



SANDY RIDGE

Compliance Report No. 1

EPBC 2015/7478

Prepared for
Australian Government
Department of Agriculture, Water and
Environment

Tellus Holdings Ltd

August 2020

Prepared by

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ABBREVIATIONS

Cth	Commonwealth
DAWE	Department of Agriculture, Water and the Environment
DoEE	Department of the Environment and Energy <i>now DAWE</i>
DGMMP	Deep Groundwater Monitoring and Management Plan
DWER	Department of Water and Environmental Regulation
EPBC Act	<i>Environmental Protection and Biodiversity Conservation Act 1999</i>
EPBC 2015/7478	EPBC Approval dated 7 January 2019
EP Act	<i>Environmental Protection Act 1986</i>
GMB	Groundwater Monitoring Bore
GME	Groundwater Monitoring Event
IBC	Intermediate Bulk Container
km	Kilometres
LOR	Limit of Reporting
LMMP	Leachate Monitoring and Management Plan
LLW	Low-Level Radioactive Waste
mbgl	Metres below ground level
Mining Act	<i>Mining Act 1978</i>
MS 1078	Ministerial Statement 1078
NEPM	National Environment Protection Measure
NORM	Naturally-Occurring Radioactive Material
RS Act	<i>Radiation Safety Act 1975</i>
Tellus	Tellus Holdings Limited
the Company	Tellus Holdings Limited
the Department	Department of Agriculture, Water and the Environment
the Facility	The Sandy Ridge Facility
tpa	Tonnes per annum
WA	Western Australia

DECLARATION OF ACCURACY

Project Name	Sandy Ridge Facility
Approval Holder	Tellus Holdings Limited
EPBC Reference	2015/7478
Approved Action	Construct and operate an open-cut kaolin clay mine, arid near surface geological waste repository with the mine voids, and associated infrastructure for the storage, treatment, recovery and permanent isolation (disposal) of hazardous and intractable waste (including low level radioactive wastes), approximately 75 km north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia [As described in EPBC referral 2015/7478 subject to the variations of the action accepted by the Minister under section 156B on Friday, 22 December 2017 and Friday, 9 November 2018].
Reporting Period	7 July 2019 to 6 July 2020
<p>Declaration of Accuracy</p> <p>In making this declaration, I am aware that sections 490 and 491 of the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.</p>	
Signature of Authorised Reporting Officer	
Name of Authorised Reporting Officer	Michael Ingram
Position of Authorised Reporting Officer	Chief Operating Officer
Organisation Name	Tellus Holdings Limited
Organisation ACN	138 119 829
Organisation ABN	97 138 119 829

EXECUTIVE SUMMARY

In accordance with the requirements of Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) the Australian Government granted approval to Tellus Holdings Ltd (Tellus) to construct and operate an open-cut kaolin clay mine, arid near-surface geological waste repository within the mine voids, and associated infrastructure on 7 January 2019. The approval (ref: EPBC 2015/7478) allows for the treatment, recovery and permanent isolation (disposal) of hazardous and intractable wastes (including low level radioactive wastes). The Sandy Ridge Facility (the Facility), is located approximately 75 kilometres north-east of Koolyanobbing in the Shire of Coolgardie, Western Australia.

This report has been prepared in accordance with Part B, Condition 9 of EPBC 2015/7478 that requires a Compliance Report to be prepared for each 12-month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. This is the first Compliance Report to be submitted against the requirements of EPBC 2015/7478 and has been prepared in accordance with the requirements of the *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014). The reporting period for this Compliance Report has been defined as from 7 July 2019 (date of commencement of the action) to 6 July 2020 (12 months from date of commencement of the action).

During the reporting period the Facility was under construction. The first waste was accepted into approved temporary waste storage on 6 July 2020, the last day of this reporting period. Commissioning of Facility infrastructure and handover from the Principal Contractor to Tellus is scheduled to occur during the period of August to September 2020. Operational activities under the control of Tellus are scheduled to commence in late September 2020.

Tellus’s overall compliance status with EPBC 2015/7478 for the reporting period is summarised in Table ES-1.

Table ES-1 – Overall compliance status with EPBC 2015/7478

Number of Conditions Compliant	Number of Conditions Non-compliant	Number of Conditions Not Applicable
7	1	7

Tellus identified one non-compliant condition with EPBC 2015/7478 during the reporting period. The non-compliance was associated with the requirements of Part A, Condition 1 of EPBC 2015/7478 which requires that Tellus must comply with Conditions 1 and 9 of the Western Australia Government Ministerial Approval 1078.

The non-compliance concerned the unauthorised clearing of an area of 43 square metres (m²) of vegetation outside of the approved development envelope. Tellus provided details of the unauthorised clearing to the Department of Agriculture, Water and the Environment (DAWE, formerly the Department of the Environment and Energy (DoEE)) on 19 August 2019 [04a] noting that the non-compliance did not involve matters of national environmental significance as listed under the *EPBC Act* and associated Regulations.

DAWE responded to Tellus on 2 September 2019 acknowledging that the Western Australian (WA) Department of Water and Environmental Regulation (DWER) had been advised of the non-compliance. No further communication was received from DAWE concerning the non-compliance. DWER formally notified Tellus that a non-compliance with Condition 1 of MS 1078 had occurred in a letter dated 16 September 2019. DWER noted that it had reviewed the corrective actions implemented by Tellus to address the non-compliance and considered the issue as being satisfactorily managed. Tellus also notified the WA Department of Mines, Industry Safety and Regulation concerning the non-compliance.

During the reporting period Tellus identified that it was compliant with Condition 9 of Ministerial Approval 1078.

Part A, Condition 2 of EPBC 2015/7478 requires Tellus to develop and implement a Deep Groundwater Monitoring and Management Plan (DGMMP). Given the DGMMP was approved by DAWE on 29 May 2020, full implementation of the plan was not assessed for the reporting period. It is noted that Tellus did conduct groundwater monitoring events during the reporting period as required by the DGMMP. Data interpretation and initial generation of site-based trigger and threshold criteria for shallow groundwater monitoring is scheduled to occur in September 2020. In-ground emplacement of waste is scheduled to occur at the Facility in December 2020. Monitoring of deep groundwater wells as required by the DGMMP is scheduled to follow in-ground emplacement of waste.

