

# Compliance Audit Report

Quarantine Station, North Head

National Parks and Wildlife Services

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# Table of contents

<b>Executive Summary.....</b>	<b>4</b>
<b>1. Introduction.....</b>	<b>5</b>
<b>2. Audit Scope .....</b>	<b>5</b>
<b>3. Audit Activities .....</b>	<b>6</b>
3.1. Site Inspection.....	6
3.2. Document Review .....	6
3.3. Stakeholder Consultation .....	6
<b>4. Audit Findings .....</b>	<b>8</b>
4.1. Site Observations .....	8
4.1.1. General activities .....	8
4.1.2. Environmental observations .....	8
4.2. Review of Environmental Reports and Documents.....	9
4.2.1. Previous Audit 2011.....	9
4.2.2. Compliance Reports.....	9
4.2.3. Regulatory Summary .....	13
4.2.4. Monitoring reports .....	13
4.3. Non-conformances .....	15
4.3.1. Previous audit (2011).....	15
4.4. Assessment of Compliance with MCoA 228.....	17
5.1. Conclusions.....	19
5.2. Recommendations.....	19

# Executive Summary

SNC-Lavalin has been engaged by National Parks Wildlife Services (NPWS) to undertake an audit of Quarantine Station at North Head (Q Station). The audit is required under Ministers Condition of Approval (MCoA) 228 which requires a comprehensive audit to be completed every five years for the site.

To complete this audit SNC-Lavalin undertook a site inspection and reviewed relevant and available documents relating to the approval and to the ongoing management and monitoring of the site environmental aspects.

The inspection was undertaken on June 20th, with members from NPWS, Mawland and SNC-Lavalin present. The findings from the audit reveal that Q Station is operating in an environmentally responsible manner, and in general compliance with the Ministers Conditions of Approval. Of particular note are a range of voluntary environmental sustainability initiatives that have been implemented and the outstanding adaptive use of the site as a heritage and educational precinct.

Several self-reported non-compliances have been noted later in this report. These non-compliances relate to timeliness of reporting, vegetation clearing and a sewage overflow event into Sydney Harbour. Mitigation measures and actions to prevent recurrence have been identified.

Based on the site inspections and the documents reviewed by the auditors, the non-compliances did not result in significant environmental harm. The programs and systems implemented appear to be effective at managing environmental issues on the site.

# 1. Introduction

SNC-Lavalin has been engaged by National Parks and Wildlife Services (NPWS) to undertake an audit of the Quarantine Station development at North Head (Q Station). This audit addresses Ministers Conditions of Approval (MCoA) 228 which requires a comprehensive audit to be completed every five years. This audit is the third for the project and covers the years of operation between 2011 and 2018. The extension for the audit to include the additional year and a half to the EOFY 2018 has been requested by NPWS due to a delay in modifications to planning approvals. Previous audits were undertaken in 2007 and 2011.

Mawland and NPWS are co-proponents under the MCoA, however Mawland are the operator of the facility and run the day-to-day activities. The NSW Office of Environment and Heritage (OEH) is the parent organisation of NPWS and regulates matters relating to heritage, pollution, native vegetation, biodiversity and National Parks.

The audit was undertaken during the months of June and July 2018 with the draft report issued for consultation with key stakeholders on 22 August. The findings of the audit were discussed with the Quarantine Station Community Committee (QSCC) on November 14, 2018.

This report documents the findings of the audit and provides an assessment of compliance with the MCoA.

The North Head Quarantine Station covers 31 hectares, including 67 heritage buildings, in Sydney Harbour National Park. This site has cultural and historical significance as it was in operation as a Quarantine Station from 1828 until 1984. In 2006 this site was leased by the Minister of Environment (representing former Department of Environment and Climate Change and Water – DECCW now known as OEH) to Mawland for the construction and operation of a tourist facility “Q Station”, accommodating for conferences, weddings, school tours and overnight stays. Planning approval was granted in 2003 with NPWS and Mawland as co-proponents.

# 2. Audit Scope

The scope of this audit is to assess compliance with the MCoA that relate to the operation of Q Station between the years of 2011 and EOFY 2018. This audit has been undertaken in general accordance with ISO19011 as per MCoA 226. The standards ISO14010 and ISO14011 referred to in condition 226 have been withdrawn and replaced by ISO19011. Therefore, the audit process has been conducted in accordance with ISO19011. This audit is not an Environmental Management Systems audit in accordance with ISO14001 and is not intended as a routine reporting mechanism.

In accordance with MCoA 228 this audit shall address, but not be limited to:

- a) The environmental performance of the activity and its effects on the environment
- b) Compliance by the co-proponents with the approval condition
- c) The adequacy of the integrated monitoring program and EMP
- d) The adequacy of measures taken or proposed by the co-proponents to respond to issues arising from:
  - The integrated monitoring program
  - Consultations with the community
- e) Consideration of the key impact predictions made in the EIS and PAS using information from the integrated monitoring program
- f) The adequacy and functioning of the information management and GIS system (once in place – conditions 66-69); and
- g) Any other matters considered necessary by the DEC, Heritage Council and Waterways Authority or DIPNR.

### 3. Audit Activities

The key audit activities consisted of:

- **Audit Planning**
  - Review of previous audit
  - Identification of key audit issues
  - Preparation of an audit checklist
- **Conduct Site Audit**
  - Site inspection of key buildings and infrastructure as well as environmentally sensitive areas around the site
  - Discussion with key personnel
  - Undertake document review
  - Photographically record notable visual observations (refer to Appendix A)
- **Consultation with Stakeholders**
  - Issue draft report to relevant agencies and stakeholders for review and comment
- **Reporting**
  - Prepare draft report and finalise following receipt of comments from relevant agencies.

