

Victorian Desalination Project | Independent Reviewer & Environmental Auditor

## IR&EA REPORT

COMPLIANCE WITH ENVIRONMENTAL PERFORMANCE  
REQUIREMENTS QUARTER 3 2011

QUARTERLY REPORT TO THE MINISTER FOR ENVIRONMENT AND  
CLIMATE CHANGE

**October 2011**



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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 July - September 2011.

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, construction verification and cleaning activities. Site revegetation continued outside the construction footprint.
- **Utilities alignment:** pipe stringing and trenching, pipe and conduit laying, power cable installation and trench back-filling. Pipe hydrostatic testing commenced in September at the northern section of the pipe.

During the reporting period a total of 17 formal audit findings were raised, including five Non-compliances, ten Areas for Improvement and two Observations. In addition to the monthly audits conducted under clause 13.9 of the Project Deed, AquaSure requested a focused audit of compliance with the Project Cultural Heritage Management Plans (CHMPs). This audit resulted in two (of the overall five) Non-compliances and one Area for Improvement (of the total ten). A list of all the audit findings, as well as corrective and preventive actions to the end of September 2011 taken by AquaSure and TDJV to close the findings is given in Appendix 1.

The number of overall audit findings, and the number of Non-compliances increased during this reporting period over previous ones. In part this is due to the additional targeted audit of compliance with the Project CHMPs, which resulted in three findings. However, the number of findings from the routine monthly audits also increased.

The targeted audit of compliance with the CHMPs did not identify any material Non-compliances with the management requirements of the CHMPs. Two Non-Compliances with TDJV's internal management requirements were found, and a minor audit finding (Area for Improvement) relating to improvements in training and awareness on cultural heritage.

While on ground environmental management continues to effectively manage most issues, actual practice is diverging from the documented requirements, resulting in a number of documentation related audit findings. The D&C Environmental Management Plan (EMP) is currently being revised to include construction verification and cleaning activities, and to address a number of other required minor revisions, including the outcomes of audits. When the revised D&C EMP has been formally consented to by the State, the related audit findings, including several Non-compliances, can be closed.

The activities at the plant site are increasingly civil, mechanical and electrical works. These activities have a lower environmental risk profile, and the audit findings reflect this. Options for the long-term management of Acid Sulphate Soils (ASS) continue to

be the focus of on-going investigations by TDJV, which should be concluded in the first quarter of 2012.

Construction activity along the utilities alignment was almost complete during the reporting period, with only a few pipe segments still to be laid to the south of the alignment. Hydrostatic testing of the northern section commenced in September. The wet weather throughout much of the reporting period posed a challenge for effective sediment control along the alignment, and a Non-compliance was raised on sediment controls maintenance. Pipeline Joint Venture (PLJV) responded promptly and effectively to the Non-compliance and sediment controls were greatly improved. A Non-compliance was also raised in relation to the placement of surplus spoil near the Bass River which had encroached on an area of protected vegetation.

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 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 D&C EMP and the Area EMPs remained effective in guiding on-ground environmental management for most activities. Construction verification and cleaning activities are being conducted, and this documentation does not cover these activities. A Non-compliance was raised in relation to this issue, and remains open. While many audit findings relate to environmental management documentation and records, an increasing number were related directly to management of environmental risks. A Non-compliance on inadequate waste management data has remained open for some time.

The IR&EA was requested by AquaSure to conduct an audit of compliance with the requirements of all CHMPs for the Project. This request followed advice from PLJV that an area near the Cranbourne Terminal Station was not fenced off as required by the CHMP for the Cranbourne Extension. The audit did not identify any material non-compliances with the requirements of the CHMPs, but several audit findings were raised in relation to TDJV's internal processes.

### **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. The findings of the audit of compliance with CHMPs may impact the related Performance Requirements.

## 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 operational and maintenance stage similarly will operate under specific EMPs. In addition a range of environmental requirements has 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 July - September 2011.

## 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 EES (Technical Appendix 2).

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 14001:2004<sup>1</sup>. 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. The EMPs 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.

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.

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

## 2.4 IR&EA environmental audits

During the D&C Phase, the IR&EA is 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 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 July - September 2011. 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 19011:2002<sup>2</sup>. 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
- Design-related Environmental Performance Requirements, conformance with which is assessed through audits of AquaSure/TDJV's internal processes for

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

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 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.