A summary of the status of all conditions of EPBC 2015/7478 is outlined within the Compliance Assessment Audit Table (Table A-1) presented in **Appendix A**.

1 INTRODUCTION

This Compliance Report has been prepared to document compliance with the Australian Government’s Department of Agriculture, Water and the Environment (DAWE or the Department) approval EPBC 2015/7478 issued in accordance with Part 9 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The approval allows Tellus Holdings Limited (Tellus or the Company) to construct and operate a dual open cut kaolin clay mine and arid near-surface geological waste repository known as the Sandy Ridge Facility (the Facility).

The Facility is licenced to accept Class IV and Class V waste and is located approximately 75 kilometres (km) north east of Koolyanobbing, Western Australia (WA).

1.1 Background

In 2015 Tellus submitted a referral to the WA government construct and operate an open-cut kaolin (clay) mine and complementary near-surface geological waste repository, accepting Class IV (Secure Landfill) and Class V (Intractable Landfill) waste, including waste from interstate, Australia’s Exclusive Economic Zone.

The Facility was granted WA government Ministerial Approval on 26 June 2018 (Ministerial Statement 1078).

Tellus has approval to mine kaolin under the *Mining Act 1978* (Mining Act) and store hazardous and intractable chemical and low-level radioactive waste materials under the *Environmental Protection Act 1986* (EP Act). The Facility has an existing site Registration for the temporary storage of Low-Level Radioactive Waste (LLW). This was granted in October 2019 under the WA *Radiation Safety Act 1975* (RS Act). It currently seeks an amendment to the site Registration to permanently isolate LLW under the RS Act.

Up to 290,000 tonnes per annum (tpa) of kaolin clay will be mined and the mining voids will be used for the permanent isolation of wastes, including hazardous and intractable wastes, and LLW. The Facility will receive up to 100,000 tpa of Class IV and Class V waste for approximately 25 years. Once commissioned the Facility consists of:

- Mine infrastructure, including stockpile area, storage building, laboratory, mining offices and laydown yard.
- Waste infrastructure including an inflatable dome waste cell cover, container hardstand, waste inspection area, waste immobilisation plant, radioactive waste warehouse and package building, and waste laboratory.
- Other infrastructure including an accommodation camp, access roads, water pipelines, and a putrescible landfill. The putrescible landfill services the accommodation camp and office. Only wastes generated at the Facility will be disposed in this landfill.

A Regional Location plan is presented as [Figure 1-1](#) at the end of this Section.

1.2 Purpose and scope

This Compliance Report is submitted in accordance with the requirements set out in Part B, Condition 9 of EPBC 2015/7478, which requires the following:

Condition 9 – Annual compliance reporting

The approval holder must prepare a compliance report for each 12 month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval must:

- a) Publish each compliance report on the website with 60 business days following the relevant 12 month period;*
- b) Notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;*
- c) Keep all compliance reports publicly available on the website until this approval expires;*
- d) Exclude or redact sensitive ecological data from compliance reports published on the website; and*
- e) Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department with 5 business days of publication.*

The reporting period for this Compliance Report has been defined as from 7 July 2019 (date of commencement of the action) to 6 July 2020 (12 months from date of commencement of the action) and is based on Tellus' assessment of compliance with the conditions of EPBC 2015/7478.

1.3 Report methodology

This Compliance Report has been prepared in accordance with the requirements of the *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014).

1.4 Retention of compliance reports

Tellus will retain Compliance Reports for the life of the approval in accordance with Part B, Condition 9-c of EPBC 2015/7478 and will continue to implement the proposal until the Minister has determined all conditions have been satisfactorily addressed.

1.5 Public availability of reports

Tellus will make this Compliance Report publicly available in accordance with Part B, Conditions 9-a and 9-c of EPBC 2015/7478.

In accordance with Part B, Condition 9-d of EPBC 2015/7478 Tellus will exclude or redact any sensitive ecological data from Compliance Reports published on the website. Where sensitive ecological data has been excluded or redacted, Tellus will, in accordance with Part B, Condition 9-e of EPBC 2015/7478 submit the full report to the Department within five business days of publication.

No sensitive ecological data has been excluded or redacted from this Compliance Report.

1.6 New environmental risks

No new environmental risks were identified during the reporting period.

