable legislation is given in the Technical Appendix 2 of the EES.

AquaSure must have a process to manage the identification of the compliance requirements associated with all the Environmental Performance Requirements, including approvals. In addition, AquaSure must identify how they will comply with these requirements and track progress of compliance actions.

2.2 EMS and EMPs

The Project is being designed and constructed, and will be operated, under the guidance of a set of formal environmental management documents:

- AquaSure maintains an overarching project Environmental Management System (EMS), which is required to be independently certified to the Australian and International standard AS/NZS ISO 14001:2004¹. The EMS guides all aspects of environmental management for the project, including on-the-ground management of environmental issues and risks, as well as supporting mechanisms such as compliance management, delivery of relevant training, communication, auditing, inspections and monitoring.
- Specific documented Environmental Management Plans (EMPs) for the Plant Site, the Utilities corridor (covering the construction of the transfer pipeline and the underground power supply), and the marine intake and outlet structures. These Area EMPs are consistent with AquaSure's EMS, and include explicit requirements defined in Appendix S3 of the Project Deed. They are managed by AquaSure as part of their obligations under the Project Deed, and maintained by the D&C contractor, Thiess Degrémont Joint Venture (TDJV).

2.3 Other project environmental requirements

The Project Deed defines a number of other environmental conditions. The key ones are included in Appendix S3 and include:

- The appointment by AquaSure of a suitably qualified Environmental Management Representative (EMR), with appropriate resources to manage the implementation of the EMPs and to monitor compliance with the Environmental Requirements.
- Requirements for management of environmental incidents, provision of environmental training, control by AquaSure of subcontractors, and reporting and auditing.

¹ AS/NZS ISO 14001:2004. Environmental management systems. Requirements with guidance for use.

² AS/NZS ISO 19011:2002. Guidelines for quality and/or environmental management systems auditing

The Project Deed also includes requirements for revision and approval of the EMS and EMPs, and for communication on environmental matters between AquaSure, the State and the IR&EA.

2.4 IR&EA environmental audits

The IR&EA is currently required under the Project Deed to conduct monthly audits of the Project Activities to determine whether they have been undertaken in accordance with the EMS, the EMP and Environmental Requirements.

The independent environmental audits are carried out on a rolling monthly basis. Audit and surveillance activities include field surveillance of construction activities, formal audits of the EMS and subordinate D&C and Area EMPs, and review of design documentation for compliance with design-based environmental performance requirements.

A risk-based approach is used to select the monthly activities and areas for surveillance and audit. AquaSure is required by the Project Deed to provide a Certificate of Environmental Compliance to the IR&EA and the State confirming that the Project Activities have been carried out in accordance with the EMP and the Environmental Requirements. These certificates are to be provided monthly on the first business day of each month.

The IR&EA has developed a Verification and Monitoring Plan under which all audit and surveillance activities are carried out.

Monthly Environmental Audit Reports are provided to AquaSure and the State, providing a summary of the audit activities, findings and conclusions.

As a condition of the D&C EMP approval, quarterly reports are prepared for the State to provide to the Minister for Environment and Climate Change on performance against the environmental requirements of the Project Deed, based on the findings of the monthly environmental audits. This report provides a summary of the environmental audit activities and outcomes conducted from January – March 2012. In addition the Design Review and Certification process provides evidence that the Project design is in accordance with the Environmental Performance Requirements defined in the Project Deed.

3 CONDUCT OF ENVIRONMENTAL AUDITS

The overall conduct of the environmental audits is consistent with the conduct of audit activities given in ISO 19011:2002². The required timing of audit activities, including conducting audits and reporting, is defined in the Project Deed. An overview of the audit process is provided below and is shown in Figure 1 at the end of this section.

The environmental audits assess whether environmental management arrangements, as defined by AquaSure and approved by the State, in the EMS and D&C and Area EMPs, are being implemented. The environmental audits also address whether environmental risks are being adequately managed, and whether the Project Environmental Requirements are being met.

3.1 Audit objective

The objective for the environmental audit is given in clause 13.9 of the Project Deed, which requires that *“the Independent Reviewer & Environmental Auditor ... form an opinion as to whether or not the Environmental Management Plan and Environmental Requirements are being complied with, ... [and] to assess performance in relation to:*

- *the operation of the Environmental Management System;*
- *the implementation of each component of the Environmental Management Plan; and*
- *each other Environmental Requirement.”*

Environmental requirements are set out in Appendix S3 (Environmental Requirements) of the Project Deed, Environmental Approvals, and Ministers' requirements.

The environmental audits focus on:

- Construction-related Environmental Performance Requirements (including conditions of environmental approvals), which are the subject of a monthly rolling audit program designed to determine conformance with the EMS and D&C EMPs;
- Specific requirements of the EMS, D&C EMP, D&C Area EMPs, and subordinate documents which relate to the implementation of the overall EMS and EMPs; and

² AS/NZS ISO 19011:2002. Guidelines for quality and/or environmental management systems auditing

- Design-related Environmental Performance Requirements, conformance with which is assessed through audits of AquaSure/TDJV's internal processes for integrating Performance Requirements into design requirements, and during the Design Review and Certification process.

3.2 Pre-audit activities

The audit activities for each month period are determined through the following activities:

1. **Review of the Construction Program** to identify the Project Activities occurring during the audit period.
2. **Review of the AquaSure/TDJV Environmental Risk Registers** to identify environmental risks relevant to the identified Project Activities, and the related identified controls (EMP Sub Plans or other requirements). The relevant elements of the controls form part of the audit criteria.
3. **Review of the IR&EA field surveillance checklist and results of previous audits** to identify any areas in which the planned environmental arrangements may not be met.
4. **Review of EMS and EMP requirements.** EMS and EMP requirements not directly related to control of identified environmental risks (e.g. training, communication, document and record management requirements) are reviewed to identify any key requirements which should form part of the audit.
5. **Review of the relevant environmental approvals.** The environmental approvals relevant to the identified Project Activities are reviewed to identify compliance requirements. The key compliance requirements are generally integrated into the Area EMPs, and are included as part of the audit criteria.
6. **Review of AquaSure and TDJV records** relating to: internal audits; environmental monitoring; non-conformance, corrective and preventive actions; and incidents.
7. **Confirmation of audit criteria and development of checklists.** Audit criteria are developed from the audit areas identified in the tasks above and included in checklists which are used to guide audit interviews, records reviews and inspections.

3.3 Audit scope

A scope for each audit is defined, and generally includes:

- AquaSure EMS implementation, including the responsibilities of the Environmental Management Representative (EMR) as required in Appendix S3 of the Project Deed;
- Implementation of the requirements of the D&C EMP;

- Implementation of the D&C Area EMPs as related to high risk areas identified by the AquaSure/TDJV environmental risk identification and management processes.