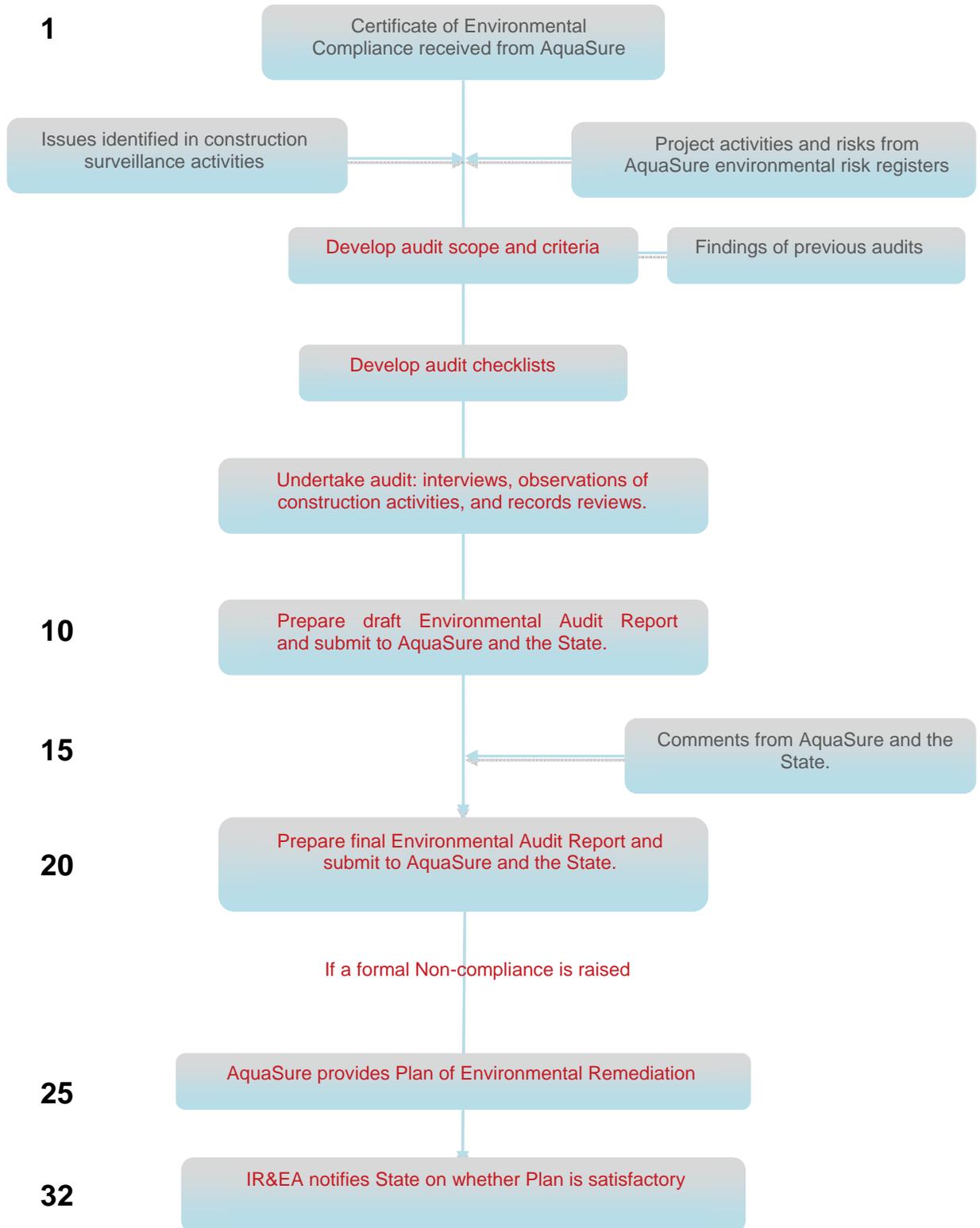
**Note:** A non-compliance may be an individual non-compliance or a number of minor but related audit non-conformances, which when considered in total are judged to constitute a non-compliance.

**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**

**Business days  
from start of month**



## 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, construction cleaning and verification activities. Site revegetation continued outside the construction footprint.
- **Utilities alignment:** pipe stringing and trenching, pipe and conduit laying, power cable installation and trench back-filling. Pipe hydrostatic testing commenced in September at the northern section of the pipe.