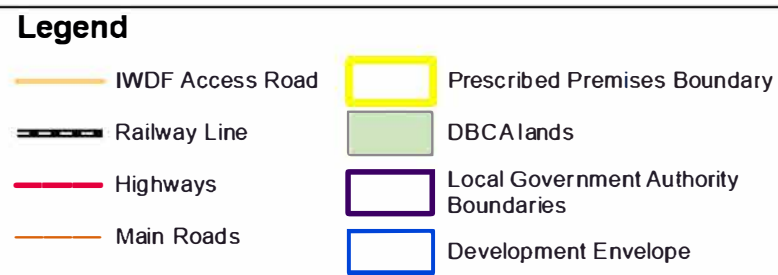
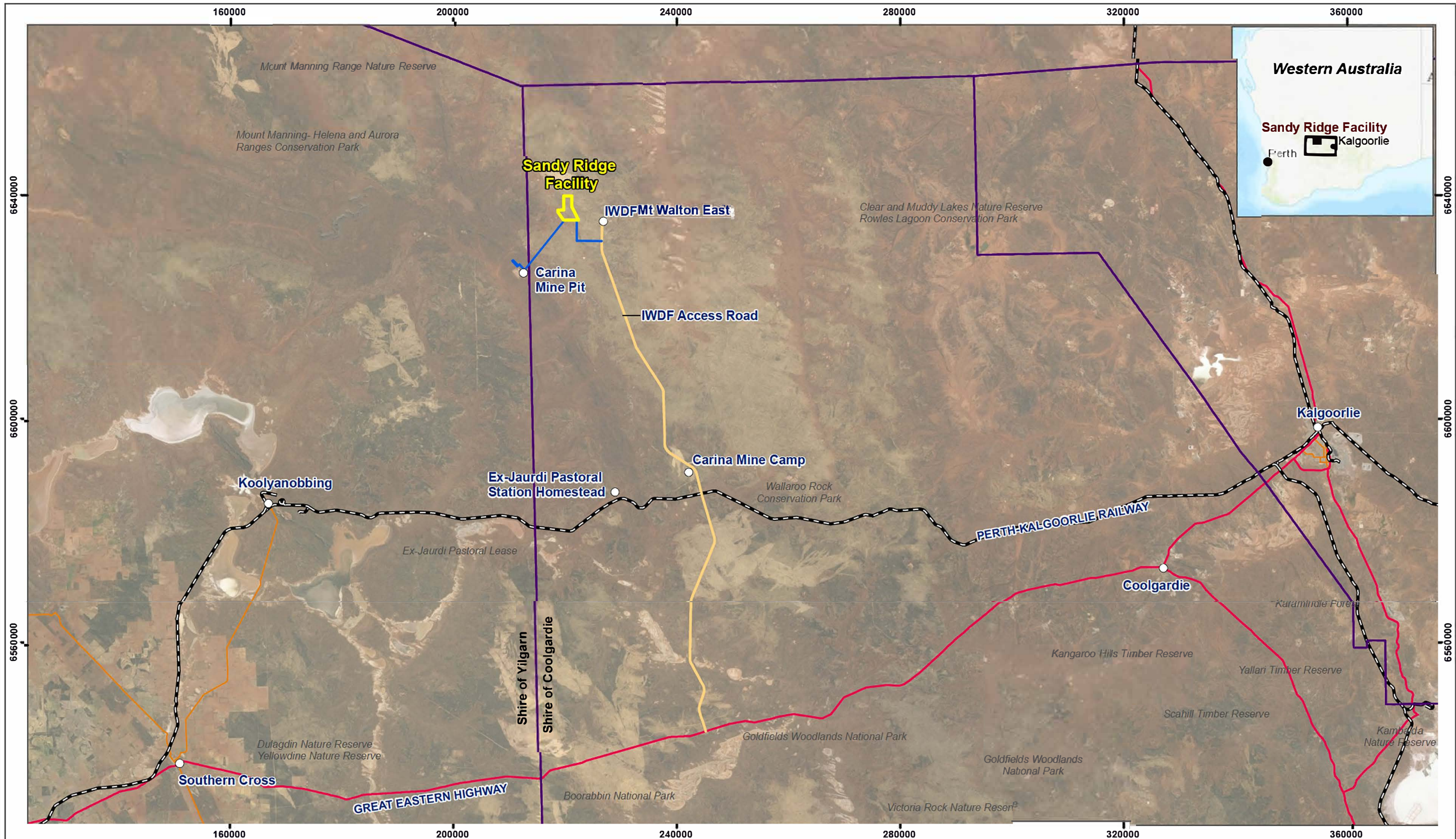
1.7 Format of the report

The format of this Compliance Report is as follows:

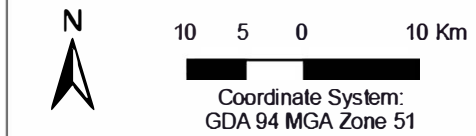
- Authorised Reporting Officer's endorsement, including Tellus' declaration of accuracy.
- Executive Summary.
- Section 1 is an introduction and provides the scope and nature of the audit.
- Section 2 briefly describes the implementation status of the Project during the reporting period.
- Section 3 summarises the compliance issues identified and provides corrective and preventative measures to improve the environmental performance at the Facility.
- Section 4 provides the limitations of the report.
- Section 5 provides references used in this Compliance Report.

Appendix A presents the Audit Table, a tabulated review of the audit results against the requirements of EPBC 2015/7478.

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



Data in this map is sourced from: © Commonwealth of Australia (Geoscience Australia) 2018 and © State of Western Australia (Department of Mines, Industry Regulation and Safety) 2018.



Drawn by: DS

TSR0485_LA_RegionalLocation.mxd

Tellus Holdings Ltd makes every effort to ensure this map is free of errors but does not warrant the map or its features are either spatially or temporally accurate or fit for a particular use. Tellus Holdings Ltd provides this map without any warranty of any kind whatsoever, either expressed or implied.

**Figure 1-1
Regional Location**

EPBC 2015/7478
SANDY RIDGE FACILITY



Version: A
Date: 14/07/2020

2 IMPLEMENTATION STATUS

Table 2-1 summarises the status of project approvals secured during the reporting period.

Table 2-1 – Approvals update

Approvals	Start	Finish
Major approvals, permits and licences from the Australian, WA and Local Government required to temporarily store waste on-site	-	Complete
Site Registration - Controlled Waste Facility No. 39106650	-	Complete
W6305/2019/1 - Works Approval #2 - to authorise the construction of the temporary waste storage area.	20/12/2019	19/12/2022
W6308/2019/1 - Works Approval #3 - to authorise the construction of the main processing and treatment infrastructure of the Facility.	07/02/2020	06/02/2023
Operating Licence - Surface storage licence (Cat. 61 liquid waste and 61A solid waste activities) - L9240/2020/1	29/06/2020	28/06/2040

Registration R2498/2019/1 was granted in November 2019 for the operation of the wastewater treatment plant, and registration R2501/2020/1 was granted in February 2020 for the premises domestic putrescible landfill.

2.1 Pre-construction

Pre-construction activities were completed prior to the first reporting period.

2.2 Construction

Table 2-2 summarises the status of construction activities during the reporting period. Stage 2A and Stage 2B construction works include engineering, procurement, construction, commissioning and performance testing of Facility infrastructure.

Table 2-2 – Construction update

Activities	Start	Finish
Stage 1 Enabling works and procurement of long-lead items	7 July 2019	Complete
Stage 2A Permanent village and 3,000 t East Yard temporary surface storage facility construction	15 September 2019	Complete
Stage 2B Air dome construction	-	Complete
Stage 2B Balance of works (incl. mining first cell) with 100,000 tpa capacity (Works Approval - W6308/2019/1)	-	Late September 2020

2.3 Operations

Table 2-3 summarises the status of operational activities during the reporting period.

Table 2-3 – Operations update

Activities	Start	Finish
Solid hazardous waste (NEPM ¹ 75) and NORM (LLW) temporary surface storage (WA only)	6 July 2020	25 years
Solid and liquid hazardous waste (NEPM 75) and NORM (LLW) temporary surface storage (Australia wide)	July / August 2020	25 years

2.4 Decommissioning

No decommissioning activities were conducted during the reporting period.

