



Compliance Assessment Report

Expansion of the Monkey Mia Dolphin Resort, Monkey Mia, Shark Bay

RAC Tourism Assets Pty Ltd for Department of Water and Environmental Regulation

8 Davidson Terrace, Joondalup WA 6027

Prepared by:

SLR Consulting Australia

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Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
01	17 February 2025	MR	MG	AC

Basis of Report

This report has been prepared by SLR Consulting Australia (SLR) with all reasonable skill, care and diligence, and taking account of the timescale and resources allocated to it by agreement with RAC Tourism Assets Pty Ltd (the Client). Information reported herein is based on the interpretation of data collected, which has been accepted in good faith as being accurate and valid.

This report is for the exclusive use of the Client. No warranties or guarantees are expressed or should be inferred by any third parties. This report may not be relied upon by other parties without written consent from SLR.

SLR disclaims any responsibility to the Client and others in respect of any matters outside the agreed scope of the work.



Executive Summary

On behalf of the RAC Tourism Assets Pty Ltd, SLR (formerly 360 Environmental Pty Ltd) was engaged to conduct a Compliance Assessment Report (CAR) of the expansion of the Monkey Mia Dolphin Resort, Shark Bay (the proposal) with the conditions of Ministerial Statements (MS 709 and 1067. The project is described in Attachment 1 of MS 709 and 1067 as:

The expansion, incorporating construction and operation of the Monkey Mia Dolphin Resort through expansion of the existing resort area, provision of staff accommodation facilities and upgrading of the wastewater treatment plant, as documented in Ministerial Statement 709.

The expansion of the Monkey Mia Dolphin Resort commenced in October 2012 with the construction of the wastewater treatment plant, one of the three main proposal components as described in Schedule 1 of MS 709.

SLR undertook a third-party audit at the Monkey Mia Dolphin Resort, which is required annually to determine compliance with all conditions of Environmental authorisation. This document has been prepared to assess compliance of the Monkey Mia Dolphin Resort with conditions of MS 709 and 1067 and in doing so, addresses condition 4-6 of MS 1067. Condition 4-6 of MS 1067 requires the proponent to submit a compliance report to the Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (DWER).

This Compliance Assessment Report (CAR), required by condition 4.4 of MS 1067, covers the period 14 November 2023 to 13 November 2024. This Third-Party Audit has shown that Monkey Mia Dolphin Resort (MMDR) is in compliance with the environmental requirements.



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Acronyms and Abbreviations

CAP	Compliance Assessment Plan
CAR	Compliance Assessment Report
DBCA	Department of Biodiversity, Conservation and Attractions
DMP	Drainage Management Plan
DWER	Department of Water and Environmental Regulation
EMS	Environmental Management System
MMDR	Monkey Mia Dolphin Resort Pty Ltd
RAC	RAC Tourism Assets Pty Ltd



1.0 Introduction

Monkey Mia Dolphin Resort is located within a World Heritage area on a Shire of Shark Bay reserve, adjacent to the Department of Biodiversity, Conservation and Attractions (DBCA) Monkey Mia Recreation Zone and Visitor Centre of the Shark Bay Marine Park. On behalf of the RAC Tourism Assets Pty Ltd, SLR was engaged to conduct a Compliance Assessment Report (CAR) of the expansion of the Monkey Mia Dolphin Resort, Shark Bay (the proposal) with the conditions of Ministerial Statements (MS 709 and 1067. The proposal is described in Attachment 1 of MS 709 and 1067 as:

The expansion, incorporating construction and operation of the Monkey Mia Dolphin Resort through expansion of the existing resort area, provision of staff accommodation facilities and upgrading of the wastewater treatment plant, as documented in Ministerial Statement 709.

The expansion of the Monkey Mia Dolphin Resort commenced in October 2012 with the construction of the wastewater treatment plant, one of the three main proposal components as described in Schedule 1 of MS 709. This Compliance Assessment Report (CAR), required by condition 4.4 of MS 1067, covers the period 14 November 2023 to 13 November 2024.

There has been no major development works during the reporting period. A three megawatt solar field is in planning stage to reduce MMDR's carbon footprint through the reduction of diesel usage and emissions. This work will follow the completion of the Coral Bay Resort upgrade (currently due for completion in April 2026).

1.1 Project Approvals

The original resort facilities were established around 1985 and were not subject to environmental impact assessment under the Environmental Protection Act 1986. In 2002 a proposal to expand the existing resort area and increase the capacity from 600 to 1200 overnight guests, provide staff accommodation facilities, and upgrade the wastewater treatment plant (the Expansion of the Monkey Mia Dolphin Resort proposal) was referred to the Environmental Protection Authority (EPA) under section 38 of the EP Act. The EPA assessed the proposal at the level of Public Environmental Review and released its assessment report in February 2005 (EPA Report 1165).

Approval for the Proposal under the Environmental Protection Act 1986 (EP Act) was granted to the former proponent Monkey Mia Dolphin Resort Pty Ltd (MMDR) through issue of MS 709 on 28 December 2005. Subsequent approval extending the period for substantial commencement was granted under MS 919 on 18 December 2012 to the then proponent, Aspen Parks Property Management Ltd (Aspen). Substantial commencement of the proposal occurred in April 2013 with construction of the Wastewater Treatment Plant, a key element of the proposal, which satisfied the requirement of condition 4 in MS 919. Aspen transferred ownership to RAC Tourism Assets Pty Ltd (RAC) in December 2015.