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

**Figure 2. RO building, Plant Site September 2011**



**Figure 3. Utilities alignment, August 2011**



## 4.2 Environmental audits

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

Audit No	Date	Scope
93	8/7/2011	Office audit of implementation of the Environmental Management Representative's (EMR's) responsibilities and relevant requirements of the Project Deed
94	8/7/2011	Office audit of documentation and records related to requirements of the D&C EMP
95	11/7/2011	Field audit of implementation of key requirements and sub-plans of the D&C Plant and General Area EMP
96	7/7/2011	Field audit of implementation of key requirements and sub-plans of the D&C Utilities Area EMP
97	8/7/2011	Office audit of the implementation of the Baseline Marine Monitoring Program
98	5/8/2011	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
99	5/8/2011	Office audit of documentation and records related to requirements of the D&C EMP
100	2/8/2011	Field audit of implementation of key requirements and sub-plans of the D&C Plant and General Area EMP
101	9/8/2011	Field audit of implementation of key requirements and sub-plans of the D&C Utilities Area EMP
102	5/8/2011	Office audit of the implementation of the Baseline Marine Monitoring Program
103	12/9/2011	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
104	12/9/2011	Office audit of documentation and records related to requirements of the D&C EMP
105	8/9/2011	Field audit of implementation of key requirements and sub-plans of the D&C Plant and General Area EMP
106	6/9/2011	Field audit of implementation of key requirements and sub-plans of the D&C Utilities Area EMP
107	9/9/2011	Office audit of the implementation of the Baseline Marine Monitoring Program

## 5 AUDIT FINDINGS AND CONCLUSIONS

### 5.1 Audit findings

During the reporting period a total of 17 formal audit findings were raised, including five Non-compliances, ten Areas for Improvement and two Observations. In addition to the monthly audits conducted under clause 13.9 of the Project Deed, AquaSure requested a focused audit of compliance with the Project Cultural Heritage Management Plans (CHMPs). This audit resulted in two (of the overall five) Non-compliances and one Area for Improvement (of the total ten). A list of all the audit findings, as well as corrective and preventive actions to the end of September 2011 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.

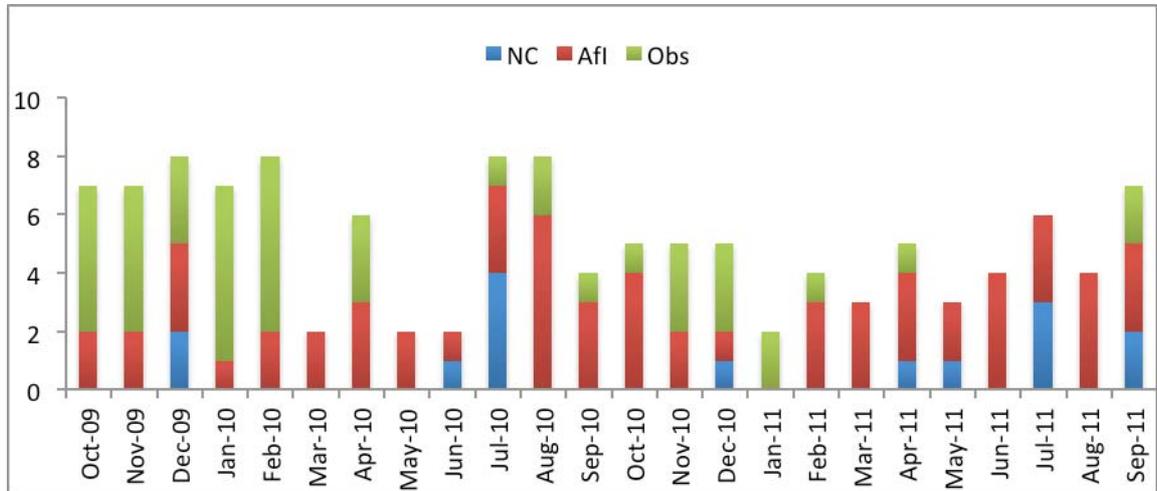
**Table 1. Summary of environmental audit findings Q3 2011**

<b>Audit finding type</b>	<b>No. Open at July '11</b>	<b>No. Raised July - Sept '11</b>	<b>No. Closed July - Sept '11</b>
Non Compliance	2	5	2
Area for Improvement	6	10	9
Observation	6	2	1
<b>Totals</b>	<b>14</b>	<b>17</b>	<b>12</b>

The number of overall audit findings, and the number of Non-compliances increased during this reporting period over previous ones. In part this is due to the additional targeted audit of compliance with the Project CHMPs, which resulted in three findings. However, the number of findings from the routine monthly audits also increased.

