



Independent Audit Brief

Gippsland Lakes Ocean Access Maintenance Dredging

Prepared by: Gippsland Ports

Table of Contents

1	Gippsland Lakes Ocean Access (GLOA) Description.....	3
2	Introduction.....	3
2.1	Background.....	3
2.2	Approvals.....	4
2.3	Environmental Risk Register (ERR)	4
2.4	Environment Management Plan (EMP).....	5
3	Audit Requirements	5
3.1	Scope of Independent Audits	5
3.2	Auditor Knowledge and Skills.....	6
3.3	Timing of Audit.....	6
4	Methodology	7
4.1	Ranking of Compliance	7
4.2	Audit Preparation	8
4.2.1	Audit Plan and Scope	8
4.2.2	Audit Checklists	8
4.3	Audit Commencement Meetings	8
4.4	Report Audit Findings	9
4.4.1	Findings Summary.....	9
4.4.2	Detailed Findings	10
4.5	Reporting / Deliverables.....	18

APPENDIX

APPENDIX 1.....	18
APPENDIX 2 – DRAFT Audit Plan.....	19
APPENDIX 3 – DRAFT Audit Checklists.....	21

Tables

Table 1: Compliance Assessment Ratings.....	7
Table 2: Summary Compliance Grades	7
Table 3: Summary of PDS Compliance Findings.....	9
Table 4: Detailed Audit Findings – Operational Management (all activities and areas) PDS 10	
Table 5: Detailed Audit Findings – Marine-based works (all areas) PDS.....	12
Table 6: Detailed Audit Findings – Dredging and plume PDS.....	14
Table 7: Detailed Audit Findings – Dredging schedule PDS.....	15
Table 8: Detailed Audit Findings – Dredged material management PDS.....	16
Table 9: Detailed Audit Findings – External notification and reporting requirements	17

Figures



1 Gippsland Lakes Ocean Access (GLOA) Description

The Gippsland Lakes are located approximately 300 km east of Melbourne. Covering a vast area, the lakes are a series of large, shallow, coastal lagoons approximately 70 km in length and 10 km wide, separated from the sea by sand dunes.

The Gippsland Lakes together form the largest navigable inland waterway in Australia and create a distinctive regional landscape of wetlands and flat coastal plains of considerable environmental significance.

Access between the lake system and Bass Strait is by way of an artificial entrance (**the Entrance**) constructed in 1889. Dredging to remove ocean sand from the navigable channels within the lakes has been necessary since that time. In addition, a large and hazardous sand bar (**the Bar**) formed outside the Entrance and in the past required continuous dredging using a Side Cast Dredge (SCD) the *April Hamer*.

The area landward of the Entrance was listed as a Ramsar site in 1982 for its key environmental values at that time. Currently, parts of the Lakes system are heavily used for commercial and recreational fisheries and boating activities, while the immediate hinterland has been developed for agricultural use, and residential and tourism purposes.

Of the more than 400 square kilometres of the Gippsland Lakes, the proposed maintenance dredging is to occur over approximately 3 square kilometres in total.

In order to maintain ocean access between the Gippsland Lakes and Bass Strait, Gippsland Ports must conduct maintenance dredging at Lakes Entrance in the Inner Channels and the Bar. For over 30 years to 2008 maintenance of the Bar was undertaken using a side casting dredge *April Hamer*. From 2008 dredging began with a Trailing Suction Hopper Dredging (TSHD) contracted dredger *Pelican*. From 2017, Gippsland Ports has owned TSHD. Tommy Norton has continued the dredging program, depositing dredge material in approved Dredge Material Grounds (DMG) either side of the Entrance channel.

2 Introduction

The services of an independent auditor are required to complete an annual audit of compliance with the Environment Management Plan (EMP) for GLOA sand management activities. These independent annual audits will be in addition to internal audits undertaken by Gippsland Ports or external audits by other agencies.