3.4 Audit reference documents

Audit reference documents are defined, relevant to the project activities and audit scope. These are generally the relevant EMP, and particularly the relevant sub plan. Specific audit issues are identified from the reference documents, and included in a checklist, which are completed with audit observations and evidence each month and maintained as audit records.

3.5 Audit activities

Audit and surveillance activities include:

- Field surveillance of construction activities;
- Formal audits of the EMS and subordinate D&C and Area EMPs, both in the field to check on-ground compliance with environmental management arrangements, and office-based audits to assess the implementation of necessary environmental management procedures and processes; and
- Review of design documentation for compliance with design-based environmental performance requirements.

Activities and areas for surveillance and audit activities are chosen monthly on a risk basis.

3.6 Audit findings classification

Audit findings are classified according to the following definitions:

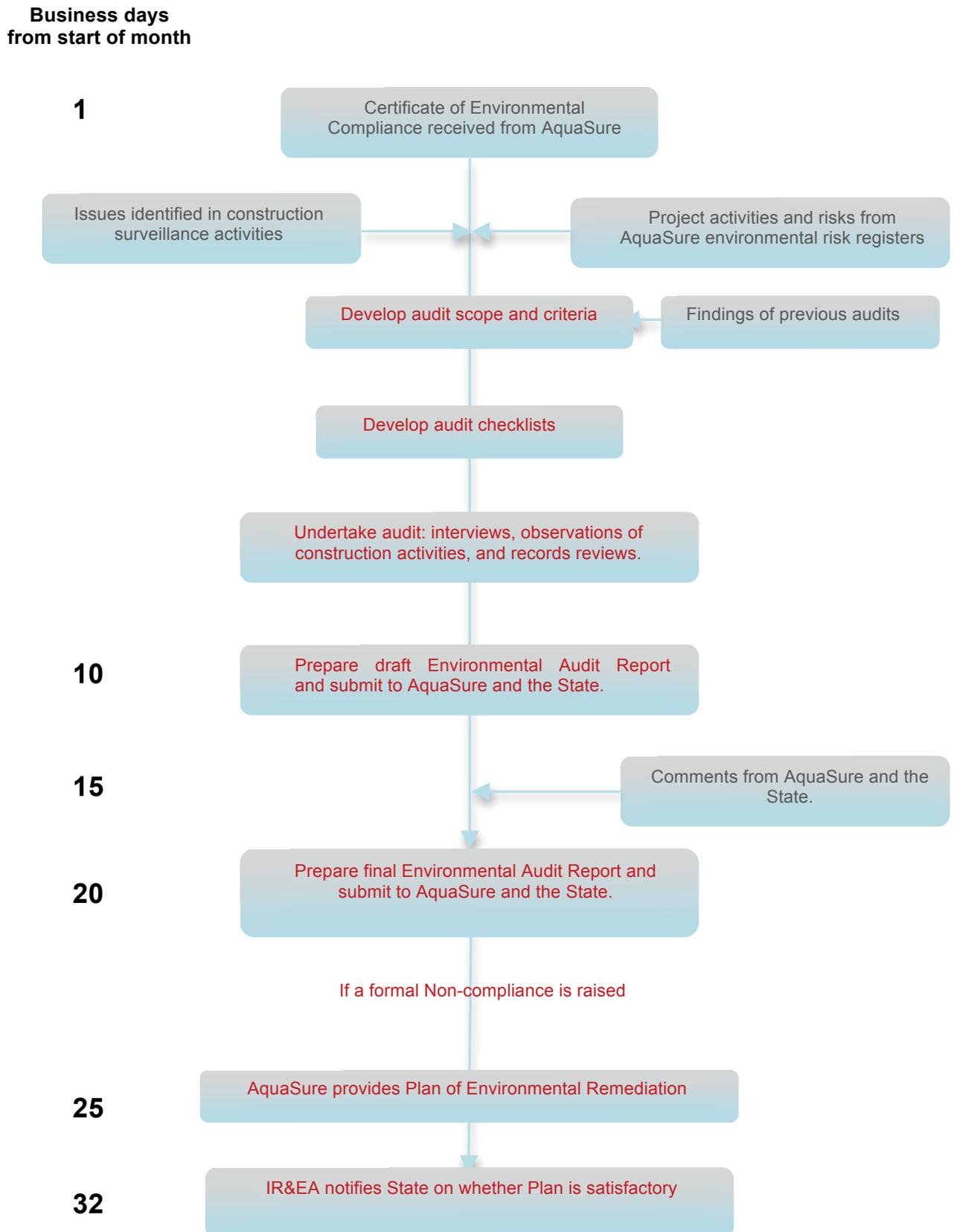
Non-compliance: The absence of, or the failure to implement and maintain, one or more requirements of the relevant EMP or subordinate documentation, or a situation, which would, on the basis of available objective evidence raise significant doubt as to the effectiveness of environmental management.

Note: A non-compliance may be an individual non-compliance or a number of minor but related audit non-conformances, which when considered in total are judged to constitute a non-compliance.

Area for improvement: A deficiency in the implementation of the relevant EMP or subordinate documentation judged to be a risk to the environment, or to environmental management, without constituting an overall failure in the area concerned.

Observation: An audit finding which may relate to an incidental or isolated system discrepancy, which does not compromise the effectiveness of environmental management, or constitute an actual or potential environmental risk.

Figure 1. Overview of the environmental audit process



4 PROJECT ACTIVITIES AND ENVIRONMENTAL AUDITS

4.1 Project activities

The Project Activities occurring during the reporting period were:

- **Plant site:** minor bulk earthworks, civil works, building works, electrical works and mechanical installation. Site revegetation continued outside the construction footprint. Construction verification and cleaning activities continued, including hydro-testing.
- **Utilities alignment:** Reinstatement of the alignment continued during the reporting period. The power cable was successfully energised from the Cranbourne Terminal Station to the Plant site.
- **Marine works:** completion of marine construction activities.

Views of these construction activities are shown in Figures 2 and 3 below.