#### 3.1. Site Inspection

A site inspection was undertaken on 20<sup>th</sup> June 2018. The scope of the inspection included the following precincts:

- The Wharf and restaurants
- Former First Class
- Former Second Class
- Former Third Class
- General site areas including beach, walkways, roadways, paved and grassed areas

Observations made during the site inspection are reported in Section 4.1 below.

#### 3.2. Document Review

Documents reviewed as part of the audit included (but was not limited to) the following:

- Minister's Conditions of Planning Approval
- Environmental Impact Statement
- Environmental Monitoring reports, including Long-Nosed Bandicoot and Little Penguin data (2011-2017)
- Annual Environmental Reports 2013-14 and 2015-17
- NPWS compliance reports
- QSCC meeting minutes
- Complaints register
- Q Station records, including training, induction, education programs etc

Appendix B provides a full register of the documents provided by Mawland and NPWS.

#### 3.3. Stakeholder Consultation

The draft audit report was issued to the following stakeholders for comment:

- NSW Department of Primary Industries (Fisheries)
- NSW Office of Environment and Heritage –Heritage Division
- NSW Roads and Maritime (Maritime)
- NSW Department of Planning and Environment (DPE)

- Quarantine Station Community Committee (QSCC).

Comments were received from DPE, DPI and the QSCC. The audit findings were discussed with the QSCC at the regular meeting on 14 November 2018. No major issues were identified by the QSCC.

Issues raised have been addressed in this final audit report. A summary of the consultation process and comments is provided in Appendix C.

## 4. Audit Findings

### 4.1. Site Observations

#### 4.1.1. General activities

At the time of the audit, the site was being used for the following activities:

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

The activities being conducted result in a high number of movements around the site, due to the tours and guests going from one place to another. Q Station also allows members of the public to visit and use the public facilities of the site.

Weather during the audit was overcast and fine, although it was noted that the site had experienced heavy rainfall the previous evening.

#### 4.1.2. Environmental observations

The following observations were made during the audit:

- The surrounding environment including Quarantine Beach, adjacent bushland and grassed areas showed evidence that weeds are being managed and were free of littering
- Accessibility access arrangement in place for less abled patrons including:
  - Disabled ramp access into some rooms
  - Some hotel bathrooms fitted as open plan with disabled fittings, lower door handles etc for mobility impaired patrons
  - The option for mobility impaired patrons to use their own cars on site (accompanied by a Q Station staff member)
- There was no visible signs of pollution, contamination, odour or littering
- There were limited chemical substances kept on site, including commercial cleaning products. Commercial cleaning products were biodegradable and were stored under cover in a lockable shed. There was no bulk fuel stored on site
- Waste recycling bins are available however the placement of bins and bin signage could be improved to make the bins more accessible adjacent to the beach and in public areas
- Road side signage alerting road users of local fauna is in place
- No observations of rabbits or foxes
- Fenced beach area, with access prohibited from sunset to sunrise – to provide protection to the little penguin colony
- Recycled water used for grey water, where heritage fittings allowed
- Buildings kept in their original conditions and in keeping with heritage values; and changes made to the original conditions e.g. ensuite bathrooms, are reversible
- The site is connected to the sewerage. There was no odour or visible leakage of sewage to Quarantine Beach
- Vehicle use on site is restricted to shuttle buses, operational vehicles and accompanied vehicles of disabled patrons.
- Sustainable initiatives (see images in Appendix A) including:
  - Providing hotel guests the option to reuse their towels, rather than have a replacement towel each day (water and energy saving)
  - Providing discounts on hot beverages when using a keep cup
  - Offering a free coffee for visitors who collect rubbish
  - Bike hire scheme at entry to site



- Sustainable transport plan including shuttle bus and ferry
- Prohibiting single use plastic straws
- Recycling unused soap bars for use in developing nations (soap aid)
- Recycled furniture used through development
- Use of recycled materials by the resident artist
- Hotel rooms are not air-conditioned, instead they are cooled by airflow and ceiling fans

Further hospitality specific sustainability training courses have been initiated for all relevant line staff including

- Participate in Environmentally Sustainable Work Practices
- Implement and Monitor Environmentally Sustainable Work Practices

The implementation and success of the above mentioned should be followed up in the next audit.

## 4.2. Review of Environmental Reports and Documents

As part of the audit, a range of relevant environmental reports were reviewed. The key issues are summarised below.

### 4.2.1. Previous Audit 2011

The previous audit was undertaken in 2011 for the years of 2006-2011. This report included a scoring system which provided a general guide to the performance of the site in terms of environmental compliance, management and performance. The 2011 audit achieved a score of 96%, with a 4% increase from the 2007 audit undertaken for the site.

This report noted that the site was in good condition and was successful in achieving the following environmental and cultural objectives:

- The natural landscape of the site has been restored and managed consistently with the management of surrounding areas of the Sydney Harbour National Park
- The historic buildings have been stabilised and restored
- Sensitive adaptations have been made to the historic buildings to allow the operation of a successful modern hotel and heritage tourism operation which focuses on providing guests with an experience based on the history and environmental values of the site
- Conservation and interpretive work has been undertaken for the preservation and display of the moveable heritage of the site.

The observations made during the site visit on 20<sup>th</sup> June 2018 were consistent with the findings of the 2011 audit.

The 2011 audit noted the transition from the construction phase to the operation phase was a point of concern, with further adjustments to the environmental documentation required. This has been implemented progressively, for example with the introduction of the vegetation works procedure, however can be further improved.

### 4.2.2. Compliance Reports

The tables presented in the report below are to assess the performance of the site against the MCoA. These tables have been separated into self-reported non-conformances, monitoring results, previous audit findings, assessment of compliance against audit MCoA and recommendations. These tables detail additional information on reported and potential non-conformances.

Table 1 details the most serious and/ or reoccurring compliance matters.