2.1 Background

Gippsland Ports are acting under relevant approvals to undertake sand management activities from 2023 to 2033.

The current sand management activities do not differ from those undertaken from 2008 to 2023 under the previous approvals; and work methods and outcomes have been well established and documented.



2.2 Approvals

Approvals currently in place of relevance to maintenance dredging are:

Marine And Coastal Act 2018 (MACA) SP481563

Issued 11 May 2023 by the Victorian Department of Energy, Environment and Climate Action (DEECA).

The MACA consent includes a condition requiring an EMP to be approved and implemented, which includes an independent audit process.

Sea Dumping Permit No SD2022/4039

Issued 24 October 2023 by the Federal Department of Climate Change, Energy, Environment and Water (DCCEEW)

Environment Protection and Biodiversity Conservation Act 1999 – Referral Decision

Issued 8 September 2011 by Federal Department of Sustainability, Environment, Water, Population and Communities (now DCCEEW)

Environmental Effects Act 1978 – Referral number 2007R00017. Issued 10 January 2008

Each approval lists conditions that must be complied with. A copy of all approvals will be provided to the Auditor for information.

The applications for each of the above approvals were supported by reports, plans and documents including Environmental Risk Assessment (ERA), Environmental Risk Register (ERR), and Environment Management Plan (EMP).

The MACA consent is the only approval that includes a condition requiring compliance with an approved EMP; however, both the Sea Dumping Permit and EPBC and EES referrals included an EMP in supporting information.

2.3 Environmental Risk Register (ERR)

The Environmental Risk Register (ERR) is an evidence-based assessment of risks associated with GLOA. It presents in a tabular format the:

- identified potential risks (Activity, Stressor, Effect)
- evidence available in respect of each risk
- inherent (unmanaged) likelihood and consequence of each risk
- management solutions
- residual (managed) likelihood and consequence of each risk

The risk treatment / mitigation measures identified by the Environmental Risk Assessment (ERA) have been transferred to the EMP as *environmental controls*.

The ERR which is based on the ERA will provide a benchmark for the Auditor to assess the risk (including likelihood and consequence) associated with the Project Delivery Standards (PDS) listed in the EMP.

The ERR has been approved by DEECA as required in Condition 3 of the current MACA consent.



2.4 Environment Management Plan (EMP)

The Environment Management Plan (EMP) identifies PDS that are aligned to each risk (*activity / stressor / effect*) identified in by the ERA, and documents *environmental controls* required to manage each risk.

The EMP is currently at version 5.1.

The Auditor is to assess Gippsland Ports compliance with the documented environmental controls.

3 Audit Requirements

3.1 Scope of Independent Audits

The annual independent audit is a requirement of the EMP (as approved by DEECA under MACA consent condition 3).

The audit reports will form part of the annual reporting requirements for GLOA activities and are published on Gippsland Ports website.

The objectives of the independent audit are:

1. To undertake an independent compliance audit of the approved EMP including:
 - Independently assess the implementation of the EMP; and
 - Independently gather information verifying compliance.
2. To advise Gippsland Ports of any non-conformances with the EMP.
3. Provide an audit report to Gippsland Ports, outlining compliance and potential improvements.

Note: *The audit does not assess the impact of dredging on the Environmental Health of the Gippsland Lakes. The ERR provides an evidence-based assessment of the impact of dredging and is the basis of the EMP.*

Completion of the Audit will assist Gippsland Ports to satisfy the requirement included in the EMP as follows:

Ref: Section 2.3 of GLOA EMP V5.1 – **External notification and reporting requirements:**

*Annual GLOA
Performance Report*

*Within 90 days of completion of all placement activities
associated with a year-round TSHD program. A year finishes
on 31 December*



Independent Audit Brief
GLOA Maintenance Dredging

Ref: Section 3.2 of GLOA EMP V5.1 – **Audits:**

Annual Independent Audit *GP implementation of the EMP will be audited annually using an external auditor engaged by Gippsland ports, with the audit focussing on the operation of the TSHD.*

The Independent Auditor is engaged by Gippsland Ports to undertake an audit to determine compliance with the EMP approved by DEECA and provide a written report to Gippsland Ports of the audit findings.