Figure 2. Growth on the Green Roof, Plant Site February 2012

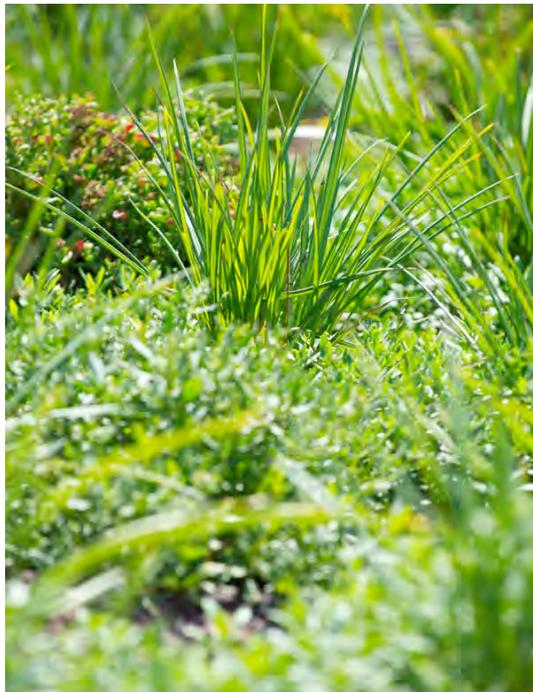


Photo courtesy TDJV

Figure 3. Reinstatement of the Utilities alignment, January 2012



Photo courtesy TDJV

4.2 Environmental audits

The IR&EA conducted the following audits during the reporting period:

Audit No	Date	Scope
123	13/1/2012	Office audit of implementation of the Environmental Management Representative's (EMR's) responsibilities and relevant requirements of the Project Deed
124	17/1/2012	Office audit of documentation and records related to requirements of the D&C EMP
125	11/1/2012	Field audit of implementation of key requirements and sub-plans of the D&C Plant and General Area EMP
126	12/1/2012	Field audit of implementation of key requirements and sub-plans of the D&C Utilities Area EMP
127	17/1/2012	Office audit of the implementation of the Baseline Marine Monitoring Program
128	8/2/2012	Office audit of implementation of the Environmental Management System (EMS), and the Environmental Management Representative's (EMR's)

Audit No	Date	Scope
		responsibilities and relevant requirements of the Project Deed
129	6/2/2012	Office audit of documentation and records related to requirements of the D&C EMP
130	9/2/2012	Field audit of implementation of key requirements and sub-plans of the D&C Plant and General Area EMP
131	7/2/2012	Field audit of implementation of key requirements and sub-plans of the D&C Utilities Area EMP
132	6/2/2012	Office audit of the implementation of the Baseline Marine Monitoring Program
133	6/2/2012	Office audit of the implementation of the D&C Marine Area EMP
134	9/3/2012	Office audit of implementation of the Environmental Management System (EMS), and the Environmental Management Representative's (EMR's) responsibilities and relevant requirements of the Project Deed
135	7/3/2012	Office audit of documentation and records related to requirements of the D&C EMP
136	8/3/2012	Field audit of implementation of key requirements and sub-plans of the D&C Plant and General Area EMP
137	6/3/2012	Field audit of implementation of key requirements and sub-plans of the D&C Utilities Area EMP
138	7/3/2012	Office audit of the implementation of the Baseline Marine Monitoring Program
139	7/3/2012	Office audit of the implementation of the D&C Marine Area EMP

5 AUDIT FINDINGS AND CONCLUSIONS

5.1 Audit findings

During the reporting period a total of nine formal audit findings were raised, including two Non-compliances and seven Areas for Improvement. No Observations were raised. A list of all the audit findings, as well as corrective and preventive actions to the end of March 2012 taken by AquaSure and TDJV to close the findings is given in Appendix 1.

A summary of the numbers of audit findings is given in Table 1 below.

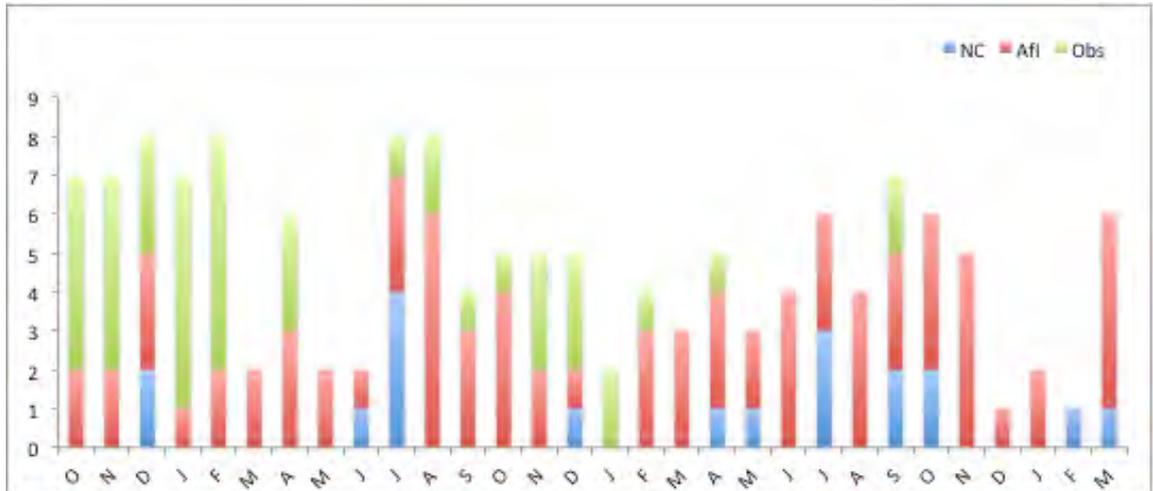
Table 1. Summary of environmental audit findings Q1 2012

Audit finding type	No. Open at Jan '12	No. Raised Jan – Mar '12	No. Closed Jan-Mar '12
Non Compliance	6	2	5
Area for Improvement	11	7	12
Observation	4	0	4
Totals	21	9	21

The number of audit findings raised this reporting period is lower than Q4 2011. This is consistent with the nature of the Project activities. Work along the Utilities alignment is almost complete, and at the Plant site construction activities are increasingly under cover and on paved surfaces. This reduces the overall environmental risk of construction activities.