**Table 1 Self-Reported Non Compliances**

Year	Non-compliance/Findings	Condition	Date	Location	Actions to Mitigate Impacts	Actions taken and/or proposed to prevent recurrence
2013-14	Walking track cleared through bushland between buildings A18 and S1 without approval.	90-94	July 2013	Between buildings A18 and S1 and of Building P22	Verbal discussions were held between Mawland and OEH. OEH advised Mawland to undertake a treatment proposal for the track prior to any further works occurring. This work was later assessed by OEH and no further work was required.	Consult with OEH and submit required documentation prior to approval for proposed vegetation removal.  Provide refresher training to staff, maintenance and weeding contractor(s) to prevent recurrence.
	Sewage overflow event at Old Mans Hat due to a pump failure and associated alarm at the main sewer pumping station.	106(i)	September 2013	Near Old Man's Hat	There were no observed residual impacts (visual or odour).  Mawland provided a sewage overflow event incident report and improvement proposal. OEH reported the incident to the EPA.  The pumping station has been upgraded to include a new floating mono pump in the main sewage pumping station in addition to the new submersible pumps. Telemetry warning services for the new pumping stations have also been installed.  There have been no further reported sewage overflow incidents.	Ongoing monitoring and maintenance of sewage facilities to ensure risk of recurrence is minimised. Implement incident reporting protocol for environmental harm.  The co-proponents are now confident that the new installations and the ongoing investigations will substantially reduce the risk of sewage overflow events arising from pump failure.
	Clearing of native vegetation within the First-Class Precinct without notifying OEH prior to the clearing work being undertaken.  Approval for vegetation clearing and thinning for hazard reduction purposes was granted through an REF in 2010. There was no additional vegetation cleared other than that required for hazard reduction purposes and approved by the REF. Approval	90-94	May 2014	First Class Precinct	OEH issued Mawland with a Compliance Investigation document (no. 2014/002), with which Mawland verbally responded to solve the incident.  No further remedial work was required as it was ascertained that this work was in the scope of a bushfire hazard reduction.	Consult with OEH and submit required documentation prior to approval for proposed vegetation removal.  Provide refresher training to staff, maintenance and weeding contractor(s) to prevent recurrence.

Year	Non-compliance/Findings	Condition	Date	Location	Actions to Mitigate Impacts	Actions taken and/or proposed to prevent recurrence
	of this REF was conditional on various conditions being fulfilled prior to and during execution of the works. Mawland did not notify OEH prior to the clearing work being undertaken.					
	Clearing of native vegetation to create tracks within the Third-Class Precinct	90-94	May 2014	Linking the Second Cemetery with the former Bridle Path at the back of Building P22 and the footings of the former building P21	New track entrances closed and rehabilitation plan provided to OEH for regeneration of vegetation on the track. OEH issued Mawland with a Compliance Investigation document (no. 2014/001), with which Mawland verbally responded to solve the incident. The track is no longer used.	Consult with OEH and submit required documentation prior to approval for proposed vegetation removal.  Provide refresher training to staff, maintenance and weeding contractor(s) to prevent recurrence.
	Audio speakers were installed in the outdoor dining area of the Boilerhouse. Restaurant to provide ambient dining music for restaurant diners.	201	May-June 2010 ongoing	Boilerhouse Restaurant	The proponent has sought a modification to allow audio speakers to be installed and utilised. This MCoA was changed in a modification (25/5/18) to allow ambient dining music in the outdoor area with seasonal restrictions in place to avoid impacts to the adjacent little penguin colony.	Ongoing noise monitoring and enforcement of seasonal restrictions as stipulated in the MCoA modification.
2015-17	Unauthorised clearing near Little Penguin Critical Habitat adjacent to the Boiler House Restaurant	174-176	December 2015	Little Penguin habitat adjacent the Boilerhouse Restaurant	The unauthorised clearing involved the removal of a weed ( <i>Green Cestrum</i> ). A written warning was provided to Mawland by OEH along with a recent map of the critical habitat area. Advice was also provided by OEH that both weeds and native plants provide essential cover and are considered as critical habitat for little penguins.	OEH will take steps to improve the definition of the Critical Habitat Areas on the ground and in the gazettal notice.  Consult with OEH and submit required documentation prior to approval for proposed vegetation removal.  Provide refresher training to staff, maintenance and weeding contractor(s) to prevent recurrence.

Year	Non-compliance/Findings	Condition	Date	Location	Actions to Mitigate Impacts	Actions taken and/or proposed to prevent recurrence
	Delayed Commencement of the Environmental Audit (CoA 226-233)	226-233	November 2016	N/A	The 2011-2016 Audit has been expanded to include the years 2017 and up until EOFY 2018 (i.e. although the commencement date was delayed, the scope of the audit has been increased. There were no observed environmental impacts as a result of the delay in the audit.	Update operating diaries of key personnel to ensure appropriate timeframes and resources are allocated to ensure timely commencement and completion of the next audit.
	On P14-P16, part of the veranda was enclosed for a storage area – unapproved Construction work	35-39	April 2016	Asiatic Precinct	The structure was temporary and was removed. There were no ongoing impacts.	Work in accordance with the existing OEH/NPWS “Construction Assessment Procedures” prior to, during and at completion of new works on site.  Provide refresher training to staff as required.
	Colourbond fence and shed was erected in Carpark 5 – unapproved Construction work	35-39	December 2015	Car Park 5	The structure is temporary and can be removed.	Work in accordance with the existing OEH/NPWS “Construction Assessment Procedures” prior to, during and at completion of new works on site.  Provide refresher training to staff and contractors as required.

### 4.2.3. Regulatory Summary

In summary:

- There were no Show Cause Letters, Penalty Infringement Notices, Prosecutions or Improvement Notices relating to the site issued by a regulatory authority
- There were two caution letters issued by OEH for:
  - Unauthorised vegetation clearing (for both First Class and Third Class precincts) (refer above)
  - Unauthorised clearing near Little Penguin Critical Habitat (refer above).