¹ National Environment Protection Measure

3 DETAILS OF FINDINGS

Table 3-1 provides a summary of the performance categories in respect to the compliance status for each requirement of EPBC 2015/7478 as defined in *Annual Compliance Report Guidelines* (Commonwealth of Australia, 2014, p.9).

Table 3-1 – Compliance status terms

Compliance Status Term	Definition
Compliant	'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions.
Non-compliant	A designation of 'non-compliance' has been given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met.
Not Applicable	A designation of 'not applicable' has been given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition which applies to an activity that has not yet commenced.

The overall status of compliance with the Conditions of EPBC 2015/7478 for the reporting period is summarised in Table 3-2.

Requirements considered non-compliant, or not applicable, have been consolidated and are summarised in Table 3-3. The table includes a discussion of the compliance status and corrective and preventative actions for improvement where appropriate.

Tellus has provided comments next to each requirement to explain evidence relevant to each requirement. Where considered relevant, observations have been made regarding specific compliance issues.

Table 3-2 – Overall compliance assessment of EPBC 2015/7478

Number of Conditions Compliant	Number of Conditions Non-compliant	Number of Conditions Not Applicable
7	1	7

Table 3-3 – Summary of EPBC 2015/7478 non-compliant conditions

Condition No.	Condition	Compliance Status	Comments
A.1	To manage the impacts of the action on the environment , the approval holder must comply with conditions 1 and 9 attached to the WA approval to the extent those conditions apply to the taking of the action specified in this approval.	Non-compliant	<p>One non-compliance with Condition 1 of Ministerial Statement 1078 (MS 1078) occurred reporting period of 27 June 2019 to 26 June 2020. The non-compliance occurred on 19 July 2019 and concerned the unauthorised clearing of 43m² of vegetation outside of the approved development envelope.</p> <p>Tellus provided details of the unauthorised clearing to DAWE (formerly DoEE) on 19 August 2019 [04a] noting that the non-compliance did not involve Matters of National Environmental Significance as listed under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> and associated Regulations. DAWE responded to Tellus on 2 September 2019 [04b] acknowledging that the Western Australian Department of Water and Environmental Regulation (DWER) had been advised of the non-compliance and that that “<i>incident did not result in any impacts to Matters of National Environmental Significance</i>”. No further correspondence was received from DAWE concerning the non-compliance.</p> <p>DWER was first notified of the non-compliance on 2 August 2019 when Tellus became aware of the non-compliance [14]. Tellus also provided further details of the unauthorised clearing to DWER on the 6 August 2019 [05] and 15 August 2019 [03] in accordance with the Compliance Assessment Plan for MS 1078. The formal notice of non-compliance submitted by Tellus to DWER on 15 August 2019 included details of the corrective actions that had been implemented and were planned. The formal notice of non-compliance submitted by Tellus to DWER on 15 August 2019 included details of the corrective actions that had been implemented and were planned.</p> <p>DWER provided formal acknowledgement to Tellus of the non-compliance with Condition 1-1 of MS 1078 in a letter dated 16 September 2019 [01]. In their letter DWER noted that it had reviewed the corrective actions implemented by Tellus to address the non-compliance and considered the issue as being satisfactorily managed. The non-compliance was also reported in the DWER Desktop Audit Report [02] of the annual MS 1078 Compliance Assessment Report.</p> <p>Rehabilitation of the impacted area occurred at the end of November 2019 as shown in Appendix D, Plate 1 of the MS 1078 Compliance Assessment Report No.2 2019/2020.</p>

3.1 Environmental management plans

Table 3-4 summarises the management plans that were submitted to the Minister and their approval status during the reporting period.

Table 3-4 – Submitted and approved management plans

Condition No.	Management Plan	Date Prepared / Revised	Approval Date
A.2.1	Deep Groundwater Monitoring and Management Plan, V1	15 May 2020	29 May 2020

Implementation of the above referenced plan is discussed in Appendix A.

4 LIMITATIONS OF THIS REPORT

This report has been prepared by Tellus Holdings Ltd (Tellus) based on generally accepted practices and standards and information (including site conditions) available/present when it was prepared (between 7 July 2020 and 31 August 2020).

No other warranty, expressed or implied, is made as to the professional advice included in this Report. This report was prepared in accordance with the purpose outlined in EPBC 2015/7478, dated 7 January 2019. No responsibility is accepted for use of any part of this report in any other context or for any other purpose or by third parties. Where this report indicates that information has been provided to Tellus by third parties, Tellus has made no independent verification of this information except as expressly stated in the report. Tellus assumes no liability for any inaccuracies in or omissions to that information.

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5 REFERENCES

5.1 Supporting, verifying information, documentation

Name	Document Type
[01] DWER Notice of Non-compliance MS 1078 2019 09 16.pdf	Letter
[02] DWER CAR 2018-2019 Desktop Audit Report 2020 10 24.pdf	Report
[03] Tellus Report of NCR Clearing 2019 08 15.pdf	Letter
[04a] Tellus Non Conformance Notification Email 2019 08 19.pdf	Letter
[04b] DAWE Non Conformance Response Email 2019 09 02.pdf	Letter
[05] Tellus Transmittal SRDP001-000112 MS1078 Clearing 2019 08 06.pdf	Transmittal
[06] Tellus Deep Groundwater Monitoring and Management Plan 2020 05 15.pdf	Management Plan
[07] DAWE DGMMMP V0 Approval Letter 2020 05 29.pdf	Letter
[08] Tellus FVMP Key Aspects Checklist 2020 05 08.pdf	Form
[09] Tellus Leachate Monitoring and Management Plan (1).pdf	Management Plan
[10] DWER Leachate Monitoring Management Plan Approval.pdf	Letter
[11a] Tellus Commencement of the Action Notification 2019 07 18.msg	Email
[11b] DAWE Acceptance of Commencement of the Action Notification 2019 07 181.msg	Email
[12] DAWE Commencement of the Action Acknowledgement 2019 08 20.pdf	Letter
[13] Environmental Management System Certificate.pdf	Certificate

5.2 External references

A Commonwealth of Australia. 2014. [Annual Compliance Report Guidelines](#).