3.2 Auditor Knowledge and Skills

The auditor needs to have:

- the skills required to apply the audit principles, procedures and techniques outlined in ISO 19011;
- knowledge of the operations of Gippsland Ports;
- an understanding of the environmental risk profile of the sand management activities;
- the ability to act independently, ethically and be objective.

Gippsland Ports may appoint a peer reviewer to review the work of the Independent Auditor. If Gippsland Ports choose to undertake a peer review, the Independent Auditor must fully cooperate with the reviewer.

The auditor is not required to have ISO 19011 accreditation.

3.3 Timing of Audit

The audit is required to monitor compliance with the EMP during the period the dredge (TSHD) is operational at Lakes Entrance. This will include “desktop” review of documents and records and inspection and observation onboard the dredge. Gippsland Ports will ensure an opportunity is provided for the auditor to be onboard while the dredge is operational.



4 Methodology

The audit methodology must be generally consistent with ISO 19011 - Guidelines for quality and/or environmental management systems auditing.

The audit will adopt a graded assessment of compliance being:

Table 1: Compliance Assessment Ratings

Compliance Status	Significance Categories
Full Compliance	N/A
Compliant (but improvements required)	N/A
Non-Compliant	Critical Major Minor
Not Applicable	N/A
Undetermined	N/A

In carrying out the audit, the auditor may seek expert advice from experienced specialists in dredging activities as required.

4.1 Ranking of Compliance

Compliance ranking is as per previous EMP audits from 2011 to 2023. A grade for 'Compliant but improvements required' is included.

Table 2: Summary Compliance Grades

Compliance Grade	Description
Full compliance	There is sufficient evidence to confirm that actions have been undertaken, prepared and/or implemented in full compliance with the requirements of the auditable element.
Compliance (but improvements required)	There is sufficient evidence to confirm that actions have been undertaken, prepared and/or implemented in compliance with the requirements but improvements can be made to the auditable element.
Minor non-compliance	The evidence shows that actions are not in full compliance with the requirements of the auditable element, but it is unlikely that this will cause the environment to be seriously affected.
Major non-compliance	The evidence shows that actions are not in full compliance with the requirements of the auditable element, and this gives risk to a high potential that the environment will be seriously affected if the non-compliance is not rectified.
Critical non-compliance	The evidence shows that actions are not in full compliance with the requirements of the auditable element, and this gives rise to a serious or imminent risk to the environment.
Not applicable	The auditable element falls outside the scope of the audit, for example: work relevant to the PDS has not yet commenced / PDS no longer applicable / PDS requires review.
Undetermined	There is insufficient evidence to make a judgement on compliance.



4.2 Audit Preparation

4.2.1 Audit Plan and Scope

The audit plan focuses on the period of works relevant to the audit, methodology, and requirements to access information held by Gippsland Ports.

A Draft Audit Plan is attached at APPENDIX 2 – DRAFT Audit Plan.

Prior to commencing the site-work component of the audit, an audit plan must be agreed by Gippsland Ports and the external auditor.

It is important to note that the site-work component of the audit is a relatively minor time-fraction. The majority of the external auditor's time is anticipated to be required in understanding the audit requirements and reviewing the dredging documentation provided.

4.2.2 Audit Checklists

Draft checklists have been completed and provided at APPENDIX 3 – DRAFT Audit Checklists to assist in undertaking site audit tasks. The checklists have been drafted to indicate evidence that Gippsland Ports is collecting to monitor compliance with the EMP. This information will be made available to the auditor for verification.

4.3 Audit Commencement Meetings

An audit commencement meeting must form part of the audit plan, and minutes of this meeting must be completed and provided to Gippsland Ports by the auditor. A DRAFT Audit Commencement Meeting Agenda is included at APPENDIX 2 – DRAFT Audit Plan.