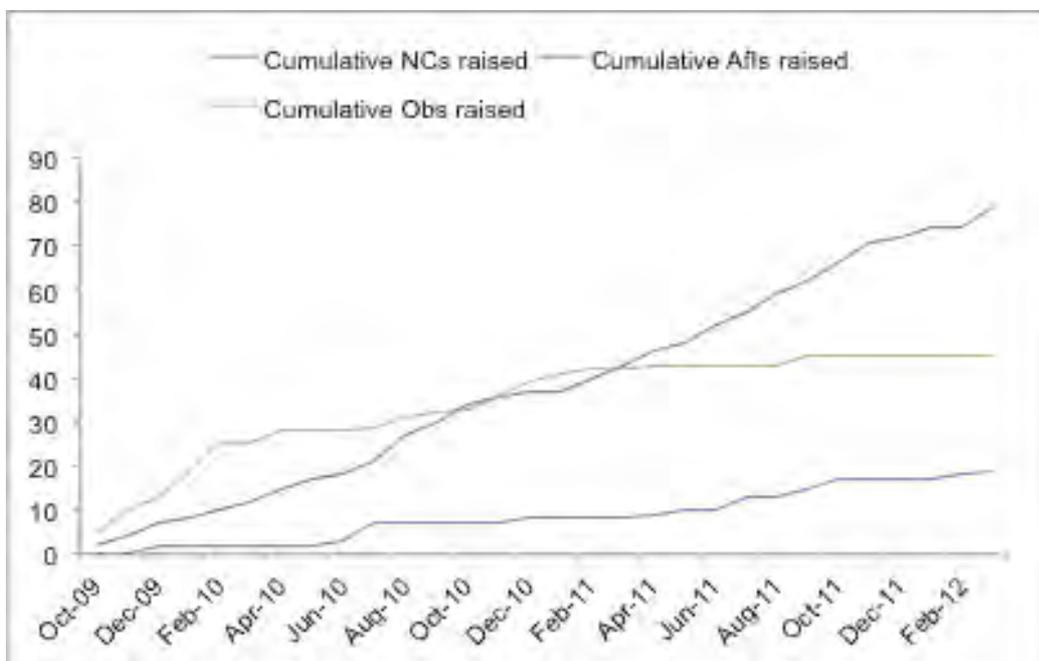
The number of each type of audit finding raised each month since project inception is given in Figure 4 below.

Figure 4. Audit findings by category.



The overall number of audit findings raised (and closed) since the project started is given in Figure 5 below.

Figure 5. Cumulative number of audit findings, Project inception to date.



As the number of new audit findings has decreased, so has the total number of open findings. In February 2012 the Minister for Environment and Climate Change approved a revised D&C EMP. The State consented to the revised D&C EMP and the AquaSure EMS in March. The approvals allowed the closing of a total of 12 open audit findings (four on the AquaSure EMS and eight on the D&C EMP), all of which were related to environmental management practices not matching documented requirements. Over the

reporting period a total of 21 audit findings were closed. Nine audit findings remained open at the end of the reporting period, including three Non-compliances.

Two new Non-compliances were raised during the reporting period. One of these relates to not undertaking post construction monitoring of listed species under the Project's EPBC Act approval within the specified time period. The other Non-compliance relates to the absence of an effective internal audit program for the D&C EMP and associated documents.

The activities at the plant site remain of lower environmental risk. The associated environmental risks are well-managed, with no major audit findings related to on-ground management. The approval by the Minister of a revised D&C EMP included the approval of a Commissioning Environmental Sub Plan. In addition, the EPA issued a Section 30A Commissioning Approval, allowing the discharge of wastes from the plant site during commissioning activities. As commissioning activities are scheduled to commence in the next quarter, these approvals provide the required framework for environmental management.

Figure 6. Litter awareness campaign, Plant Site, January 2012



Figure 7. Construction of a temporary sediment pond, Plant Site, February 2012



The primary activities along the Utilities alignment related to reinstatement. The environmental risk of these activities is low, and no major audit findings were raised on on-ground environmental management.

Figure 8. Protection of a heritage site, Utilities alignment, February 2012.



Figure 9. Road sweeper, Utilities alignment, February 2012



5.2 Audit conclusions

The conclusions in relation to the objectives for the Environmental Audits in the Project Deed are given below.

5.2.1 Operation of the Environmental Management System

The AquaSure Environmental Management System (EMS) provides the overall framework for environmental management for the project. The State consented to a revised EMS in March 2012, that included a number of relatively minor amendments. The EMS continues to operate effectively. IR&EA and external audit findings relate to minor issues, largely concerned with documentation.

5.2.2 Implementation of each component of the EMP

The revised D&C EMP, approved by the Minister in March 2012, and including the Commissioning Environmental Sub Plan, provides a framework for environmental management until handover to the Operations and Maintenance (O&M) phase. The D&C EMP and the Area EMPs remained effective in guiding on-ground environmental management. The environmental risk profile of construction activities continues to decrease as work along the utilities alignment is almost complete, and activities at the plant site are increasingly under cover.

5.2.3 Other Environmental requirements

Construction related Environmental Performance Requirements are integrated into the relevant sub plans of the Area EMPs. Accordingly, the audits of the EMPs provide assurance that the Performance Requirements are being met. In addition, construction

requirements and methodologies are defined in Site Establishment Packages and Temporary Works Packages, which refer to the D&C EMP and the Performance Requirements. These packages are certified by the IR&EA.

The design related Performance Requirements are integrated into the relevant Design Package. The IR&EA certification of the Design Packages includes assurance that the related performance requirements have been adequately addressed.

During the reporting period there were no material audit findings which would suggest that the Performance Requirements had not been met.

Appendix 1. Environmental audit findings Q1 2012

The following table summarises the audit findings which were open at the beginning of the reporting period, and those raised during the reporting period.

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
2	Oct-09	O	2/04	<p>The roles and responsibilities of the Environmental Management Representative as defined in Appendix S3, Clause 2 of the PS&PR have been only partially implemented in the following areas:</p> <p>the role of the EMR in environmental communication channels is not clearly defined (subclause (vii)).</p> <p>While the EMR provided evidence of involvement in internal and external environmental communications, these responsibilities are not formally defined in the EMS. The EMS Manual (at section 4.4.2) references the Community Involvement Plan, which does not include defined communications responsibilities for the EMR.</p>	<p>December 2009: Update EMS s4.4.2 & s4.4.3, and the AquaSure CIP, to reflect what external communication input the EMR is involved with.</p> <p>January 2010: the identified action is still being implemented</p> <p>February 2010: the identified action is still being implemented</p> <p>March 2010: the identified action is still being implemented</p> <p>April 2010: the following draft documents are under preparation:</p> <ul style="list-style-type: none"> • Draft protocol for communication with external agencies • Draft protocol for communication with stakeholders on environment issues and complaints • Draft revised CIP; including definition of EMR roles and responsibilities <p>May 2010: The role of the EMR in environmental communication channels is to be defined in the revised EMS Manual and in the Community Involvement Plan. The mechanism has been prepared and approved internally and will be presented to the Environmental Agency Group.</p> <p>June 2010: The mechanism was presented to the EAG, which provided no comments. Finding to remain open until the EMS and revised CIP are formally approved by DSE</p> <p>July 2010: EMR is involved in communication channels through the Community Involvement Manager. The CIP has not yet been formally amended to include a formal process. Finding to remain open until the EMS and revised CIP are formally approved by DSE.</p> <p>August 2010: CIP revision not yet completed.</p> <p>September 2010: A revised CIP had been submitted to DSE for formal approval as a revised Project Plan. This finding to remain open until the revised CIP is formally approved.</p> <p>November 2010: the CIP has been revised in response to comments from DSE, and is awaiting a revised TDJV CIP before being finalised and resubmitted to DSE for approval.</p> <p>December 2010: Action is on-going</p> <p>January 2011: CIP not yet approved.</p> <p>February 2011: DSE has some minor comments still outstanding.</p> <p>March 2011: The revised draft of the CIP adequately addresses</p>	<p>Finding Closed Audit No 123 January 2012</p>