Appendix A - EPBC 2015/7478 Audit Table

- This Audit Table is a summary of the requirements applying to this Proposal. Refer to the Approval issued for the proposal under Part 9 of the EPBC Act for details/precise wording of audit elements.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
Part A – Conditions Specific to the Action				
A.1	To manage the impacts of the action on the environment, the approval holder must comply with conditions 1 and 9 attached to the WA approval to the extent those conditions apply to the taking of the action specified in this approval.	Non-compliant	<p>[01] DWER, 2019, Statement 1078 Sandy Ridge Facility Notice of Non-compliance, Letter, Ref: DWERDT190121, 16 September 2019.</p> <p>[02] DWER, 2019, Compliance Audit Report, 24 October 2019.</p> <p>[03] Tellus, Letter, 2019, Clearing of Native Vegetation Outside Development Envelope, Ref: HS00-1760150200-22364, 15 August 2019.</p> <p>[04a] Tellus, Email, Tellus to DAWE, 2019, DoEE Sandy Ridge Facility Non-Conformance Notification Letter, Monday 19 August 2019 @9:10AM.</p> <p>[04b] DAWE, Email DAWE to Tellus, 2019, DoEE Sandy Ridge Facility Non-Conformance Notification Letter, Monday 2 September 2019 @12:48PM.</p> <p>[05] Tellus, Transmittal, Tellus to DWER, 2019, MS 1078 Clearing, Transmittal No.: SRDP001-000112, 6 August 2019, 03:17:08 PM.</p> <p>[08] Sandy Ridge – Flora and Vegetation Management Plan - Awareness Checklist, Ref: DOCID-88105952-934, 19 May 2020.</p> <p>[14] Email, Tellus to DWER, 2019, Sandy Ridge Facility Potential Non-compliance, Tellus-000001, 2 August 2019 @03:50PM.</p>	<p>Condition 1 of MS 1078 – Non-compliant</p> <p>One non-compliance with Condition 1 of Ministerial Statement 1078 (MS 1078) occurred reporting period. The non-compliance occurred on 19 July 2019 and concerned the unauthorised clearing of 43m² of vegetation outside of the approved development envelope during initial construction activities.</p> <p>Tellus provided details of the unauthorised clearing to DAWE (formerly DoEE) on 19 August 2019 [04a] noting that the non-compliance did not involve Matters of National Environmental Significance as listed under the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> and associated Regulations. DAWE responded to Tellus on 2 September 2019 [04b] acknowledging that the Western Australian Department of Water and Environmental Regulation (DWER) had been advised of the non-compliance and that that “incident did not result in any impacts to Matters of National Environmental Significance”. No further correspondence was received from DAWE concerning the non-compliance.</p> <p>DWER was first notified of the potential non-compliance on 2 August 2019 when Tellus became aware of the issue [14]. Tellus provided further details of the clearing event to DWER on the 6 August 2019 [05] and 15 August 2019 [03] in accordance with the approved Compliance Assessment Plan for MS 1078. A formal notice of non-compliance submitted by Tellus to DWER on 15 August 2019 included details of corrective actions that had been implemented and that were planned. DWER provided formal acknowledgement to Tellus of the non-compliance with Condition 1-1 of MS 1078 in a letter dated 16 September 2019 [01]. In their letter DWER noted that it had reviewed the corrective actions implemented by Tellus to address the non-compliance and considered the issue as being satisfactorily managed. The non-compliance was also reported in the DWER Desktop Audit Report [02] of the annual MS 1078 Compliance Assessment Report.</p> <p>Rehabilitation of the impacted area occurred at the end of November 2019 and is shown in Appendix D, Plate 1 of the MS 1078 Compliance Assessment Report No.1 2019/2020.</p> <p>Condition 9 of MS 1078 - Compliant</p> <p>The DWER Desktop Audit Report [02] of the annual MS 1078 Compliance Assessment Report No.1, 2018/2019, identified Condition 9-1 to be compliant and Condition 9-2 to be ‘Not required at this stage’. Conditions 9-3 to 9-6 were not applicable until Condition 9-2 had been triggered. In their draft annual Compliance Assessment Report No. 2, 2019/2020 [to be submitted to DWER by 23 September 2020] Tellus identified the compliance status of Condition 9 to be as follows:</p> <ul style="list-style-type: none"> • Condition 9-1 = Compliant. • Condition 9-2 = Compliant. • Condition 9-3 = Compliant. • Condition 9-4 = Not Applicable. • Condition 9-5 = Not Applicable. • Condition 9-6 = Not Applicable.