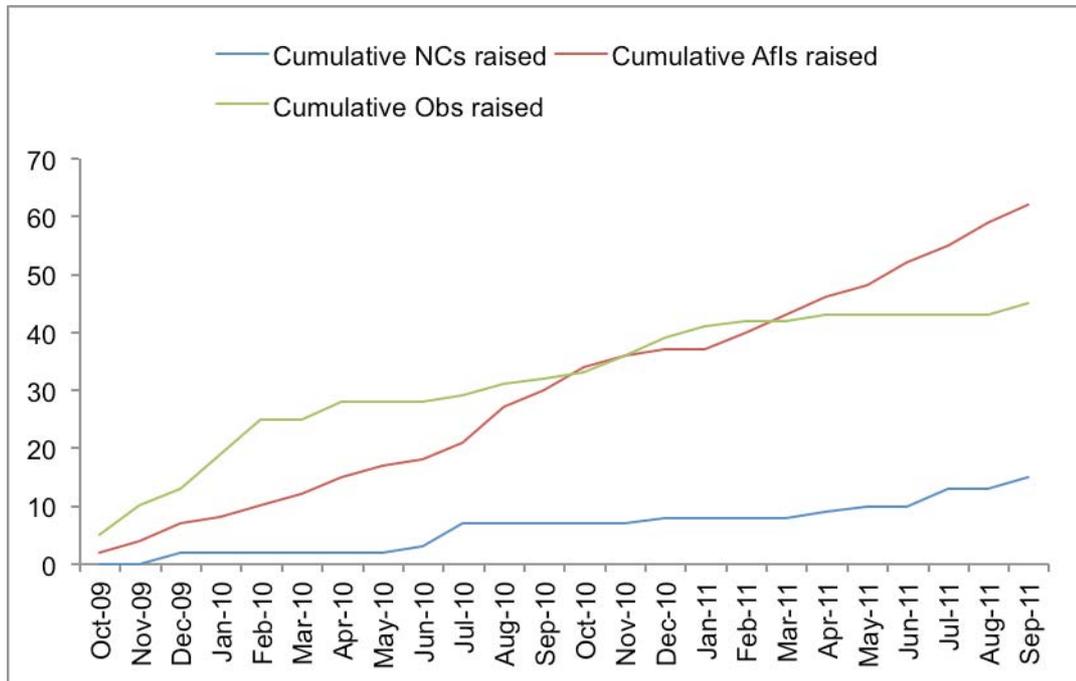
The number of each type of audit finding raised each month since project inception is given in Figure 4 below.

**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.**



The activities at the plant site are increasingly civil, mechanical and electrical works. These activities have a lower environmental risk profile, and the audit findings reflect this. Options for the long-term management of Acid Sulphate Soils (ASS) continue to be the focus of on-going investigations by TDJV, which should be concluded in the first quarter of 2012. During the reporting period environmental management activities at the

plant site included ASS treatment (see Figure 6), as well as management of a range of routine issues such as dust suppression (see Figure 7).

**Figure 6. Acid sulphate soils treatment, September 2011**



**Figure 7. Dust suppression, Plant site, September 2011**



Construction activity along the utilities alignment was almost complete during the reporting period, with only a few pipe segments still to be laid to the south of the alignment. Hydrostatic testing of the northern section commenced in September. The wet weather throughout much of the reporting period posed a challenge for effective sediment control along the alignment, and a Non-compliance was raised on sediment controls maintenance. PLJV responded promptly and effectively to the Non-compliance and sediment controls were greatly improved. A Non-compliance was also raised in relation to the placement of surplus spoil near the Bass River which had encroached on an area of protected vegetation.

Figure 8. Biosecurity washdown instructions, Utilities alignment September 2011.



Figure 9. Heritage site protection, Utilities alignment, August 2011



## 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 EMS provides the overall framework for environmental management for the project. 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 D&C EMP and the Area EMPs remained effective in guiding on-ground environmental management for most issues. Construction verification and cleaning activities are being conducted, and this documentation does not cover these activities. A Non-compliance was raised in relation to this issue, and remains open. While many audit findings relate to environmental management documentation and records, an increasing number were related directly to management of environmental risks. A Non-compliance on inadequate waste management data has remained open for some time.