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					<p>the role of the EMR. The CIP is to be revised for other purposes, and to be submitted for state consent. This finding to remain open until the revised CIP has received consent.</p> <p>April 2011: The CIP is still to be submitted for State consent.</p> <p>May 2011: The CIP is still to be submitted for State consent.</p> <p>June 2011: The CIP is still to be submitted for State consent.</p> <p>July 2011: The CIP has still to receive State and IR&EA consent</p> <p>August 2011: The CIP has still to receive State and IR& EA consent</p> <p>September 2011: The CIP has still to receive State and IR&EA consent</p> <p>October 2011: The CIP has still to receive State and IR&EA consent</p> <p>November 2011: The CIP has still to receive State and IR&EA consent</p> <p>December 2011: The CIP has still to receive State and IR&EA consent</p> <p>January 2012: The CIP has been finalised with all outstanding matters addressed. Finding Closed.</p>	
49	6-Oct-2010	Obs	49/01	AquaSure EMS Manual, 9.5.1 AquaSure Audits. The AquaSure EMR is the internal auditor, but he is not registered in accordance with Att E.4	<p>November 2010: No action</p> <p>December 2010: No further action. Revision to EMS being considered.</p> <p>January 2011: Action is on going. A management review to be arranged to consider EMS revisions.</p> <p>February 2011: Management Review meeting scheduled for 16 February.</p> <p>March 2011: Management review meeting held on 21 February. Minutes provided noting approval of revision. A revised EMS is to be submitted for State consent.</p> <p>April 2011: The revised EMS is still to be submitted for State consent.</p> <p>May 2011: The revised EMS is still to be submitted for State consent.</p> <p>June 2011: The revised EMS is still to be submitted for State consent</p> <p>July 2011: The revised EMS is still to be submitted for State consent</p> <p>August 2011: The revised EMS is still to be submitted for State consent</p> <p>September 2011: The revised EMS is still to be submitted for State consent</p>	Finding Closed Audit No 134, March 2012

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					<p>October 2011: The revised EMS is still to be submitted for State consent</p> <p>November 2011: The revised EMS is still to be submitted for State consent</p> <p>December 2011: The revised EMS is still to be submitted for State consent</p> <p>January 2012: The revised EMS is still to be submitted for State consent</p> <p>February 2012: The revised EMS has been submitted for State consent</p> <p>March 2012: The revised EMS has received consent. Finding Closed.</p>	
54	4-Nov-2010	Obs	54/01	AquaSure EMS Manual. 7.5 Legal and other requirements. Standards Australia publications are not regularly checked or reviewed unless included in the notification by LawLex. It is noted this may not be relevant for environmental standards.	<p>December 2010: Requirement to review Standards Australia publications to be removed from EMS. Still to be completed</p> <p>January 2011: Action is on-going. A management review is to approve revision.</p> <p>February 2011: Management Review meeting scheduled for 16 February.</p> <p>March 2011: Management review meeting held on 21 February. Minutes provided noting approval of revision. A revised EMS is to be submitted for State consent.</p> <p>April 2011: The revised EMS is still to be submitted for State consent.</p> <p>May 2011: The revised EMS is still to be submitted for State consent.</p> <p>June 2011: The revised EMS is still to be submitted for State consent</p> <p>July 2011: The revised EMS is still to be submitted for State consent</p> <p>August 2011: The revised EMS is still to be submitted for State consent</p> <p>October 2011: The revised EMS is still to be submitted for State consent</p> <p>November 2011: The revised EMS is still to be submitted for State consent</p> <p>December 2011: The revised EMS is still to be submitted for State consent</p> <p>January 2012: The revised EMS is still to be submitted for State consent</p> <p>February 2012: The revised EMS has been submitted for State consent</p> <p>March 2012: The revised EMS has received consent. Finding</p>	Finding Closed Audit No 134, March 2012

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					Closed.	
54	4-Nov-2010	Obs	54/02	AquaSure EMS Manual. 9.2 Non-conformity, corrective and preventative actions. Non-conformities are not managed in accordance with the AquaSure procedure "Non Compliance, Corrective and Preventive Action" AQS-SYS-PR003. The EMR has developed a separate audit findings register.	<p>December 2010: AQS NC procedure may be revised to accommodate EMRs process. In progress</p> <p>January 2011: Action is on-going. Management review meeting to endorse change.</p> <p>February 2011: Management Review meeting scheduled for 16 February.</p> <p>March 2011: Management review meeting held on 21 February. Minutes provided noting approval of revision. A revised EMS is to be submitted for State consent.</p> <p>April 2011: The revised EMS is still to be submitted for State consent.</p> <p>May 2011: The revised EMS is still to be submitted for State consent.</p> <p>June 2011: The revised EMS is still to be submitted for State consent</p> <p>July 2011: The revised EMS is still to be submitted for State consent</p> <p>August 2011: The revised EMS is still to be submitted for State consent</p> <p>September 2011: The revised EMS is still to be submitted for State consent</p> <p>October 2011: The revised EMS has been submitted to DSE and the IR&EA for comment</p> <p>November 2011: The revised EMS is still to be submitted for State consent</p> <p>December 2011: The revised EMS is still to be submitted for State consent</p> <p>January 2012: The revised EMS is still to be submitted for State consent</p> <p>February 2012: The revised EMS has been submitted for State consent</p> <p>March 2012: The revised EMS has received consent. Finding Closed.</p>	Finding Closed Audit No 134, March 2012