The auditor will be required to complete Gippsland Ports' site induction prior to this meeting, and a vessel specific induction when going aboard the dredge.



4.4 Report Audit Findings

4.4.1 Findings Summary

It is suggested a summary of audit findings be tabulated.
A format such as the following table could be utilised.

Table 3: Summary of PDS Compliance Findings

PDS Requirement	Full Compliance	Compliant but improvements	Minor Non-Compliance	Major Non-Compliance	Critical Non-Compliance	Undetermined	Not Applicable
1. Hours of operation							
2. Airbourne noise							
3. Waste management							
4. Equipment maintenance							
5. Fuels, oils, chemicals and hazardous goods							
6. Emergency response preparedness							
7. Marine pests							
8. Vessel anchoring							
9. Vessel bunkering							
10. Cetaceans – vessel manoeuvring							
11. Cetacean sightings and log							
12. Heritage (marine based) – identification of potential relics							
14. Dredging Turbidity/Grayling Cetaceans Recording							
15. Dredging schedule							
16. Consideration of seasonal sensitivities							
17. Dredged material placement							
18. Disposal site dissipation monitoring							
19. Notification and Reporting							



Independent Audit Brief
GLOA Maintenance Dredging

4.4.2 Detailed Findings

It is suggested that detailed audit findings be presented in a table.
A format such as the following table could be utilised.

Table 4: Detailed Audit Findings Operational Management (all activities and areas) PDS

PDS Requirement	Evidence	Audit Findings and Comments	Compliance
1. Hours of operation			
All activities may be conducted on a 24 hour, 7 days a week basis, except where explicitly restricted within this EMP, or by legislation.	Ships Logbook Daily Report Site Diary Trip Reports Track Plots	Note – these documents are all scanned and held electronically on GP's network.	
2. Airbourne noise			
All activities must be conducted within calculated SEPP N-1 limits.	Dredge testing Feedback/complaints		
Airbourne noise monitoring will be conducted if and when stakeholder feedback and/or complaints received indicate equipment used in facilitating GLOA is resulting in non-compliance.	Feedback file	Check GP's feedback system	
Noise monitoring will be conducted in accordance with the procedure outlined in Annexure 4.			
3. Waste management			
All marine vessels to have sewage containment facilities.	<i>Tommy Norton</i> – vessel description <i>Kalimna</i> – vessel description		
No disposal of untreated sewage or other waste to waterway.	Ship's log Pumpout records Waste Contractor records		
Contractor waste management arrangements to include waste minimization, containment, segregation and appropriate reuse, recycling, treatment, and disposal.	Ship's log Ship's procedures Observation while on board Pers.com. with Ship's Master		
The handling and disposal of unexpected materials identified during dredging (eg. Inert debris such as steel sections and timber) to be included in waste management arrangements.	Ship's log Mapping of wreck clearly shown on charts		
All waste to be managed in accordance with: > <i>Environment Protection Act 1970 (Vic)</i> > <i>Quarantine Act 1908 (Commonwealth)</i> for applicable vessels <i>Pollution of Waters by Oil and Noxious Substances Act 1986 (Vic)</i>	Ship's procedures		
4. Equipment maintenance			
Maintenance programs will be implemented for all plant and equipment as defined in GP's procedures and the <i>Occupational Health and Safety Regulations 2007 (Vic)</i> .	Vessel Programmed Maintenance System (PMS) and maintenance logs		