The IR&EA was requested by AquaSure to conduct an audit of compliance with the requirements of all CHMPs for the Project. This request followed advice from PLJV that an area near the Cranbourne Terminal Station was not fenced off as required by the CHMP for the Cranbourne Extension. The audit did not identify any material Non-compliances with the requirements of the CHMPs, but several audit findings were raised in relation to TDJV's internal processes.

### **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. The findings of the audit of compliance with CHMPs may impact the related Performance Requirements.

## Appendix 1. Environmental audit findings Q3 2011

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	OBS	2/04	<p>The roles and responsibilities of the Environmental Management Representative as defined in Appendix S3, Clause 2 of the Project Scope and Performance Requirements (PS&amp;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 &amp; s4.4.3, and the AquaSure Community Involvement Plan (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"> <li>• Draft protocol for communication with external agencies</li> <li>• Draft protocol for communication with stakeholders on environment issues and complaints</li> <li>• Draft revised CIP; including definition of EMR roles and responsibilities</li> </ul> <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 (EAG).</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>	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					<p>February 2011: DSE has some minor comments still outstanding.</p> <p>March 2011: The revised draft of the CIP adequately addresses 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 is still to be submitted for State consent.</p> <p>August 2011: The CIP is still to be submitted for State consent.</p> <p>September 2011: The CIP is still to be submitted for State consent.</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>	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
54	4-Nov-2010	Obs	54/01	<b>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.</b>	<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>September 2011: The revised EMS is still to be submitted for State consent</p>	Remains open
54	4-Nov-2010	Obs	54/02	<b>AquaSure EMS Manual. 9.2 Non-conformity, corrective and preventative actions.</b> 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: AquaSure Non-Compliance 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</p>	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					consent September 2011: The revised EMS is still to be submitted for State consent	
80	6/04/11	Afl	80/01	<b>D&amp;C EMP Plant and General Area. Risk register.</b> Construction verification and cleaning activities have commenced on site, 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 commenced.	May 2011: The Plant and General Area risk assessment is being reviewed to identify any additional control measures. June 2011: Pre-commissioning documentation is still being developed (and a draft was provided to the IR&EA for review after the audit). Construction verification activities continue, managed through permit system. Desal Daily notification of hydro testing in RO building sighted dated 8 June. July 2011: Preliminary draft documentation was provided to the State and the IR&EA. A revised draft had not been prepared at the time of the audit. <b>This finding is closed and replaced with Finding No 95/01</b>	Finding Closed Audit No 95, July 2011
81	7/04/11	N	81/01	<b>D&amp;C EMP Utilities Area Monitoring Inspection Reporting and Auditing Schedule.</b> Monitoring has not included sampling of high or medium flow waterways within 12 hours of a substantial rainfall event.	TDJV response: The laboratory water quality monitoring within 12hr of substantial rainfall will be removed from the D&C Utilities Area EMP Attachment L – Monitoring, Inspection, reporting and Audit Schedule. Laboratory sampling of medium and high flow waterways prior, during and post construction activities will continue to ensure that any potential changes to the water quality parameters assessed by laboratory monitoring are detected and if required, rectification works can be completed. The sampling has not been undertaken because due to the time taken to return sample results from laboratory water quality sampling, it is non-informative to the management of the site in time frame of a response to a substantial rainfall event. Continuous turbidity monitoring completed in high and medium waterways provides a more effective indicator of changes in water quality in response to substantial rainfall. May 2011: The response is noted and accepted, particularly as construction on waterways is almost complete. This finding to be closed when a Part D Notice is received. June 2011: No further action. July 2011: Part D Notice received on 29 June 2011. Finding Closed.	Finding Closed Audit No 96, July 2011
81	7/04/11	O	81/02	<b>D&amp;C EMP, Utilities Area. 9.1.2 Environmental inspections.</b> The Site Environmental Inspection Reports (SEIR) include identification of required rectification actions. There is no formal recording of close out of these actions.	TDJV response: A review of the actions in the outstanding SEIR will be undertaken to ensure that all actions have been closed out. May 2011: Review commenced, but not yet completed. June 2011: Sighted a number of SEIRs, many actions are now	Finding Closed Audit No 101, August 2011