AUDIT NO.	DATE	TYPE	FINDING NO.	FINDING	ACTION	STATUS
84	11/05/11	N	84/01	<p>D&C EMP Resource Efficiency Sub Plans. Waste Management Report 2010. Data are not available to support the statements of recycling in the Waste Management Report. The amount of recyclable waste in general waste has not been reliably quantified. Data are not well presented and do not clearly identify how recycling rates were generated.</p>	<p>TDJV response: A Waste Assessment consultant has been engaged to conduct on site waste assessments for both the Plant Site and Utilities Corridor. The first round of assessments will be conducted on 15 and 16 June 2011 and will continue on a monthly basis. The assessments will be used to develop and assess quantifiable monthly achievements of waste targets. Quarterly reviews of the waste data will commence in the second quarter 2011 against the waste assessment data obtained.</p> <p>June 2011: Actions are on-going July 2011: Waste assessments have been done, waiting for report. August 2011: Draft waste assessment report received by TDJV for comment. TDJV will review second monthly assessment before setting targets. September 2011: Monthly data gathering to continue. Development of targets to be done recognising the stage of construction. October 2011: TDJV is developing a monthly reporting approach, with reporting against targets and recommendations developed in the previous month. This will take into account the stage of construction and anticipated wastes. November 2011: Project wide waste report has been received from consultant. This includes an action list. The waste assessments are to be continued each month. Waste targets are to be tracked. December 2011: Draft October Waste Assessment sighted, which provides whole of project waste data and actions. January 2012: The quarterly reviews of waste data are to commence this quarter. February 2012: A draft of the quarterly review is due within a week. March 2012: The quarterly review is not yet done.</p>	Remains open

AUDIT NO.	DATE	TYPE	FINDING NO.	FINDING	ACTION	STATUS
90	8/06/11	Afl	90/02	D&C EMP Plant and General Area Noise and Vibration sub plan. The sub plan does not systematically reflect the noise management undertaken at the plant site, including the planning and scheduling of potentially noisy activities.	<p>July 2011: The revisions are in draft form</p> <p>August 2011: The revisions are in draft.</p> <p>September 2011: The revisions are in draft.</p> <p>October 2011: A revised sub plan has been submitted to the State and the IR&EA for comment as part of a broader revision of the D&C EMP.</p> <p>November 2011: The revised D&C EMP is to be formally submitted for approval.</p> <p>December 2011: The revised D&C EMP is to be formally submitted for approval</p> <p>January 2012: The revised D&C EMP is to be formally submitted for approval</p> <p>February 2012: The revised D&C EMP has been submitted to the Minister for approval.</p> <p>March 2012: The revised D&C EMP has been approved. Finding Closed.</p>	Finding Closed Audit No 136, March 2012
95	11/07/11	N	95/01	D&C EMP Plant and General Area. Risk Register. Construction verification and cleaning activities have been conducted on site since April, but are not yet included in the environmental risk register. Accordingly, any required controls have not been formally identified and included in the EMP. It is noted that work required to identify the required revisions to the D&C EMP has been underway for several months, and is not yet finalised.	<p>TDJV response:</p> <p>The TDJV D&C EMP Risk Assessment has been updated to include construction verification and cleaning activities and was submitted to IR&EA for comments. Based on the return comments all sub-plan are currently being amended to include small introduction sections on project phases and linked to CESP. Once complete this will be submitted to state for approval. All onsite activities have been included in the revised RA which is being implemented on site but has not yet been signed off by the State.</p> <p>August 2011: The risk register is being revised as part of an overall revision of the D&C EMP</p> <p>September 2011: The risk register is being revised as part of an overall revision of the D&C EMP</p> <p>October 2011: the final revisions have been provided to the IR&EA for review.</p> <p>November 2011: The revised D&C EMP is to be formally submitted for approval</p> <p>December 2011: The revised D&C EMP is to be formally submitted for approval.</p> <p>January 2012: The revised D&C EMP is to be formally submitted for approval</p> <p>February 2012: The revised D&C EMP has been submitted to the Minister for approval.</p> <p>March 2012: The revised D&C EMP has been approved. Part D Notice received 22/3/12. Finding closed.</p>	Finding Closed, Audit No 136, March 2012

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
98	5/08/11	Afl	98/01	AquaSure EMS, document review and approval. The role of the EMR in reviewing key environmental procedures is not formally documented in the EMS.	<p>September 2011: Revisions to the EMS are being prepared for discussion with DSE, as the EMS needs to meet both Project Deed requirements and certification requirements.</p> <p>October 2011: The process for EMR review of key environmental procedures has been included in the revised EMS.</p> <p>November 2011: The EMS revisions are not yet finalised.</p> <p>December 2011: the revision to the EMS is not yet finalised.</p> <p>January 2012: a revision to the EMS has been drafted for consideration.</p> <p>February 2012: The revised EMS has been submitted for State consent</p> <p>March 2012: The revised EMS has received consent. Finding Closed</p>	Finding Closed Audit No 134, March 2012
99	5/08/11	Afl	99/01	D&C EMP, 8.5 Operational Management control. The process of review approval and implementation of environmentally relevant operational controls is not formally audited by the TDJV Environment Manager, and accordingly the effectiveness of this review and approval process cannot be assessed by TDJV.	<p>TDJV response: The process of review approval and implementation of environmentally relevant operational controls will be formally audited by the TDJV Environment Manager.</p> <p>September 2011: audit not currently in TDJV internal audit schedule which goes out to Feb 2012.</p> <p>October 2011: TDJV will revise the audit schedule to include environmentally relevant operational controls.</p> <p>November 2011: Audit schedule not yet revised.</p> <p>December 2011: Audit schedule to be discussed with AquaSure .</p> <p>January 2012: The audit schedule is still to be finalised.</p> <p>February 2012: The audit schedule has not yet been finalised.</p> <p>March 2012: A draft, unapproved audit schedule was provided after the audit. The schedule does not include all operational controls. This finding closed and replaced with Finding No 135/02</p>	Finding Closed Audit No 135, March 2012
99	5/08/11	Afl	99/02	D&C EMP 8.5 Operational Management control. The process used in practice by the Area Environment Managers for involvement in the development, and where applicable sign off, of documents below the level of D&C EMP Sub Plans (such as Work Packs, Work Area Packs, Temporary Work Packs, environmental procedure and the like) is not consistent with the process outlined in the D&C EMP. The current process of approval and authorisation used by the AquaSure EMR, the TDJV Environment Manager and the TDJV Stakeholder Director, is not reflected in the D&C EMP.	<p>TDJV response: The current process of approval and authorisation used by the AquaSure EMR, the TDJV Environment Manager and the TDJV Stakeholder Director will be reflected in the D&C EMP to be reissued for consent.</p> <p>September 2011: to be included in next revision of D&C EMP.</p> <p>October 2011: to be included in next revision of D&C EMP.</p> <p>November 2011: to be included in the next revision of the D&C EMP</p> <p>December 2011: the revised D&C EMP includes this approval process.</p> <p>January 2012: the revised D&C EMP is to be submitted for DSE consent.</p>	Finding Closed Audit No 135, March 2012