Independent Audit Brief
GLOA Maintenance Dredging

PDS Requirement	Evidence	Audit Findings and Comments	Compliance
5. Fuels, oils, chemicals, and hazardous goods			
Storage and handling of chemicals in accordance with: > <i>Dangerous Goods Act 1985 (Vic)</i> > <i>International Ship Management (ISM) Code</i> for applicable vessels > <i>Pollution of Waters by Oil and Noxious Substances Act 1986 (Vic)</i>	Inspection while on board and personal communication		
Asbestos audits indicate that no asbestos is present in any GLOA infrastructure, however, should asbestos be found, it will be managed in accordance with the <i>Occupational Health and Safety Regulations 2007 (Vic)</i> .	Ships Asbestos certification/register		
6. Emergency response preparedness			
Development and testing of emergency response procedures, integrated with the GP EMP, including provision for fuel, oil, and chemical spills.	GP EMP Vessel Emergency procedures. GP pollution response arrangements		
All dredging vessels to have oil spill response kits on board. Relevant personnel to be trained in its use.	Sighted while on board Pers. com with Ship's Master		



Independent Audit Brief
GLOA Maintenance Dredging

Table 5: Detailed Audit Findings – Marine-based works (all areas) PDS

PDS Requirement	Evidence	Audit Findings and Comments	Compliance
7. Marine pests			
The TSHD <i>Tommy Norton</i> and CSD <i>Kalimna</i> are based at Lakes Entrance. Marine pest inspection / cleaning only if returning from operation outside Gippsland Lakes.	Tommy N AQIS inspection report (2017)		
All vessels to comply with <i>Protocol for Environmental Management – Domestic Ballast Water Management in Victorian State Waters</i>	Ship's procedures. Current Class Ballast Water Management certificate.		
All vessels to comply with <i>Australian Ballast Water Management Requirements</i> , AQIS.	Ship's procedures. Current Class Ballast Water Management certificate.		
8. Vessel anchoring			
Vessels to anchor or berth in accordance with the Harbour Master's instructions	Ships berthing procedures. Ships log for berthing records. Note: Ship does not normally anchor.		
9. Vessel bunkering			
All bunkering to take place in accordance with Harbour Master's instructions, ships procedures and at BIW facility.	Ship's procedures. GP permit issued to fuelling company		
10. Cetaceans – vessel maneuvering			
Before beginning dredging and dumping activities, check using binoculars, from a high observation platform on the vessel, for cetaceans (and pinnipeds) within the monitoring zone.	Cetacean SOP Ship's log sheets Pers. comms and observations while on board. Marine Fauna Observation Register.		



Independent Audit Brief
GLOA Maintenance Dredging

PDS Requirement	Evidence	Audit Findings and Comments	Compliance
If any cetaceans are sighted in the monitoring zone, dredging/dumping activities must not commence in the monitoring zone until 20 minutes after the last cetacean is observed to leave the monitoring zone or the vessel is to move to another area of the dredge/disposal site to maintain a minimum distance of 300 metres between the vessel and any cetacean identified above.	Marine Fauna Observation Register. Daily report.		
Monitoring zone means the area within 300 metres radius of the vessel.			
11. Cetacean sightings and log			
Personnel on board vessels are to report all sightings of cetaceans.	Marine Fauna Observation Register.		
A log of cetacean sightings and action taken to be kept for all vessels and operational work areas and recorded on dredge daily log sheets.	Marine Fauna Observation Register.		
This information to be summarised in annual GLOA performance report	GLOA annual performance report		
12. Heritage (marine based) – identification of potential relics			
If potential relics are identified during operational activities, the process described in Annexure 5 will be followed.	None found		
13. Traditional Owners			
GLaWAC engagement	N/A to EMP. Addressed in GLOA Stakeholder Engagement Plan		