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					being closed out, but review is on going. July 2011: the review is still underway. August 2011: Site inspection actions close out. The action register now is complete, and the register is being maintained. Signed print out of the register. Finding Closed.	
83	9/05/11	Afl	83/01	<b>AquaSure EMS. 9.5.1 AquaSure audits.</b> The EMR conducts monthly audits, but these are not targeted to high risk activities as required by the EMS.	June 2011: EMR is to coordinate audits with TDJV Environmental Manager. July 2011: The forward audit program is minuted in EWG meeting minutes. This program now covers high risk areas. Finding closed.	Finding Closed Audit No 93, July 2011
84	11/05/11	N	84/01	<b>D&amp;C EMP Resource Efficiency Sub Plans. Waste Management Report 2010.</b> 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.	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. 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.	Remains open
88	10/06/11	Afl	88/01	<b>AquaSure EMS, 8.3.1 Communication.</b> While the EMR demonstrated relevant interaction with key stakeholders particularly government regulators, there is not regularly scheduled meetings with DSE and EPA outside the broader Environmental Agency Meetings.	July 2011: Regular meetings with EPA have been reinstated. Finding closed.	Finding Closed Audit No 93, July 2011
90	8/06/11	Afl	90/01	<b>D&amp;C EMP Plant and General Area, Hazardous materials sub plan.</b> Small quantities of fuel and chemicals were observed around the site to be stored unbundled	July 2011: Advice on chemical storage was included in a Desal Daily, and the Area Environment Manager (AEM) has briefed supervisors. On-going inspections are being conducted. Many examples of poor storage of small quantities of chemicals were observed during the site inspection for this audit. August 2011: while housekeeping is considerably improved, a number if examples of poor storage of small amounts of chemicals was still observed, particularly at the back of the lime building.	Finding Closed Audit No 105, September 2011.