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					February 2012: the revised D&C EMP has been submitted to the Minister for approval. March 2012: The revised D&C EMP has been approved. Finding Closed	
SA01	20/07/11	N	SA01/01	D&C EMP, Utilities Area Archaeological and Cultural Heritage Sub Plan. Summaries from unapproved versions of CHMPs for both the Utilities Corridor and the Cranbourne Power Extension have been appended to the Sub Plan. This has resulted in inaccurate site identification and management information in the Sub Plan for the Utilities Corridor.	<p>TDJV response: The D&C EMP, Utilities Area Archaeological and Cultural Heritage Sub Plan will undergo a major revision to incorporate the recommendation of Executive Summaries of the approved versions of the CHMPs.</p> <p>September 2011: Actions are on-going.</p> <p>October 2011: Revised sub plan has been issued to DSE and IREA as part of overall revision, but did not include the CMHP extracts</p> <p>November 2011: AEM to follow up</p> <p>December 2011: CHMP Executive summary provided with the last version of the revised D&C EMP was still incorrect</p> <p>January 2012: The revised sub plan is yet to be provided to the IR&EA.</p> <p>February 2012: The revised Sub Plan has been provided to the IR&EA and included the correct summaries. The revised D&C EMP has been submitted to the Minister for approval.</p> <p>March 2012: The revised D&C EMP has been approved. Part D Notice received 22/3/12. Finding closed</p>	Finding Closed Audit No 137. March 2012
SA01	20/07/11	N	SA01/02	D&C EMP Utilities Area Archaeological and Cultural Heritage Sub Plan, and Performance Requirement #08070. Not all Aboriginal heritage sites identified in CHMPs for management were marked on Site Environmental Plans.	<p>TDJV response: The Site Environmental Plans (SEP) will be revised to include all sites that are not entirely within the construction easement as Heritage NO GO Zones.</p> <p>September 2011: Actions are on-going.</p> <p>October 2011: Actions are ongoing</p> <p>November 2011: Revised SEPs to be published in December</p> <p>December 2011: Not yet published, some minor revisions still to be incorporated.</p> <p>January 2012: Not yet published</p> <p>February 2012: The SEPs have been amended and published on Incite, and distributed to relevant project personnel. Sighted revised SEPs authorised by the Stakeholder and Completions Director. No Go zones have been revised and better defined. Sighted transmittal email from Incite Document Controller to engineers and site safety people. Part D Notice received and finding closed.</p>	Finding Closed Audit No 131 February 2012.

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
SA01	20/07/11	Afl	SA01/03	Utilities Corridor CHMP; D&C EMP Utilities Area; Archaeological and Cultural Heritage Sub Plan; Performance Requirements #08072. The Cultural Heritage Induction Booklet is not widely available to personnel across the utilities work area.	<p>TDJV response:</p> <p>The Cultural Heritage Induction Booklet will be distributed to general HSE information packs available to staff in crib huts. Pre-start talk topics will be distributed to inform crews of the availability of these booklets.</p> <p>September 2011: Actions are on-going.</p> <p>October 2011: Actions are ongoing and will focus on reinstatement crews.</p> <p>November 2011: Cultural Heritage inductions to be rolled out for reinstatement crews</p> <p>December 2011: Booklets being distributed to crib huts. Toolbox talks underway.</p> <p>January 2012: Booklets being distributed to crib huts. Toolbox talks underway. Finding Closed.</p>	Finding Closed Audit No 126, January 2012
111	4/10/11	N	111/01	D&C EMP, Utilities Area EMP. Construction verification and cleaning activities are being conducted, but these activities are not yet included in an approved revision to the Area EMP.	<p>TDJV response:</p> <p>The D&C Utilities EMP Risk Assessment and supporting documentation has been updated to include construction verification and cleaning activities and will be submitted to DSE Capital Projects for State consent.</p> <p>November 2011: Draft revised risk register sighted.</p> <p>December 2011: The revised D&C EMP has not yet been finalised for submission to the State and the IR&EA.</p> <p>January 2012: The revised D&C EMP has not yet been finalised for submission to the State and the IR&EA.</p> <p>February 2012: The revised D&C EMP has been submitted to the Minister for approval.</p> <p>March 2012: The revised D&C EMP has been approved. Part D Notice received 22/3/12. Finding closed</p>	Finding Closed Audit No 137, March 2012

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
111	4/10/11	N	111/02	D&C EMP Utilities Area, Transfer Pipeline Hydrostatic Test and Commissioning Phase, Environmental Discharge Procedure. An uncontrolled discharge from a leaking scour valve assembly connection to the Lang Lang River during pipe hydrotest had measured total residual chlorine at detectable levels. The procedure requires no detectable total residual chlorine in water discharged to the environment.	<p>TDJV response: The Hydrostatic Test and Commissioning Phase Environmental Discharge Procedure (PLV-3-EN-PR-0003-03) will be revised to remove reference to discharge having no detectable total residual chlorine. Based on expert advice, the acceptable residual chlorine level will be defined in accordance with State Environmental Protection Policy (Waters of Victoria) (SEPP (WoV)) and Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZECC & ARMCANZ, 2000).</p> <p>November 2011: PLJV have commissioned a technical note from a subject matter expert. The procedure is to be revised before the next hydrotest occurs.</p> <p>December 2011: Revised and approved procedure implemented for test section 4. Finding to be closed when the Part D Notice is received.</p> <p>January 2012: Part D Notice received by IR&EA. Finding Closed</p>	Finding Closed Audit No 126, January 2012
113	7/11/11	Afl	113/01	AquaSure EMS, 9.5.1 Internal audits. The six monthly internal EMS audit is two months overdue, and has not been conducted or scheduled.	<p>December 2011: The next internal audit is not yet scheduled</p> <p>January 2012: The internal audit is scheduled for the end of January. Finding Closed</p>	Finding Closed Audit No 123 January 2012
113	7/11/11	Afl	113/02	AquaSure EMS, 10.3.1 AquaSure continual improvement. There is no regular or systematic approach to capturing and disseminating best practice and lessons learnt from the Project.	<p>December 2011: An appropriate response to this is being considered by AquaSure</p> <p>January 2012: An effective mechanism for capturing issues is being developed.</p> <p>February 2012: No further progress.</p> <p>March 2012: No further progress.</p>	Remains open
114	14/11/11	Afl	114/01	D&C EMP, 9.3 Non-conformity, corrective and preventive action. The Quality Plan procedure referenced in the D&C EMP is not used to manage non-conformities. Corrective and preventive actions are not rated for priority, and no time lines are defined for actions to be implemented	<p>TDJV response:</p> <p>The TDJV Audit action registers will be updated to include allocations of priority and action timeframes for all non-conformities. Corrective and preventative actions are managed via the HSE Database – the EMP has been amended to reflect this. Actions are assigned via the HSE Database, which includes priority, time frames to complete and close outs. The HSE database issues actions to the assigned individual and tracks actions (including issuing reminders and warnings to all associated with the action).</p> <p>December 2011: No action</p> <p>January 2012: No action</p> <p>February 2012: Sighted priority ratings in TDJV action register. D&C EMP has been revised, but HSE database is not used to track actions. Finding Closed.</p>	Finding Closed Audit No 130, February 2012