Independent Audit Brief
GLOA Maintenance Dredging

Table 6: Detailed Audit Findings – Dredging and plume PDS

PDS Requirement	Evidence	Audit Findings and Comments	Compliance																								
14. Dredging																											
Dredging must remain within the identified dredging zones and will be confirmed by recorded GPS data.	Dredge Track plots	Note – colour of line indicates status of dredger operation, sailing, dredging, dumping. To confirm dredging Ship's log must also be inspected.																									
<u>Turbidity</u>																											
The overflow valve of the TSHD must be closed when the vessel is not engaged in dredging.	Operational procedures. Observation of vessel. Pers. com with Ship's Master																										
During the period of September to January (grayling migration period) plume caused by dredging activities must not exceed 25NTU, at a distance of 50m from the vessel, across the channel.	SEAMEC monitoring sheets																										
During the Grayling migration period - September to January the dredge will not operate in overflow mode between the training walls on a flood tide.	Operational procedures. Observation of vessel. Pers. com with Ship's Master																										
Recording of equipment activity on dredge log sheets will include the following information as a minimum:	Dredge log sheet Daily report																										
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 25%;">Equipment</th> <th style="width: 25%;">Time / Date / Weather</th> <th style="width: 25%;">Location / Co-ordinates</th> <th style="width: 25%;">Status</th> </tr> </thead> <tbody> <tr> <td>TSHD (contract dredge)</td> <td></td> <td>Management of sand from Sailing and placement of sand to</td> <td>Dredging / sailing / placement at DMG / maintenance</td> </tr> <tr> <td>CSD (GP dredge)</td> <td></td> <td>Management of sand from</td> <td>Dredging / sailing / east or west discharge point</td> </tr> <tr> <td>Other (sand shifters, bulldozer, etc.)</td> <td></td> <td>Management of sand from</td> <td>Reason for use of equipment other than dredge.</td> </tr> <tr> <td>DMG</td> <td></td> <td>N/A</td> <td>East / West</td> </tr> <tr> <td>DMG</td> <td></td> <td>N/A</td> <td>East / West</td> </tr> </tbody> </table>				Equipment	Time / Date / Weather	Location / Co-ordinates	Status	TSHD (contract dredge)		Management of sand from Sailing and placement of sand to	Dredging / sailing / placement at DMG / maintenance	CSD (GP dredge)		Management of sand from	Dredging / sailing / east or west discharge point	Other (sand shifters, bulldozer, etc.)		Management of sand from	Reason for use of equipment other than dredge.	DMG		N/A	East / West	DMG		N/A	East / West
Equipment	Time / Date / Weather	Location / Co-ordinates	Status																								
TSHD (contract dredge)		Management of sand from Sailing and placement of sand to	Dredging / sailing / placement at DMG / maintenance																								
CSD (GP dredge)		Management of sand from	Dredging / sailing / east or west discharge point																								
Other (sand shifters, bulldozer, etc.)		Management of sand from	Reason for use of equipment other than dredge.																								
DMG		N/A	East / West																								
DMG		N/A	East / West																								



Independent Audit Brief
GLOA Maintenance Dredging

Table 7: Detailed Audit Findings – Dredging schedule PDS

PDS Requirement	Evidence	Audit Findings and Comments	Compliance
15. Dredging schedule			
Dredging to take place in accordance with Table 10: Dredging Summary.	GLOA Annual Dredging Plan Final Survey		
No dredging within the Rigby Island Buffer zone between October and March	GLOA Annual Dredging Plan Track plots Daily report		
Dredging schedule to include: - Dredging technology. - Timing, duration and sequence of dredging and placement and use of sand.	GLOA Annual Dredging Plan		
16. Consideration of seasonal sensitivities			
Dredging activities planned with a particular awareness and regard for high recreational use periods (Easter, Summer holidays, long weekends) as set out in Table 11 – Key seasonal sensitivities and preferred seasons.	GLOA Annual Dredging Plan		