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
					September 2011: Site housekeeping was significantly improved, including storage of chemicals. Finding Closed.	
90	8/06/11	Afl	90/02	<b>D&amp;C EMP Plant and General Area Noise and Vibration sub plan.</b> The sub plan does not systematically reflect the noise management undertaken at the plant site, including the planning and scheduling of potentially noisy activities.	July 2011: The revisions are in draft form August 2011: The revisions are in draft. September 2011: The revisions are in draft.	Remains open
91	9/06/11	Afl	91/01	<b>D&amp;C EMP Utilities Area Waterways and wetlands sub plan.</b> The sediment controls at the waterway crossing at Wenn Road did not adequately protect disturbed areas	July 2011: Sediment controls at Wenn Road had been installed, but required maintenance in some areas. August 2011: The reinstatement at Wenn Road is complete. This was inspected and sediment controls are appropriate. Finding Closed	Finding Closed Audit No 101 August 2011
95	11/07/11	N	95/01	<b>D&amp;C EMP Plant and General Area. Risk Register.</b> 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.	TDJV response: 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 Commissioning Environmental Sub Plan. Once complete this will be submitted to state for approval. All onsite activities have been included in the revised Risk Assessment which is being implemented on site but has not yet been signed off by the State. August 2011: The risk register is being revised as part of an overall revision of the D&C EMP September 2011: The risk register is being revised as part of an overall revision of the D&C EMP	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
95	11/07/11	Afl	95/02	<b>D&amp;C EMP, Plant and General Area Water Quality and Erosion management sub plan.</b> Drainage from Access Road 3, including drainage from the back of the Treated Water Storage Pad, flows along a drain next to the road and to a blind swale on the north side. Sediment and erosion controls needs to be better managed and the swale regularly cleaned out.	<p>TDJV response:</p> <p>This had been previous noted in site inspection records; however current weather and ground conditions do not allow any machinery access to the area. As it is a blind swale and the catchment leading to this is very small there is no immediate risk to the off site environment because of the sediment build up. This work are is also not yet finished in its final configuration and will need further work as soon as access is possible. The area will continue to be monitored by the environmental team until such works are completed. The wetland area provides a further buffer zone below this area further mitigating any potential risks.</p> <p>August 2011: Site drainage is being reconfigured, and the AEM advised the drain and the swale will be de-silted when conditions allow.</p> <p>September 2011: landscaping works have commenced along Access Road 3., including the swales. Finding Closed.</p>	Finding Closed Audit No 105, September 2011
96	7/07/11	Afl	96/01	<b>D&amp;C EMP Utilities Area. Incident reporting.</b> The placement of surplus spoil on sensitive vegetation at the Bass River had not been identified as an incident, and accordingly the required notifications had not occurred. It is noted that since the time of the audit this event has been appropriately notified as a Class 2 incident.	<p>TDJV response:</p> <p>This incident has been reported as a Class 2 Incident (HSE Database Incident No 150866).</p> <p>August 2011: The incident report has been forwarded to the IR&amp;EA. Finding Closed.</p>	Finding Closed Audit No 101 August 2011
96	7/07/11	N	96/02	<b>D&amp;C EMP Utilities Area Flora and Fauna sub plan.</b> Surplus spoil has been placed near the Bass River and has encroached on an area of sensitive vegetation.	<p>TDJV response:An inspection of the stockpile was completed with the General Site Superintendent to devise a temporary remediation plan.Due to site constraints full removal of the stockpile was not possible immediately. As such the stockpile was levelled off to allow a long arm excavator was groom the batter faces and retrieve the spoil that had slumped off the stockpile pad. Sediment fences have been reinstated around the entire stockpile. Full removal of the stockpile will be a reinstatement priority as soon as construction activities in between the Bass River and Stewarts Rd have been completed.</p> <p>August 2011: The stockpile has been stabilised and groomed, The AEM advises that the spoil will be removed once the pipe works have been completed. This finding to remain open until the area is rehabilitated.</p> <p>September 2011: The stockpile is being removed. The finding will be closed when removal is confirmed.</p>	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
96	7/07/11	Afl	96/03	<b>D&amp;C EMP Utilities Area Waterways and Wetlands sub plan.</b> PLJV internal permits for discharge from the Right of Way to the Bass River were issued in January, February, May and June for a specified time period, but there is no current internal permit for discharge.	<p>TDJV response:</p> <p>The discharge from the Right of Way (RoW) to the Bass River was reviewed. Given the need to rapidly dewater in the area, a water filtration unit was used to dewater the RoW for which a discharge permit was issued (permit number 598) and relevant notification made.</p> <p>August 2011: The Bass River northern works area was inspected. No dewatering was required. Finding Closed.</p>	Finding Closed Audit No 101 August 2011
96	7/07/11	N	96/04	<b>D&amp;C EMP Utilities Area Waterways and Wetlands sub plan.</b> Sediment controls in a number of areas along the alignment have been observed to require maintenance for several months.	<p>TDJV response:</p> <p>Works required to address this NCR will be coordinated to prioritise high risk areas. This will be done in the following manner:</p> <ol style="list-style-type: none"> <li>1. Sensitive Waterways - A review of all high and medium flow waterways (including all Performance Requirement (PR) Sensitive waterways) will be completed by the Environmental Team to direct works to ensure these sensitive areas are in a stable condition through to reinstatement (next 4 – 9 months).</li> <li>2. Medium Waterways – A typical medium waterway reinstatement plan has been provided to the reinstatement crew to direct the typical works required in the medium waterways.</li> <li>3. Minor waterway and remaining areas – The remaining areas of the RoW have been broken down into ~10km sections in which the remaining erosion and sediment control works will be addressed.</li> </ol> <p>August 2011: Sediment control works: high risk waterways, about 60% of installation done. The forward works plan was sighted. Some work on medium risk waterways has also been done. Finding to remain open until all high risk areas (at least) have been protected.</p> <p>September 2011: Works on high flow waterways areas are done, and most medium flow waterways. Finding closed and Part D Notice received from TDJV.</p>	Finding Closed Audit No 106 September 2011.
98	5/08/11	Afl	98/01	<b>AquaSure EMS, document review and approval.</b> 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>	Remains open
99	5/08/11	Afl	99/01	<b>D&amp;C EMP, 8.5 Operational Management control.</b> 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:</p> <p>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>	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
99	5/08/11	Afl	99/02	<b>D&amp;C EMP 8.5 Operational Management control.</b> 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.	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. September 2011: to be included in next revision of D&C EMP.	Remains open
100	2/08/11	Afl	100/01	<b>D&amp;C EMP, Plant and General Area, Air Quality Sub Plan.</b> The real time weather and dust monitoring station has been off-line for several months, and accordingly only hand held dust monitors are available for spot checks. Dust may be an issue as the site dries out, and real time monitoring will be required.	TDJV response: Dust monitoring has been reinstalled with added security and recommenced operation on 29/08/11. September 2011: Dust monitoring data sighted. Finding Closed.	Finding Closed, Audit No 105, September 2011.
SA01	20/07/11	N	SA01/01	<b>D&amp;C EMP, Utilities Area Archaeological and Cultural Heritage Sub Plan.</b> 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.	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. September 2011: Actions are on-going.	Remains open
SA01	20/07/11	N	SA01/02	<b>D&amp;C EMP Utilities Area Archaeological and Cultural Heritage Sub Plan, and Performance Requirement #08070.</b> Not all Aboriginal heritage sites identified in CHMPs for management were marked on Site Environmental Plans.	TDJV response: The Site Environmental Plans will be revised to include all sites that are not entirely within the construction easement as Heritage NO GO Zones. September 2011: Actions are on-going.	Remains open
SA01	20/07/11	Afl	SA01/03	<b>Utilities Corridor CHMP; D&amp;C EMP Utilities Area; Archaeological and Cultural Heritage Sub Plan; Performance Requirements #08072.</b> The Cultural Heritage Induction Booklet is not widely available to personnel across the utilities work area.	TDJV response: 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. September 2011: Actions are on-going.	Remains open
103	12/09/11	Afl	103/01	<b>AquaSure EMS. 7.5 Legal and other requirements.</b> Compliance with the requirements of the Coastal Management Act consent for the project is not tracked.	October 2011: The EMR is auditing TDJV compliance with the Coastal Management Act (CMA) consent in October.	Remains open