OEH were formally notified of the sewage incident overflow however did not take any regulatory action.

### 4.2.4. Monitoring reports

Quarterly and annual integrated monitoring and adaptive management system reports were reviewed. The population numbers of Long-nosed bandicoot, foxes, rabbits and Little Penguins over the audit period (2011-2018) are summarised in the Table 2. Assessment of the existing monitoring programs is required by MCoA 228 c).

**Table 2 Monitoring reports**

Aspect	2011/12 population	2017/18 population	Comments
<b>Long-nosed bandicoot</b>	13	15	Number of animals captured remains high but has dropped from an all-time high number in November 2016.
<b>Little Penguin</b>			
<b>Breeding pairs</b>	17	11	There was a fox predation event in 2015 that resulted in the death of 27 penguins. Quarantine Beach was the least affected with only one death. This resulted in a decrease in population in the area. The population is still recovering from this event but is expected to increase. Since the attack there has been greater emphasis on integrated fox control including annual planned and reactive soft jaw trapping in addition to ongoing poison baiting and fox activity monitoring.
<b>Active nests</b>	19	14	
<b>Eggs</b>	44	35	
<b>Fledging's</b>	33	24	
<b>Fox</b>	0	0	Within acceptable range of 0-1
<b>Rabbit</b>	2011 Q1: 48 2011 Q3: 26	2017 Q1: 33 2017 Q3: No Monitoring undertaken.	The acceptable range is 21.6-26.4. This monitoring data highlights that the rabbit numbers are recorded as not being within the acceptable range for Q1 2011 and Q1 2017. Recommendations are made in Section 5.2.
<b>Seagrass</b>	No data available.	Within 25-45% coverage.	The restrictions on activity and anchoring in the bay have allowed for two main areas of surviving established seagrass beds either side of the wharf. Data for seagrass has been recorded through the Integrated Monitoring and Adaptive Management System for 2015-2017 and has consistently met the requirements of 25-45% coverage. Several buoys delineate a penguin habitat area, which automatically protects the seagrass, however there

Aspect	2011/12 population	2017/18 population	Comments
			<p>is no designated protection for the seagrass. Similarly, outside of the penguin habitat markers there is no protection for the seagrass and it only exists in small clumps (Eco Divers 2018).</p> <p>In any case the day to day operations of the Q station do not have any material impact on the seagrasses. Any impacts would be due to recreational boaters anchoring offshore outside the exclusion zone.</p>

### 4.3. Non-conformances

Commencement of the 2015 AER was delayed due to administration issues surrounding the consideration of a modification to the MCoA. It was advised by Mawland that reporting was put on hold during this time to avoid later amendments due to the outcome of the modification application.

The Annual Environmental Reports identified self-reported non-conformances. The following details were reported for 2013-14:

- 1.8% of conditions were behind the approved schedule or non-compliant. Most were minor and/ or readily resolved by Mawland or OEH. This includes the following:
  - Achievement of water transport ferry targets
- The completion status of 4.2% of the conditions was unknown and focused mainly on Access strategy review, and the Interpretation and Infrastructure Control plan review.

The following details were reported for 2015-17:

- 2.1 % of conditions were behind the approved schedule or non-compliant. Most of the compliance inquiries were minor or temporary matters that were readily resolved by the co-proponents. These include the following:
  - Achievement of water transport ferry targets
  - Management of amplified music and noise
  - Erosion under building P11
  - Broken door on the Glass house
  - Trenching between S16 and S5
  - New Stairs S1
  - New stone edging
  - Harbour edge bushland between P1 – P9
  - Movement of state drains and historic markers to prevent further damage
- The completion status of 1.1% of the Conditions of Approval was unknown.

The audit did not identify any non-conformances in addition to those that have been identified above.

#### 4.3.1. Previous audit (2011)

The status of recommendations from the previous audit is provided in Table 3 below.

**Table 3 Previous audit findings**

Recommendation	Status	2018 Audit Comment
Continue to explore options to increase the proportion of visitors accessing the site by water.	On-going	The Eco-hopper ferry stops directly at the Quarantine Wharf several times a day, 7 days a week. The use of this mode of transport is advertised on the Q Station website and throughout the site. The primary mode of transport is by private vehicle with over 75% of people travelling by car (GTA 2017).
It is recommended that continued efforts to be made to facilitate and promote the use of public transport to the site through visitor information, and to develop additional water transport options where feasible.	On-going	A bus service from Manly Wharf operates and runs directly to Q Station. The Eco hopper ferry also runs from Circular Quay start to the Quarantine Wharf. Further emphasis should be placed on advertising the free shuttle service from Q Station to Manly Wharf.

Recommendation	Status	2018 Audit Comment
It is recommended that the shuttle bus service to Manly continue to be promoted to assist in reducing car traffic to the site.	On-going	<p>This service is still currently running, and guests staying at the venue are notified when booking, however it is not advertised as a service on the website.</p> <p>Further emphasis should be placed on advertising the free shuttle service from Q Station to Manly Wharf.</p>

Mawland have advised that many visitors prefer the flexibility of arriving by their own vehicle. Starting from late 2018 charges for parking will apply and this may help to encourage the use of public transport, via both the bus and ferry service.



## 4.4. Assessment of Compliance with MCoA 228

As required by MCoA, an assessment of compliance with the conditions of MCoA is provided in Table 4 below.