¹ Refer to Section 5.1 Supporting, verifying information, documentation.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
A.2.1	To enable the early detection of any leachate and to protect the environment from impacts from leachate to deep groundwater, the approval holder must submit a deep groundwater monitoring and management plan. The deep groundwater monitoring and management plan must commit the approval holder to undertake monitoring and management of potential impacts to the groundwater within the weathered granite and granite hard rock (bedrock) as specified below. The approval holder must not commence waste receipt unless the Minister has approved the deep groundwater monitoring and management plan in writing. If the Minister approves the deep groundwater monitoring and management plan then the approved deep groundwater monitoring and management plan must be implemented.	Compliant	[06] Tellus, 2020, Deep Groundwater Monitoring and Management Plan, VO, HS00-1760150200-49244, 15 May 2020. [07] DAWE, Approval Letter, 2020, EPBC 2015/7478: Sandy Ridge Project – Deep Groundwater Monitoring and Management Plan, 29 May 2020.	<p>Preparation</p> <p>Tellus submitted the Deep Groundwater Monitoring and Management Plan (DGMMP), dated 15 May 2020 [06] to the Minister on 15 May 2020.</p> <p>DAWE issued a letter to Tellus dated 29 May 2020 [07] that approved the DGMMP [dated 15 May 2020 (Rev0)] in accordance with Condition 2(1) of Part A of EPBC 2015/7478.</p> <p>Implementation</p> <p>The first waste was accepted into temporary waste storage on 6 July 2020. In ground emplacement is scheduled to occur in December 2020.</p> <p>Monitoring of deep groundwater wells as required by the DGMMP is scheduled to follow in-ground emplacement of waste [06, p.xi]. Data interpretation and initial generation of site-based trigger and threshold criteria for shallow groundwater monitoring is scheduled to occur in September 2020 [06, p.xi] in accordance with the approved plan.</p> <p>Given the DGMMP was approved on 29 May 2020, full implementation of the plan did not occur during the reporting period and will not occur until the first cell has been capped which is scheduled to occur after the 2020/2021 reporting period.</p> <p>Table 2-1 of the DGMMP [06, 19] notes that:</p> <ul style="list-style-type: none"> From April 2020 deep groundwater well sampling and monitoring should have commenced until 12 sampling events are achieved. For shallow groundwater wells Tellus has committed to 12 consecutive samples, where possible from January 2020 from the existing 20 wells prior to in-ground waste disposal. <p>At the time of preparing this report a total of eight groundwater monitoring events had been conducted. Refer to Condition A.2.3 for further information concerning groundwater monitoring events (GMEs).</p> <p>The DGMMP [06, p.37] notes that “Extracting enough groundwater to complete chemical and radionuclide laboratory analysis has been a limiting factor at the Facility. This has been an unsurprising result given the site was originally selected for having a distinct absence of a groundwater and/or a defined groundwater table or aquifer”.</p>
A.2.2	The deep groundwater monitoring and management plan must specify:	-	-	-
A.2.2.a	a) monitoring procedures and protocols, including monitoring location points and frequency of monitoring (minimum every six (6) months);	Compliant	[06] / [07]	Section 2 (Monitoring) of the DGMMP addressed monitoring conducted prior to and during the reporting period and planned future monitoring. Appendix G – Groundwater Sampling Procedure, addressed monitoring procedure and protocols. The frequency of monitoring was addressed on Section 2.3.3 [06, p.30 and p.33].
A.2.2.b	b) mitigation and management measures;	Compliant	[06] / [07]	Table 2-1 [06, p.12 and P.13] detailed mitigation actions for the DGMMP. Section 4.8.3 (Facility Manager) of the DGMMP identified that the Facility Manager is responsible for ensuring environmental mitigation/management requirements are implemented.

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Condition No.	Condition	Compliance Status	Evidence ¹	Comments
A.2.2.c	c) an adaptive management framework, including early warning triggers, trigger criteria, monitoring design and methodologies, and trigger management actions;	Compliant	[06] / [07]	<p>Section 2.3.3 [06, p.28] noted that Tellus will complete adaptive sampling and analysis based on a prioritisation of analytical suites in the event sufficient groundwater cannot be extracted for chemical and radionuclide analysis. Table 2-4 [06, p.29] presented groundwater monitoring scenarios and adaptive sampling and analysis.</p> <p>An adaptive management framework was included as Section 3 of the DGMMP that referred to a two-tiered adaptive leachate management and monitoring framework. Figure 3-1 [06, p.47] provided an overview of the adaptive groundwater monitoring and trigger actions.</p>
A.2.2.d	d) incident reporting;	Compliant	[06] / [07]	<p>Incident reporting was addressed in Section 3.2 [06, p.40] of the DGMMP which noted that any incidents would be managed in accordance with the requirements of its certified management system.</p> <p>No incidents concerning the DGMMP were recorded during the reporting period.</p> <p>Tellus is certified to AS/NZS 4801:2001 and AS/NZS ISO 14001:2016. Clause 8.2 of AS/NZS ISO 14001:2016 requires a process(es) to prepare for and respond to potential emergency situations. Clause 4.4.7 of AS/NZS 4801:2001 also requires a process(es) for managing emergency situations and Clause 4.5.2 requires the establishment, implementation and maintenance of procedures for investigation and responding to incidents.</p>
A.2.2.e	e) review periods; and	Compliant	[06] / [07]	<p>Review periods were specified in Section 4.3 [06, p.53] of the DGMMP.</p> <p>The first review of the DGMMP is scheduled for September 2020 following the generation of site specific radiological and chemical groundwater screening levels.</p> <p>The DGMMP stated that "At a minimum, this DGMMP will be revised to address deep groundwater monitoring and management aspects no less than every three years" (p.53).</p>
A.2.2.f	f) implementation reporting and auditing by a suitably qualified person.	Compliant	[06] / [07]	<p>Preparation - Compliant</p> <p>Auditing of the DGMMP was addressed Section 4.3 [06, p.53] of the DGMMP that stated "A suitably qualified third-party consultant will audit the review undertaken by the approval holder triggered by incidents or near misses with the potential for contamination of groundwater, by revisions of applicable legislation or industry standards, or in response to correspondence with DAWE".</p> <p>Implementation – Not Applicable</p> <p>Given the DGMMP was approved on 29 May 2020, reporting and auditing [as specified in the DGMMP] was not triggered during the reporting period.</p> <p>At the time of preparing this report no written request from the Minister was received for an independent audit of EPBC/2015/7478.</p> <p>Compliance Report No.2, 2020/2021 will report on implementation of Condition 2.2.f.</p>

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
A.2.3	To be capable of detecting any potential contamination of groundwater, the deep groundwater monitoring and management plan must include parameters collected during at least 12 months of baseline monitoring of groundwater and soil quality undertaken prior to commencing waste receipt.	Compliant	[06] / [07]	<p>The DGMMP [06, p.25] states that “Where groundwater samples have been taken, they will be compared with neighbouring wells. These samples will be analysed to determine if a statistically significant increase (SSI) in the levels of any of the monitored parameters has occurred”, the DGMMP goes onto state that “After four sampling events since 2016, the results indicate that chemical parameters are below limits of reporting. A further six sampling events are required before the approval holder will be in a position to further analyse baseline data and establish site-based trigger and threshold criteria based on a 95% confidence interval”.</p> <p>At the time of preparing this report a total of eight groundwater GMEs had been conducted.</p> <ul style="list-style-type: none"> • 22 groundwater monitoring bores (GMBs) are located on-site. • During GMEs approximately half of these GMBs did not contain water during the reporting period. • In line with the DWER approved Leachate Monitoring Management Plan (LMMP) and DGMMP, six GMBs are sampled during each GME. The six GMBs are located within a 1km radius of Cell/Pit 1 and contained sufficient water to collect a sample during the reporting period. • During the reporting period groundwater has been gauged at between 20 to 40 meters below ground level (mbgl) from the GMBs sampled. • During the reporting period the pH of groundwater samples ranged from 5.83 to 7.86 (slightly acidic to slightly alkaline). • Excluding major cations/anions and physiochemical parameters, the majority of analytes are reported below laboratory limit of reporting (LOR). The groundwater sampling method is being continually reviewed to better understand if trace detections above LOR are reflective of background conditions or caused by other means. <p>In-ground emplacement of waste is scheduled to occur at the Facility in October 2020. Monitoring of deep groundwater wells post in-ground emplacement of waste is scheduled to commence in November 2020 [06, p.xi]. Data interpretation and initial generation of site-based criteria for shallow groundwater monitoring is scheduled to occur in September 2020 [06, p.xi].</p>