AUDIT NO.	DATE	TYPE.	FINDING NO.	FINDING	ACTION	STATUS
104	12/09/11	Afl	104/01	<b>D&amp;C EMP, 7.5.3 Licence, permit and approval requirements.</b> There is no systematic process for the tracking of the status of licences, permits and approvals, including compliance status and whether the approval is current. Compliance with approvals is not included in the TDJV internal audit schedule.	TDJV response: TDJV will undertake a review of all Project licence, permit and approvals including compliance and currency status. Compliance with approvals has been added to the TDJV Internal Audit Schedule. October 2011: The compliance review has been commenced.	Remains open
105	8/09/11	O	105/01	<b>D&amp;C EMP Plant and General Area Noise and Vibration Sub Plan.</b> TDJV has responded to a series of complaints on night-time noise from a neighbour on West Area Road over several months. The responses have included conducting noise monitoring and implementing noise mitigation measures. TDJV's responses have followed the requirements of the Community Involvement Plan, however the complainant still maintains that a disturbing noise can be heard inside his house at night. The complainant has declined noise monitoring inside the house. While the response of TDJV is considered appropriate, the potential that night noise levels may not meet the requirements of EPA Publication 1254 cannot be excluded.	TDJV response: TDJV have made changes to site operations and confirmed via monitoring (external at property boundary) that this has resulted in a measureable [sic] reduction in noise. TDJV continues to liaise with the nearby resident via the community team. The complainant is still refusing attended listening. TDJV actions have been in accordance with the EMP (including Publication 1254) and the CIP. As the resident is refusing attended noise monitoring which has been offered by TDJV no further action is proposed. TDJV will continue to liaise with the local resident via the CIP as required. October 2011: Actions noted. Finding closed.	Finding Closed Audit No 110, October 2011
106	6/09/11	O	106/01	<b>D&amp;C EMP Utilities Area. Licences approvals and permits.</b> Several permits issued by Melbourne Water for Works on Waterways are not current. It is noted that PLJV have commenced discussions with Melbourne Water Corporation (MWC) to obtain or renew the relevant permits.	TDJV response: All expired Melbourne Water Corporation Permits that have expired were surrendered on the 29.9.2011. New permits were issued for Rectification Works on Type A & B waterways (A111593) and Scour Valves (A111592). In conjunction with the Permit to Work on Type C Waterways (A87950), all remaining works on waterways are covered by an active permit. October 2011: Meeting held with MWC. All expired permits surrounded. Signed acknowledgment from MWC sighted. Two new permits issued. One covering reinstatement works on types A and B waterway valid to end June 2012. One for scour valves. Finding closed.	Finding Closed Audit No 111, October 2011