Independent Audit Brief
GLOA Maintenance Dredging

Table 8: Detailed Audit Findings – Dredged material management PDS

PDS Requirement	Evidence	Audit Findings and Comments	Compliance
17. Dredged material placement			
Dredged material must only be dumped within the Western and Eastern disposal sites defined by the MGA 94 coordinates in Table 2: Coordinates for Dredged Material Grounds for TSHD.	Track plots		
Dredged material must be placed along a different alignment for each disposal cycle.	Track plots		
Prior to placement, establish by GPS that the vessel is within one of the defined placement sites.	Track plots		
Dredging disposal locations to be recorded as per recording of equipment (refer to Table 7 – Dredging and plume PDS).	Track plots		
Volumes are to be calculated from dredge records and hydrographic survey data.	Daily Reports Hydrographic surveys		
18. Disposal site dissipation monitoring			
<p>DMGs - Hydrographic surveys will be undertaken on an annual basis.</p> <p>The results of hydrographic surveys will be included in the annual GLOA Performance Report.</p> <p>Changes in DMG profile are reported to AHO per IMO requirements and used to inform dredging plans.</p> <p>Near shore discharge – Documentation to include photographic records aerial or satellite imagery as required to monitor shoreline in vicinity of discharge (outfall) locations.</p>	<p>Survey results Imagery IMO reporting</p>		



Independent Audit Brief
GLOA Maintenance Dredging

Table 9: Detailed Audit Findings – External notification and reporting requirements

Reporting Requirement	Evidence	Audit Findings and Comments	Compliance
Pollution event or imminent environmental hazard (as defined in Environmental Auditor Guidelines for Conducting Environmental Audits, Publication 953.2, October 2007, EPA, Victoria)	Copy of relevant report		
EPA, DCCEEW, DEECA Immediate notification and report required.	Email, phone record, etc		
Project Delivery Standard			
DEECA, DCCEEW Notification within one 5 business day of verifying non-conformance with a PDS.	Email, phone record, etc		
TSHD program			
DCCEEW Make and retain records (which may comprise weekly plotting sheets or an extract of the ship's log certified by the vessel's captain) which must detail: a. the dates, times, and GPS co-ordinates of vessel movements for dumping activities b. the volume of dredged material (in-situ cubic metres) dumped and quantity in dry tonnes for the specified operational period, including the proportion that this amount represents of the total amount permitted under the permit for the dredging campaign	Daily reports, Track Plots, TSHD stats spreadsheet		
DCCEEW The names and relevant training and experience of the person(s) who undertook the marine species observation required under condition 11, the marine species observed within the monitoring zone for each vessel movement, including, for each sighting, the date, time, species (or nearest identification), location (GPS co-ordinates) and approximate distance of the marine species from the vessel , and the action taken to comply with condition 12.	Marine Fauna Observation Register		
DCCEEW Notify within 5 days of the date on which dumping activities have concluded.	Email, Annual Reports		
Annual GLOA performance report/			
DEECA, DCCEEW Within 90 days of completion of all dumping activities associated with a TSHD campaign.			
SDP annual monitoring report			
DCCEEW Report to the department by 31 January each year, including a final annual report on the day of the expiry of this permit or completion of all dumping activities under this permit, the information specified at Appendix 3 to this permit, in the format of Appendix 3 or as otherwise approved by the department .			
SDP hydrographic survey			
DCCEEW Provide a report on the bathymetry to the department within 2 months of the final bathymetric survey being undertaken.			
SDP hydrographic survey report			
DCCEEW For the bathymetric survey completed within one (1) month of completion of all dumping activities authorised under the SDP, provide a report within two (2) months including a chart showing the change in sea floor bathymetry as a result of dumping and include written commentary on the volumes of dumped material that appear to have been retained within the disposal site.			
Annual reporting and continuous improvement planning			
TACC, DCCEEW, DEECA Stakeholder awareness annually as a minimum, with outcome summary to DEECA & TACC members. TACC agenda prior to meetings and minutes following meetings detailing issues together with proposed actions.			



4.5 Reporting / Deliverables

Gippsland Ports require the following deliverables to complete the audit:

- Final Audit Plan (to be based on APPENDIX 2 – DRAFT Audit Plan)
- A draft audit report if required by the Audit Plan.
- A written final audit report covering:
 - Audit scope (refer to Section 3.1 Scope of Independent Audits)
 - Audit methodology
 - Audit findings
 - Recommendations for potential improvements

A suggested Table of Contents for the Final Audit Report is included at APPENDIX 1.