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Condition No.	Condition	Compliance Status	Evidence ¹	Comments
A.3	To exclude potential floodwaters from the site and to prevent the release of potentially contaminated floodwaters to the environment, the approval holder must ensure that any surface water that enters or leaves the action area cannot spread contaminants out of the action area. To meet this objective the approval holder must ensure that monitoring of the action's impacts is capable of detecting any contaminants before they can be transported out of the action area.	Compliant	<p>Licence L9240/2020/1 (www.dwer.gov.au).</p> <p>Works Approval W6243/2019/1 (www.dwer.gov.au).</p> <p>Works Approval W6305/2019/1 (www.dwer.gov.au).</p> <p>Works Approval W6308/2019/1 (www.dwer.gov.au).</p> <p>[09] Tellus, Leachate Monitoring and Management Plan, Version E², 7 May 2020, Ref: HS00-1760150200-49173.</p> <p>[10] DWER, Letter, 2020, Sandy Ridge Facility Ministerial Statement 1078 Leachate Monitoring and Management Plan Approved, 14 May 2020, Ref: DWERDT280973; DWERT463.</p>	<p>Physical Infrastructure</p> <p>The first waste was accepted into temporary waste storage on 6 July 2020. Tellus has constructed the Facility to meet the requirements of Table 1 (p.10) of Licence L9240/2020/1 issued by DWER on 29 June 2020 that requires the following concerning surface water management:</p> <ul style="list-style-type: none"> • Temporary Waste Storage Area - "Sloped to allow surface water within the Temporary Waste Storage Area to drain to the Stormwater Retention Pond". • Temporary Waste Storage Area Stormwater Drains - "(a) Stormwater diversion drain located on the eastern side of the temporary waste storage area capable of diverting surface storm water away from the Temporary Waste Storage Area; and (b) Stormwater drain located within the temporary waste storage area capable of diverting surface storm water within the Temporary Waste Storage Area to the Stormwater Retention Pond". • Temporary Waste Storage Area Earth Bund - "To contain any liquid or solid waste that may discharge from waste containers within the Temporary Waste Storage Area" • Stormwater Retention Pond - "Total capacity of 3,926 m3, capable of capturing a 1 in 100 year 72-hour storm event from the Temporary Waste Storage Area". <p>At the time of first temporary waste acceptance only the stormwater retention pond located adjacent to the temporary waste storage area had been commissioned. Commissioning of main site infrastructure commenced at the start of August 2020 and is scheduled to be completed by the end of September 2020.</p> <p>Figure 2 (p.6) of Works Approval W6243/2019/1 issued on 20 April 2019 by DWER specifies the civil earthworks design for drainage of the infrastructure area.</p> <p>Column 2, Table 2 (pp.9-17) of Works Approval W6308/2019/1 issued on 7 February 2020 and amended 27 March 2020 by DWER states the design and construction requirements for the specific areas of the Facility including, but not limited to the waste storage – east yard, PFAS contaminated waste storage area and the low-level radiation waste liquid waste and sludge storage yard. Drainage requirements are stated in column 2 of Table 2 (pp.9-17). External areas are designed to drain towards blind sumps or two stormwater retention ponds. Covered waste storage areas are designed to drain to internal blind concrete sumps which will be pumped out into 1,000 L Intermediate Bulk Containers (IBCs) if full. Internal procedures will determine where and how the contents of the IBCs will be managed.</p> <p>Table 5 (pp.24-27), Schedule 2 of W6308/2019/1 provides specific works against referenced specifications and drawings for the Facility.</p> <p>To mitigate potential floodwaters entering the Facility a flood levee measuring approximately 1 km by 11 m in width has been constructed to the east of the infrastructure area.</p> <p>Monitoring</p> <p>Monitoring of stormwater ponds to identify potential contaminants will be managed in accordance with a stormwater management procedure. At the time of preparing this report the procedure was in draft form and awaiting review and approval prior to commencement of operations.</p>

² Version E being the first approved version of this plan (i.e. Version 0).