**Table 4 Assessment of MCoA 228 Requirements**

MCoA 228 Requirement	Conclusion
a) The environmental performance of the activity and its effects on the environment;	The Q Station is being operated in a very sensitive environmental setting adjacent to threatened populations of little penguin and long-nosed bandicoots, sea grasses, threatened plants (sunshine wattle and Camfield's stringybark), Threatened Ecological Community Eastern Suburbs Banksia Scrub (ESBS) and Sydney Harbour National Park. The heritage values of the precinct have been preserved and enhanced. Interpretive displays are outstanding. Sustainability initiatives have been implemented that inform and educate visitors to the precinct while reducing environmental impacts. The overall environmental performance of the activity is very good with minimal impacts to the local environment. There have been some impacts due to non-conformances however the impacts are not significant.
b) Compliance by the co-proponents with the approval conditions;	The co-proponents have implemented a range of management programs, compliance tracking and reporting systems to ensure a very high level of compliance with the approval conditions. There are some self reported non conformances and these are reported above with corrective actions. Further recommendations are made below.
c) The adequacy of the integrated monitoring program and EMP	Both the integrated monitoring program and the EMP appear to be effective in achieving the positive environmental outcomes as noted above. However, the IMS appears to be highly detailed and overly complicated and could be simplified so that the system is more streamlined and focused. The EMP consists of a series of plans, procedures and programs and could be consolidated into one central document for simplicity.
d) The adequacy of measures taken or proposed by the co-proponents to respond to issues arising from: • The integrated monitoring program; and • Consultations with the community	The measures taken or proposed by the co-proponents to respond to issues arising from the IMS and consultations with the community are deemed to be adequate. Further recommendations aimed at ensuring continual improvement are included as part of this audit.
e) Consideration of the key impact predictions made in the EIS and PAS using information from the integrated monitoring program	The operation of the site adequately addresses the key impacts outlined in the EIA.
f) The adequacy and functioning of the information management and GIS system (once in place – conditions 66)-69); and	The Information management and GIS system was reviewed in 2011. It is recommended a further and detailed review is undertaken to determine if any refinements or improvements can be made.

MCoA 228 Requirement	Conclusion
g) Any other matters considered necessary by the DEC, Heritage Council and Waterways Authority or DIPNR	The audit report was issued to relevant stakeholders for comment. Comments have been addressed and incorporated into the report.

## 5. Conclusions and Recommendations

### 5.1. Conclusions

The following conclusions are made:

- The co-proponents Mawland and OEH are operating Q Station in an environmentally responsible manner, and in general accordance with the MCoA
- Mawland have implemented a number of sustainability initiatives which is commendable. The overall environmental performance of Q Station is very good
- The heritage values of the Q Station have been maintained and enhanced. The interpretive displays are outstanding
- The operation of Q Station does not appear to have a measurable impact on the local populations of bandicoots and penguin populations
- NPWS management programs of pest species (foxes and rabbits) appear to be effective, although it is noted that programs cover a broader area than Q Station
- During the audit period, there were several self reported incidents relating to unauthorised vegetation clearing and unauthorised works. Although management protocols are in place it is recommended that these refresher training to all relevant staff and contractors is provided to ensure compliance with the protocol
- Site environmental management protocols are in place and are comprehensive, there is an opportunity to consolidate the protocols into one central document.

### 5.2. Recommendations

Audit recommendations are presented in Table 5 below:

**Table 5 Recommendations**

Subject	Recommendation
Unauthorised Vegetation Clearing.	Consult with OEH and submit required documentation prior to approval for proposed vegetation removal. Provide refresher training to staff, maintenance and weeding contractor(s) to prevent recurrence.
New Works	Work in accordance with the existing OEH/NPWS "Construction Assessment Procedures" prior to, during and at completion of new works on site. Provide refresher training to staff and maintenance contractors as required to prevent recurrence.
Opportunity to increase trips by sustainable forms of transport and reduce car usage	Explore further promotional opportunities of sustainable transport options for visitors to the site. This includes the free shuttle bus and the ferry Services from Manly Wharf. Some opportunities may include the website and the provision of traveller information to day visitors and tour groups.
Waste Management – Bin placement around the site could be improved so bins are more visually accessible to patrons and they are better informed of recycling options	The placement of bins (and signage) is reviewed and improved as appropriate.

Subject	Recommendation
Sewage Spillage – notification to authorities and at risk persons	The incident notification protocol should be regularly reviewed and updated, and ensure that it is implemented for incidents that “cause or threaten environmental harm”. In the event of a sewage spill into Sydney Harbour, the EPA, Council and Department of Health should be notified “Immediately and without delay”. Recreational users of the harbour should be notified immediately to ensure their safety and so that evacuation plans can be implemented in the event of an incident.
Seagrasses – threat of recreational vessel anchoring from dropping or setting of the anchor	Although not the responsibility of Mawland, it is recommended that the mooring exclusion zone at Quarantine Beach is extended.
Pest abatement programs	Ongoing implementation (review and continual improvement) of pest abatement programs to ensure fox and rabbit numbers are within acceptable range.
Environmental Management Plan	The EMP consists of a series of documents and procedures. It is recommended these are consolidated to form one consolidated set of environmental operating procedures.
Environmental Reporting and Audit Timeframes	Ensure reporting dates are documented in diaries of key operational staff to ensure adequate time is allocated to prepare and submit key environmental reports and audits.
Incompletion Status of Conditions	Review conditions where unknown completion has been achieved and close out any residual actions.