APPENDIX 1

Suggested Table of Contents for Independent Audit Report

Executive Summary

1. Introduction
 - 1.1 Background
 - 1.2 Scope of Independent Audit
 - 1.3 Outline of this Audit
2. Audit Methodology
 - 2.1 Standards applied
 - 2.2 Preparation for this Audit
 - 2.3 Report on Findings for this Audit
3. Audit Findings
 - 3.1 Summary of Findings
 - 3.2 Detailed Findings (incorporating evidence)
 - 3.3 Potential Improvements
4. Conclusion
5. Reference / Source Documents



APPENDIX 2 – DRAFT Audit Plan

DRAFT Audit Plan Context:

This DRAFT Audit Plan is provided as a basis for audit to be conducted by an external auditor. A final Audit Plan must be agreed between Gippsland Ports and the external auditor prior to site audit tasks being commenced.

DRAFT Audit Plan

1. Period of Audit
2. Request for documents
3. Site / vessel visit.
4. Inspection of Documents
5. Report Preparation

Auditor contact details	Name: Address: Email: Telephone (work): Telephone (mobile):
Gippsland Ports contact details	Name: Address: Email: Telephone (work): Telephone (mobile):
Location of Site Inspection and Preliminary Audit	Bullock Island, Lakes Entrance
Scope of Audit	GLOA EMP V5.1 (or most current version) compliance Additional relevant documents are: <ul style="list-style-type: none"> • MACA consent • EPBC referral decision • Sea Disposal Permit • Environmental Risk Register • GLOA Independent Audit Brief
Timing and period to be audited	Audit commencement November - December each year, with final dates known at completion as documentation and evidence is not available until after the TSHD has completed operation around mid-December.



Independent Audit Brief
GLOA Maintenance Dredging

6. Audit commencement meeting agenda

Introductions

- Key Auditor personnel
- Key Gippsland Ports personnel

Safety and induction requirements

Purpose of Audit - Scope and objectives

Audit plan – Procedures and methodology

Audit schedule

7. Audit documents from Gippsland Ports

It is not envisaged that any originals of documents will be removed from the site.

Wherever possible electronic copies will be provided

Additional documents and/or omitted documents will be made available to the auditor.

The documents provided will include (but are not limited to):

- Previous audits and compliance history
- Vessel SMS
- Evidence of past environmental performance (eg. inspections, complaints, submissions, community concerns relevant to activities)
- Gippsland Ports background (abbreviations, responsibilities)
- MACA consent and associated approved documents:
 - Environment Management Plan
 - Environmental Risk Assessment
- Sea Disposal Permit
- EPBC referral decision
- “evidence” cited including:
 - Hydrographic surveys
 - Daily Reports and Track Plots
 - Feedback Register
- Any other documents requested by the auditor



APPENDIX 3 – DRAFT Audit Checklists

1. On-Site Checklist

General Management	Comments
Has Gippsland Ports:	
Allocated responsibility for EMP implementation?	
Developed a system for managing relevant documents?	
Maintained a records system?	
Developed protocols for disseminating EMP compliance issues to Dredging and Operational staff?	
Maintained a complaints register?	
Maintained a risk / events register?	
Established a process to implement changes required to ensure incidents do not occur again?	

2. Documents Checklist

Documents Provided	Comments	Provided by
Operational		
Dredge Logs		
track plots		
Daily reports		
Tommy Norton Safety Management System (SMS)		
Tommy Norton Class Certificates		
Hydrographic surveys		
Approvals		
GLOA EMP/ERA/ERR		
Marine and Coastal Act consent		
Sea Disposal Permit		
EPBC referral decision		
EES decision		
Annual performance report/s		
Organisational		
GP Policy		
GP Risk Management		
Other documents (list)		