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
A.4	To ensure a nationally consistent approach to the environmental regulation of PFAS, the approval holder must implement the PFAS National Environmental Management Plan.	Not Applicable	-	<p>The first waste was accepted into temporary waste storage on 6 July 2020, the last day of this reporting period, and did not include any PFAS-containing material. In-ground waste emplacement is scheduled to occur in December 2020.</p> <p>Operational activities did not commence during the reporting period; therefore, this requirement was not triggered.</p> <p>The design of Facility infrastructure will facilitate compliance with certain requirements of the PFAS National Environmental Management Plan. Facility commissioning reports were in the process of being prepared at time of preparing this report.</p> <p>Compliance Report No.2, 2020/2021 will report on implementation of the PFAS National Environmental Management Plan.</p>
A.5	The approval holder must ensure waste emplacement is undertaken as described in the action description of this approval notice. The approval holder must not emplace waste by borehole disposal (commonly referred to as the BOSS method).	Not Applicable	-	<p>The first waste was accepted into temporary waste storage on 6 July 2020, one day before the end of the reporting period. In-ground emplacement is scheduled to occur in December 2020.</p> <p>Emplacement of waste by borehole disposal (commonly referred to as the BOSS method) is not currently planned for operational activities.</p>
Part B – Standard Administrative Conditions				
B.6	<p>Notification of the date of commencement of the action</p> <p>The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.</p>	Compliant	<p>[11a] Tellus, Email, Tellus to DAWE, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @12:27pm.</p> <p>[11b] DAWE, Email, DAWE to Tellus, 2019, EPBC 2015/7478 Sandy Ridge Facility - commencement notification, 18 July 2019 @2:31pm.</p> <p>[12] Letter, DAWE, 2019, Commencement of the Action – Sandy Ridge Project, WA (EPBC 2015/7478), Ref: 2015/7478, 20 August 2019.</p>	<p>On 18 July 2019 [11a] Tellus notified by email the Department's Post Approvals Section that commencement of the action occurred on 7 July 2019. The Department acknowledged the notification in a return email, also dated 18 July 2019 [11b].</p> <p>The Department formally responded to the notification of commencement of the action in a letter dated 20 August 2019 [12], noting that the Annual Compliance Report for the period of 7 July 2019 to 6 July 2020 must be published by 3 September 2020, and submitted to the Department within five business days of publication.</p>
B.7	<p>Compliance records</p> <p>The approval holder must maintain accurate and complete compliance records.</p>	Compliant	<p>[13] AS/NZS ISO 14001:2016 Environmental Management Systems Certificate.</p> <p>Online Health, Safety & Environmental software (www.inxsoftware.com).</p>	<p>Tellus operates a management system certified to <i>AS/NZS ISO 14001:2016 Environmental Management Systems – Requirements with guidance for use</i>. The most recent external audit of the management system was conducted in April 2020 and recommended Tellus maintain their certification.</p> <p>Tellus has implemented an online health, safety and environment online management software program to facilitate the management of environmental obligations. The system allows for compliance records and tasks to be assigned to specific obligation conditions as well as environmental monitoring data to be managed, including, but not limited to real-time data and chains of custody.</p> <p>Waste management records are maintained using the company's online waste management system.</p>
B.8	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Not Applicable	-	There have been no known requests from the Department concerning electronic copies of compliance records, therefore this requirement was not triggered within the reporting period.

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Condition No.	Condition	Compliance Status	Evidence ¹	Comments
B.9	Annual compliance reporting The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:	Compliant	-	This is the first Compliance Report to be written for EPBC 2015/7478 hence no report has yet been published to the Sandy Ridge Facility Regulatory Information page of the Tellus website.
B.9.a	a) publish each compliance report on the website within 60 business days following the relevant 12-month period;	Compliant	Sandy Ridge Facility Compliance Report No.1 2019/2020. Sandy Ridge Facility Regulatory Information page, Tellus website (www.tellusholdings.com).	This is the first Compliance Report to be written for EPBC 2015/7478 hence no report has been published to the Sandy Ridge Facility Regulatory Information page of the Tellus website. The Compliance Report for the reporting period 2019 – 2020 will be published to the Sandy Ridge Facility Regulatory Information page of the Tellus website within 60 business days following the relevant 12-month period.
B.9.b	b) notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;	Compliant	Sandy Ridge Facility Compliance Report No.1 2019/2020. Sandy Ridge Facility Regulatory Information page, Tellus website (www.tellusholdings.com).	This is the first Compliance Report to be written for EPBC 2015/7478 hence no report has been published to the Sandy Ridge Facility Regulatory Information page of the Tellus website. The Department will be notified by email that the Compliance Report has been published on the website within five business days of the date of publication. Evidence of the notification will be included in the Compliance Report for the reporting period 2020 – 2021.
B.9.c	c) keep all compliance reports publicly available on the website until this approval expires;	Compliant	Sandy Ridge Facility Compliance Report No.1 2019/2020. Sandy Ridge Facility Regulatory Information page, Tellus website (www.tellusholdings.com).	This is the first Compliance Report to be written for EPBC 2015/7478 hence no report has been published to the Sandy Ridge Facility Regulatory Information page of the Tellus website. Compliance Reports will be publicly available on the Sandy Ridge Facility section of the Tellus website until EPBC 2015/7478 expires.
B.9.d	d) exclude or redact sensitive ecological data from compliance reports published on the website ; and	Not Applicable	Sandy Ridge Facility Compliance Report No.1 2019/2020.	The Sandy Ridge Facility Compliance Report No.1 2019/2020 does not include any sensitive data ecological data that requires redacting.
B.9.e	e) where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.	Not Applicable	Sandy Ridge Facility Compliance Report No.1 2019/2020.	The Sandy Ridge Facility Compliance Report No.1 2019/2020 does not include any sensitive data ecological data that requires redacting.
B.10	Reporting non-compliance The approval holder must notify the Department in writing of any: incident ; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: <ul style="list-style-type: none"> a) the condition which is or may be in breach; and b) a short description of the incident and/or non-compliance. 	Compliant	Refer to Condition A.1 for further details.	Other than the non-compliance noted in Condition A.1 no other incident or non-compliance with the requirements of EPBC 2015/7478 occurred during the reporting period. Refer to Condition A.1 for further details.
B.11	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying: <ul style="list-style-type: none"> a) any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future; b) the potential impacts of the incident or non-compliance; and c) the method and timing of any remedial action that will be undertaken by the approval holder. 	Compliant	Refer to Condition A.1 for further details.	Refer to Condition A.1 for further details concerning details of notification to DAWE for the clearing of 43m ² of vegetation outside of the approved development envelope. Other than the non-compliance noted in Condition A.1 no other incident or non-compliance with the requirements of EPBC 2015/7478 occurred during the reporting period.
B.12	Independent audit The approval holder must ensure that independent audits of compliance with the conditions are conducted as requested in writing by the Minister .	Not Applicable	-	There has been no known request from the Minister concerning an independent audit, therefore this requirement was not triggered within the reporting period.

EPBC 2015/7478				
Condition No.	Condition	Compliance Status	Evidence ¹	Comments
B.13	For each independent audit, the approval holder must: <ul style="list-style-type: none"> a) provide the name and qualifications of the independent auditor and the draft audit criteria to the Department; b) only commence the independent audit once the audit criteria have been approved in writing by the Department; and c) submit an audit report to the Department within the timeframe specified in the approved audit criteria. 	Not Applicable	-	Not Applicable (not triggered).
B.14	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	Not Applicable	-	Not Applicable (not triggered).
B.15	Completion of the action Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	Not Applicable	-	Not Applicable (not triggered).