# Appendix A – Site Photos



Figure 1 Bin placement behind building (© 2018 SNC-Lavalin)



Figure 2 Sustainability initiative - free/ discounted coffee (© 2018 SNC-Lavalin)





Figure 3 Fence to Beach (© 2018 SNC-Lavalin)



Figure 4 Cleaning storage facility (© 2018 SNC-Lavalin)









Figure 7 Sustainability Initiative found in guests bathrooms (© 2018 SNC-Lavalin)

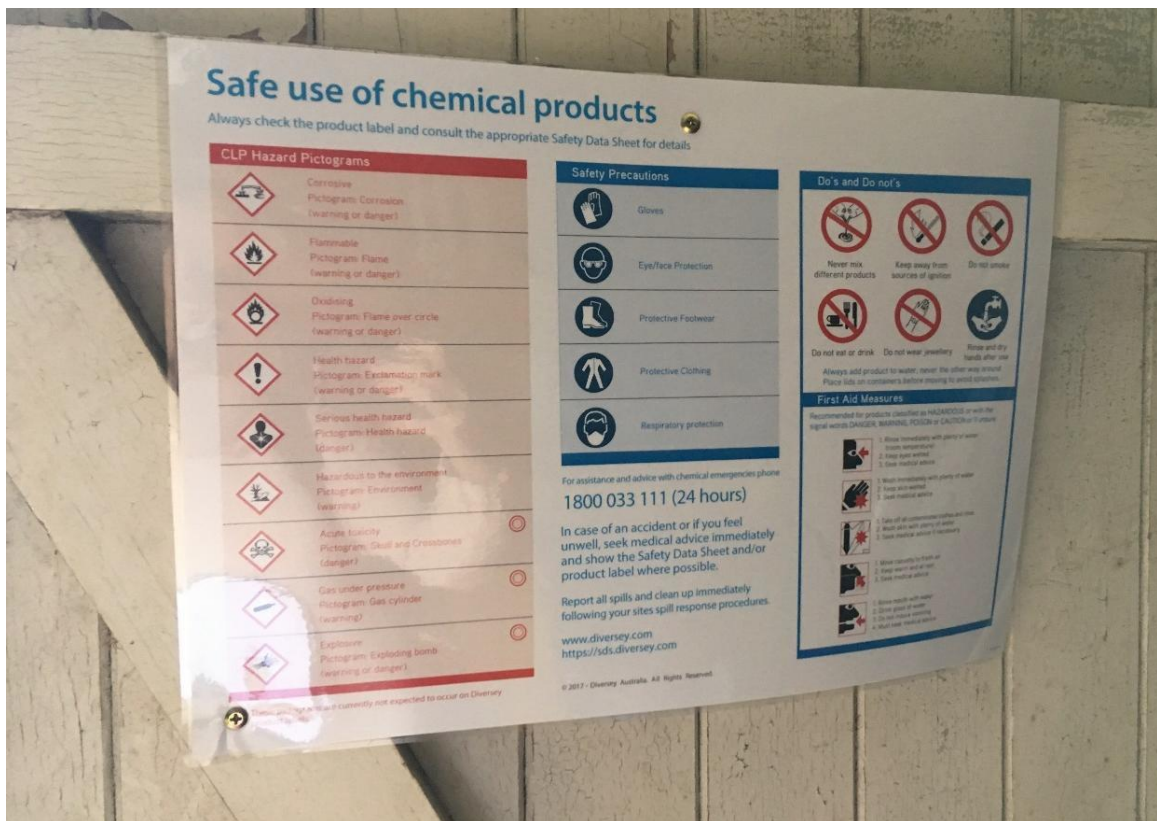


Figure 8 Chemical safety sheet hanging within cleaning storage facility (© 2018 SNC-Lavalin)



**Figure 9 Bus stop serviced by the shuttle (© 2018 SNC-Lavalin)**



**Figure 10 Rain water tank (© 2018 SNC-Lavalin)**





**Figure 11 Roadside Bandicoot warning signs (© 2018 SNC-Lavalin)**





**Figure 12 Roadside Bandicoot warning signs (© 2018 SNC-Lavalin)**

## Appendix B. Documents Register

Q-Station Document Register		
	Document Name	Date (written)
1	Sampling and Asbestos Strategy for the conservation and adaptive re-use of the Quarantine Station	October, 2005
2	Compliance Certification Tracker	27-June-2018
3	Food Safety Supervisor Certificate - Alison Langley	27-June-2018
4	Food Safety State of Attainment - Alison Langley	27-June-2018
5	Food Safety Supervisor Certificate - James Green	27-June-2018
6	Kids in quarantine - Experience Host Manual	Updated 2018
7	Report - Asbestos Survey - Q Station, Manly	26-October-2017
8	IMAMS Report Jan - Dec 2015	N/A
9	IMAMS Report Jan - Dec 2016	
10	IMAMS Report Jan - Dec 2017	
11	IMAMS Quarterly and Annual Report 2015	
12	IMAMS Quarterly and Annual Report 2016	
13	IMAMS Quarterly and Annual Report 2017	
14	IMAMS 2015_2016_2017 Appendices	
15	Mawland Annual Sustainability Report 2013 - 2014 (with NPWS Section)	
16	Mawland Annual Sustainability Report 2015 - 2017 (with NPWS Section)	
17	P21/23 Original Approval - pre construction variations	26-March-2012
18	Q Station Asbestos Register Commencing Jan 2012	30-October-2017
19	Q Station Lease Cover	N/A
20	Accorhotels' Environmental Footprint	Apr-2016
21	Responsible guests are looking for sustainable hotels	Apr-2016
22	Accorhotels: Sustainability initiatives contribute to guest satisfaction and business performance	May-2015
23	90 Day Induction Book	N/A
24	Duty Logs Incident report	16-February-2018
25	Emergency & Crisis Management Manual	Aug-2016
26	Emergency Procedure	Aug-2015
27	Evacuation Diagram	N/A
28	Fire, First Aid Emergency Training, Driving induction Trackers	
29	HEMSAFE Incident report overview - 2015 to 2018	
30	Q Station - Installation Safety Management Plan	17-November-2017
31	Q Station - Policies & Procedures Employee Handbook	Aug-2015
32	Planet 21 Check List - Sustainability Actions	N/A
33	Plastic Straw Free Hotel #switchthestrw	N/A
34	Quarantine Station Site Wide Plan Review 2011	Jan-2012
35	Audit Qstation Email (Suzanne Stanton - 24/04/2018)	24-April-2018
36	Email: Qstation Env Audit #5 (Suzanne Stanton)	20-June-2018
37	QS Site Visit and Dead Possum - 28/March/2018	28-March-2018
38	Quarantine Station Community Committee - Meeting 60 minutes	09-March-2017
39	Email: North Head Manly - Music Festival (Suzanne Stanton)	20-November-2017
40	Email: Quarantine Station, Manly - Environmental Reports (Suzanne Stanton)	N/A
41	Tweets - Kookaburras in Email: Issue - Penguins & Kookaburras	13-October-2016
42	Email: Rebuttal article on Kookkaburra on this mornings Manly Daily (Q Station Sydney GM1)	07-October-2016
43	Email: SMH Article (Suzanne Stanton)	06-October-2016
44	Email: Kookaburras (Suzanne Stanton)	05-October-2016
45	Email: Port Jackson Sharks (Peter Hay)	01-September-2016
46	Email: Gates at Quarantine Beach (Max Player)	22-July-2016
47	Images of Beach Area - Front of Boilerhouse (From email Zac Hope)	04-July-2016