AUDIT NO.	DATE	TYPE	FINDING NO.	FINDING	ACTION	STATUS
114	14/11/11	Afl	114/02	D&C EMP, 9.5.2 TDJV internal audits. The internal audit schedule is not based on environmental risks and the outcomes of previous audits, and does not adequately address the relevant stages of construction and associated activities.	TDJV response: The TDJV Internal Audit Schedule will be updated to include a program and environmental risk based approach along with actions and outcomes from previous audits December 2011: No action January 2012: No action February 2012: No action March 2012: A draft, unapproved audit schedule was provided after the audit. This finding closed and replaced with Finding No 135/02	Finding Closed Audit No 135, March 2012
114	14/11/11	Afl	114/03	D&C EMP, 10.3.1 Continual improvement. There is no regular or systematic approach to capturing and disseminating best practice and lessons learnt from the Project.	TDJV response: Environmental lessons learnt are circulated via the Thiess Business Unit (via the HSE Management System) and displayed around site when received by the Area Environmental Managers. Any lessons learnt relevant to the VDP project are communicated with the work group via the Environmental Toolbox Sessions. December 2011: No action January 2012: No action February 2012: The D&C EMP has been revised to define communication mechanisms. Finding Closed	Finding Closed Audit No 130, February 2012
120	8/12/11	Afl	120/01	D&C EMP, Plant and General Area Hazardous Materials sub plan. Jerry cans of diesel were observed during the site inspection at a number of locations around the site to unbunded and stored on unpaved areas	TDJV response: Hazardous material storage procedures were tool boxed to site personnel via the Desal Daily communication process. Individual area supervisors were reminded of their environmental obligations by the PGA Area Environmental Manager. Ongoing monitoring via Environmental Inspection Checklist. December 2011: No action January 2012: Some isolated examples of jerry can of fuel were observed. February 2012: Fuel storage was observed to be generally good. The site was tidy. Finding Closed.	Finding Closed Audit No 131, February 2012
127	17/01/12	Afl	127/01	D&C EMP 7.5.1 Access to current [legal and other] requirements. TDJV use the Thiess EnviroLaw legal update service, not Lawlex as defined in the D&C EMP. Standards Australia up dates are not used by TDJV.	TDJV response: The D&C EMP section 7.5.1 has been updated to reflect the current practices regarding environmental law updates and the revision was submitted for ministerial consent. February 2012: D&C EMP has been revised, and submitted to the Minister for approval. March 2012: The revised D&C EMP has been approved. Finding Closed	Finding Closed Audit No 135, March 2012

AUDIT NO.	DATE	TYPE	FINDING NO.	FINDING	ACTION	STATUS
127	17/01/12	Afl	127/02	D&C EMP, 7.5.3 Licence, permit and approval requirements. The HSE database has been updated with new permits, but the expiry dates have not been amended in the database	TDJV response: The database has been updated to show the correct expiration dates for the permits. February 2012: sighted. Finding Closed	Finding Closed Audit No 130, February 2012
131	7/03/12	N	131/01	D&C EMP Utilities Area EMP, Att L MIRA Schedule. Post construction monitoring of areas of known significant species has not been conducted in accordance with the timing requirements of the EPBC Listed Species Management Strategy. It is noted that PLJV has commenced discussions with SEWPAC to refine these monitoring requirements.	TDJV response (summarised): The EPBC Act Listed Species Management Strategy outlines post construction monitoring for EPBC Act listed threatened (endangered or vulnerable) species that were considered likely to be adversely affected by the construction and or operation of the Victorian Desalination Project. The post construction monitoring requirements have been summarised below.(...) Post construction monitoring for threatened freshwater fish will therefore commence as soon as practicable at the sites of known habitat. The commencement of post construction monitoring will include the following survey and assessment within the construction zone as well as at an up and down stream reference sites at each waterway including: •Assessment of habitat values; •Trapping over two days; •One session of dip netting, seine netting and electro fishing; •In situ water quality sampling (pH, conductivity, DO and turbidity). The timing of the surveys is to occur as follows: •First survey as soon as practical (within the next month). •Second survey to occur within the following month. •Quarterly thereafter. As this non-compliance applies to the conditions of the EPBC Act approval, the Department of Sustainability, Environment, Water, Population and Communities (SEWPAC) will be notified of the status of the monitoring. March 2012: SEWPAC has been verbally advised of the contravention of the monitoring requirements.	Remains open
134	9/03/12	Afl	134/01	AquaSure EMS. 8.2 Competence training and awareness. The EMR has not audited the implementation of training and awareness programs by the D&C contractor.		Remains open
135	7/03/12	Afl	135/01	D&C EMP Training, Attachment H. There is no definition of the requirement for 'General Environmental training' identified in Attachment H, and no records to demonstrate implementation of this training.	TDJV is yet to respond	Remains open
135	7/03/12	N	135/02	D&C EMP, 9.5.2 TDJV internal audits. There has been no satisfactory progress on developing and implementing an	TDJV response: TDJV recommenced the internal audit schedule on 15 March	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
				effective internal audit process.	<p>2012. The TDJV internal audits will focus on the D&C EMP document management, changed EMP requirements and high risk activities as defined in the area risk registers, current and pending significant environmental issues and as identified during the Environmental Managers (Ems) Meetings (refer section 9 of the Ems meeting minutes). Each quarterly audit schedule will be developed during the Ems meeting prior to the quarter commencing but The audits will be undertaken across each of the Plant and General, Utilities and Marine areas and will be conducted in conjunction with the AquaSure EMR audits where possible. The quarterly audit schedule will comprise a general audit of D&C EMP compliance and implementation and three subject/issue specific audits.</p> <p>The following table is a suggested schedule. It is anticipated that the topics will change as required, however, the timing of the schedule will remain in place.</p>	
136	8/03/12	Afl	136/01	D&C EMP, Plant and General Area. Hazardous Materials Sub Plan. At least six examples of containers of diesel and oils stored unbanded were observed around the site.	TDJV is yet to respond	Remains open
137	6/03/12	Afl	137/01	D&C EMP, Utilities Area, ASS Management Sub Plan. Post construction monitoring. Post construction groundwater monitoring in ASS areas is required three-monthly following completion of construction. This monitoring has not been scheduled or commissioned.	TDJV is yet to respond	Remains open
139	7/03/12	Afl	139/01	D&C EMP Marine Area. There has been no inspection of activities or review of environmental management for marine works since the pre-works checks.	TDJV is yet to respond	Remains open