Q-Station Document Register		
	Document Name	Date (written)
48	Email: No smoking in National Parks (Max Player)	19-May-2016
49	Email: Quarantine Station Annual Monitoring Report 2015 - request for data (Suzanne Stanton)	19-April-2016
50	Email: QS Asiatic Verandah Infill (Max Player)	19-April-2016
51	NPWS Dead penguin sign	05-April-2016
52	NPWS Fox sighting sign	05-April-2016
53	NPWS Fox DL	05-April-2016
54	OEH response	11-March-2016
55	Reponses to Notice to Provide Information/Records - Qstation North Head Manly-Mawland	09-March-2016
56	Email: Confetti Policy (Bethany Appel)	14-March-2016
57	Telegraph article about Salmonelle outbreaks in the community linked to bandicoot droppings	27-February-2015
58	Email: Trip accidents on site Q-Station (Suzanne Stanton)	13-February-2015
59	Email: P27 and alleged "road widening" Q Station (Suzanne Stanton)	21-October-2014
60	North Head Quarantine Station Building Maintenance Program	N/A
61	070228 Emergency Response and Management procedures - Mawland Quarantine Station	
62	060720 Evacuation and Emergency procedures - Mawland	
63	Transcation details - supply of containers, removal and disposal	26-May-2018
64	Tax invoice - Q station	03-April-2018
65	Food premises assessment report	16-November-2017
66	Supplementary inspection note for Food premises assessment report	16-November-2017
67	Food premises assessment report	29-November-2017
68	Key liquor licence detail	15-November-2016
69	Renewal Interim certificate	31-May-2018
70	Qs certificate of title search - land and property information NSW	07-March-2013
71	SKAL International Sustainable Tourism Awards 2015	N/A
72	Paul Davies - Supporting reference for NSW Green Globe Award for Excellence	N/A
73	Letter from Office of Environment & Heritage - NSW Green Globe Award	30-June-2015
74	NSW Green Globe Awards 2015 Heritage Buildings - Short form	N/A
75	Qstation Submission Interiors	
76	NSW Tourism Awards 2015 - Category 6 - Heritage and Cultural Tourism	
77	Show Video - Suzanne Stanton	
78	Qstation - Sustainability	
79	Determination of Modification Request for Quarantine Station, Manly	31-May-2018
80	Modification of Minister's Approval	25-May-2018
81	NSW Planning & Environment - Assessment Report	N/A
82	Summary of School & Vacation Care visits for Ed Programs 2016 - 2017	N/A
83	The History and Archaeology of Quarantine Linkage Project	30-January-2018
84	Lecture series	N/A
85	NSW Tourism Awards 2014 - Category 21 - Unique Accommodation	N/A
86	Press release - Artist in Residence	12-March-2018
87	Risk Assessment and Management Plan	02-November-2017
88	Application Under S65A of the NSW Hertiage Act to modify approval, North Head Quarantine Station for reconstruction of buildings P21 and P23	14-February-2017
89	Service Inspection Report from Flick Anticimex Location	13-February-2018
90	Email: Qstation Env Audit - Indigenous Experiences (Suzanne Stanton)	27-June-2018
91	Security and Noise Management Plan	2018
92	Quarantine Station Story - Experience Host Manual 2 hour site walk	May/2011
93	Wharf Wander - Guide Manual	Jan-2009

Q-Station Document Register		
	Document Name	Date (written)
94	Q Station Compliance Audit - Document Info Request	N/A
95	Quarantine Station Site Wide Plan Review 2011 - North Head Aboriginal Site Management Report	Jan-2012
96	Letter of recommendation from Sydney Quarantine Station	27-January-2015
97	Julia Christine Gwenyth Morgan Resume	N/A
98	Ron Edgar CV	N/A
99	Email: Qstation - Construction of Buildings P21 and P23 - Change of heritage advisor (Verena Mauldon)	12-December-2017
100	Paul Davies - ARAIA - Chartered Architect CV	N/A
101	Email: Qstation - Planting axial street (Suzanne Stanton)	03-December-2014
102	Vegetation works procedures within the North Head Quarantine Station Lease Area	N/A
103	Vegetation works notification form A	
104	Vegetation works notification form B	
105	Restoration and Rehabilitation Grant Program Application Form	
106	QS restoration and rehabilitaiton grant 2014	
107	QS Site Plan	
108	Image of entire site	
109	Image of vegetation on site	
110	Q Station Monitoring and Reporting Scheme	
111	Re	
112	Explanation of modifications to the original IMAMS scheme for Qstation monitoring	
113	Assembly area for Boxing Day Event	
114	Emergency Response Chart	
115	Approval under S65A of the NSW Heritage Act to modify approval - shade umbrellas	02-March-2017
116	Eco divers - volunteer marine conservation organisation - Manly NSW	N/A
117	Extra Covenant for all QS contracts Lease	N/A
118	Compliance with consent conditions S60 approval under the Heritage Act 1977	20-April-2017
119	QS Site Plan	N/A
120	Email: Quarantine station environmental audit (Suzanne Stanton)	20-June-2018
121	Email: Qstation Env Audit #6 (Suzanne Stanton)	20-June-2018
122	Qstation human resources	19-June-2018
123	The Search for better health - Experience host manual	May-2010
124	Quarantine Station Site Study - Host Manual	Aug-2014
125	EIA Modification	N/A
126	EIS Folder - EIS_North Head QuarantineStation_Vol1	N/A
127	Predator and Pest Control Plan	Oct-08
128	Predator and pest Plan Review 2011	29/11/2011 - 4/12/2012
129	Regional pest Management Strategy 2012-17	August 2013
130	Boilerhouse Restaurant Area Little Penguin Critical Habitat Preliminary Mapping	August 2016
131	Site management compliance summary 13-14	21/6/2017
132	NH Burn Q Station Nth SIS Skelton 2014	May 2014
133	Little Penguin IAP	27 June 2015
134	Penguin Protection Plan Sept 2015	September 2015
135	Predator and Pest Control Plan	Oct-08
136	Predator and pest Plan Review 2011	29/11/2011 - 4/12/2012
137	Regional pest Management Strategy 2012-17	August 2013
138	Penguin Warden Guide for Quarantine Station	N/A
139	Manly Little Penguin Recovery Program 2011-12 Monitoring Report	May 2012
140	Manly Little Penguin Recovery Program 2016-17 Monitoring Report	April 2017



Q-Station Document Register		
	Document Name	Date (written)
141	Penguin Action Plan February 2011	February 2011
142	Bandicoot Mortality Register 2011-2017	N/A
143	Long-nosed Bandicoot Monitoring Report Whole of Headland May 2016 Census	July 2016
144	North Head Long-nosed Bandicoot Monitoring Report May 2017	May 2017
145	LETTER Regional Operations response to NPWS ~ amend the QS planning approval bandicoot monitoring conditions	N/A
146	LETTER to Mawland Quarantine Station advising on amendments to bandicoot monitoring program	N/A
147	North Head Long-nosed Bandicoot Monitoring Report May 2011	May 2011
148	Aboriginal Heritage Management Plan (front cover and table of contents)	2008
149	AHPM Site Plan Review 2012	January 2012 with updates in October 2012
150	CCHD comments Aboriginal Heritage Site Mgt Plan Review 10.2.12	N/A
151	Aboriginal perspective @ Q Station (email)	Jan- Feb 2016
152	Letter inviting MLAC onto QSCC 2007	N/A
153	Letter inviting MLAC onto QSCC 2012	N/A
154	IMS-GIS review	6-Oct-11
155	IMS-GIS outline	Oct-11
156	Examples of ehive records	N/A
157	Excerpt NPWS induction training 2012-14	N/A
158	NPWS induction cards	1/10/2015
159	Induction Recording Forms	N/A
160	NPWS Attachment to IMAMS Annual Report 2015	2015
161	IMAMS QS Completed forms Jan-March 2013	24-Jun-13
162	IMAMS QS Complete Reporting form April June 2013	18-Jul-13
163	IMAMS QS Completed forms July-Sept 2013	28-Oct-13
164	IMAMS report Oct-Dec 2013	31-Mar-14
165	Annual Data for IMAMS 2013	31-Mar-13
166	Quarantine Station Sustainability Report 2013-2014	N/A
167	Quarantine Station Sustainability Report 2015-2017	N/A
168	Briefing Note no annual report in 2011	4-Dec-12
169	IMAMS Report Jan-Dec 2015	2015
170	QSCC final minutes Meeting 48 - 180314	14-Mar-18
171	Sample of QS complaints or request for information	N/A
172	Quarnatine Station lease environmental incident procedures	9-Feb-15
173	OEH Statement on compliance with development approvals 13-14	N/A
174	OEH Statement on compliance with development approvals 15-17	N/A
175	Site management compliance summary 13-14	N/A
N/A: The date the document was prepared was not provided.		

## Appendix C. Consultation Summary

## Summary of Consultation

In accordance with CoA condition 230, a draft version of the Environmental Audit report was provided to relevant stakeholder organisations on 22 August 2018. In accordance with Condition 231, a 6 week period was allowed for comment with an extension for time agreed for the Department of Environment and Planning. The findings of the audit were also presented to the QSCC on 14 November 2018. No substantial issues were raised by the QSCC.

The following table details the organisations invited to comment and the nature of their comments.

Stakeholder	Date of response	Nature of comments
Department of Primary Industries – Fisheries	27 September 2018	Supports the recommendation to extend the existing mooring exclusion zone of Quarantine Beach. This would encourage growth and recovery of seagrass beds and critical habitat for small/ juvenile fish (the Little Penguin diet)
Roads and Maritime Services – Maritime Division	N/A	No comments
Office of Environment and Heritage – Heritage Division	N/A	No comments
Office of Environment and Heritage – NSW National Parks & Wildlife Service	1 August 2018	Minor editorial comments including appropriate terminology. Clarification on non-conformance issues listed.
Department of Planning and Environment	11 October 2018	More detail required to be included from the Annual Environmental Reports. This includes additional information on the self-reported non-compliances from the years 2013-14 and 2015-17. Clarification on the monitoring results for information with no listed data, or for results that do not fall within the acceptable range.
Quarantine Station Community Committee	20 August 2018	Cross reference non-compliances back to the CoA. Include a limitations section and executive summary in the report. Further contextualise the report as an environmental audit rather than an annual report.

SNC-Lavalin have considered the comments received through the consultation process in preparing the final audit report. A number of comments were of minor nature and related to editorial issues and use of correct terminology. The majority of the comments addressing specific issues in the report were related to the self-reported non-compliances. This included ensuring the non-compliances were consistent with the Annual Environmental Reports for Q Station. These issues have been addressed in this final report.