An application to change conditions and increase the extent of the proposal of MS 709 under section 45C/46 of the EP Act, was submitted in April 2017. In June 2017, the Deputy Chairman of the Environmental Protection Authority (under delegation authority from the Minister for Environment) approved changes to MS 709 under section 45C of the EP Act. The change to the proposal included:

- An increase in the clearing area for the wastewater treatment plant
- The development and use of borrow pits requiring 3.14 ha of vegetation clearing
- Administrative changes to Schedule 1 of MS 709 to describe the Development Envelope

- Simplification of the resort expansion and removal of elements to the design that were not relevant to the environment
- Schedule 1 of MS 709 was replaced by Attachment 1 and outlines the summarised extent of the physical and operational elements of the project (Appendix B).

Commencement of earthworks for the other key elements of the proposal, the resort expansion and staff accommodation facilities, commenced in October 2017. MS 1067 was subsequently issued on 14 November 2017, changing conditions 3, 4 and 5 and deleting condition 6 of MS 709. Previous CARs addressing compliance with MS 709 and MS 919 are as follows:

- May 2016, addressing the audit period 28 December 2014 to 28 December 2015
- April 2017, addressing the audit period 29 December 2015 to 31 December 2016
- February 2019, addressing the audit period 14 November 2017 to 13 November 2018
- February 2020, addressing the audit period 14 November 2018 to 13 November 2019
- February 2021, addressing the audit period 14 November 2019 to 13 November 2020
- February 2022, addressing the audit period 14 November 2020 to 13 November 2021.
- April 2023, addressing the audit period 14 November 2021 to 13 November 2022.
- August 2024, addressing the audit period 14 November 2022 to 13 November 2023.

Only two implementation conditions of MS 919 regarding the time limit of authorisation and commencement of implementation of the proposal (919: M4.1 AND 919:4.2) remain valid. These two conditions were assigned a 'closed' status by the DWER in a letter issued to RAC on 28 November 2017. Therefore, compliance with MS 919 is not assessed in this CAR and will not be assessed in future CARs.

In November 2017, DWER conducted a compliance audit of MS 709, 919 and 1067. The DWER's desktop audit was unable to determine compliance with a number of implementation conditions and proponent commitments of MS 709, and DWER requested further information to verify the compliance status. RAC responded on 30 January 2018 with verification documents. The DWER confirmed that RAC remain in compliance with conditions of MS 709 on 15 February 2018.

A Compliance Assessment Plan (CAP) combining compliance requirements for MS 709, 919 and 1067 was prepared and approved by Department of Water and Environmental Regulation (DWER) on 31 May 2018. The CAP effectively supersedes the previously submitted CAPs for MS 709 and 919.

RAC has ongoing initiatives to reduce energy consumption and to minimise waste across all sites and in roadside operation. RAC's corporate Environmental Management System is certified to ISO 14001 and provides the means of managing compliance to statutory requirements, identifying, and controlling environmental risks and improving environmental performance. The Environmental Management System (EMS) covers processes and activities that may have impacts on the environment and includes planning and asset management.

The EMS provides a systematic approach to planning, implementation, reporting and reviewing or processes, programs, and procedures for the management of significant environmental impacts and to ensure compliance with environmental obligations, and is integrated with relevant operational processes such as Project Management and Contract Management.

1.2 Purpose

This document has been prepared to assess compliance of the Monkey Mia Dolphin Resort with conditions of MS 709 and 1067 and in doing so, addresses condition 4-6 of MS 1067. Condition 4-6 of MS 1067 requires the proponent to submit a compliance report to the Chief Executive Officer (CEO) of the DWER, and as per the condition, the CAR must contain the elements in Table 1.

Table 1: CAR Requirements

CAR requirements	CAR Section
Be endorsed by the proponents' CEO or a person delegated to sign on the CEO's behalf	Appendix A Statement of Compliance
Include a statement as to whether the proponent has complied with the conditions	Section 3
Identify all potential non-compliances and describe corrective and preventative actions taken	Section 2
Be made publicly available in accordance with the approval	N/A
Indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1	N/A

1.3 Objectives

The objectives of the audit were to:

- View evidence of compliance of environmental management with schedules and conditions
- Assess the performance of the environmental components
- Identify potential improvements in environmental performance
- Issue a Compliance Assessment Report (CAR), required by condition 4.4 of MS 1067, covering the period 14 November 2023 to 13 November 2024.

1.4 Scope of Audit

The Scope of the audit was to:

- Assess documentation
- Desktop review of documentation and field visit to confirm compliance
- Review the audit matrix to capture requirements and compliance management processes and previous audit findings
- Reporting.

1.5 Auditor and Methodology

For the RAC Tourism Assets Pty Ltd and on behalf of Manager, Compliance (Ministerial Statements), Department of Water and Environmental Regulation, the audit was undertaken by Michelle Rhodes, Lead Environmental Auditor (Certificate 119340). The third-party audit was conducted with reference to key auditing protocols, as prescribed under:

- ISO 19011:2014 Guidelines for Management Systems and in accordance with ISO 14001:2015; and
- Office of the Environmental Protection Authority 2012. Post Assessment Guideline for Preparing an Audit Table, Post Assessment Guideline No. 1, August.

The following documents were reviewed as part of the audit:

Table 2: Audit Documents

Document Title	Document Reference/Status
MS 709 and 1067 (Section 46)	MS 1067 was issued on 14 November 2017, which changed MS 709 conditions 3, 4 and 5 and deleted condition 6.
Drainage Management Plan	JBS&G Australia Pty Ltd T/A Strategen-JBS&G, 6 July 2020
Foreshore Management Plan	Monkey Mia Dolphin Resort, Foreshore Management Plan, Strategen, April 2017
Nutrient and Irrigation Management Plan	JBS&G Australia Pty Ltd T/A Strategen-JBS&G, 6 July 2020
Emergency Management Plan	RAC. 2024. Site Cyclone Response Plan Monkey Mia Dolphin Resort. RAC-P&R-PLN-CRP-4. November. RAC. 2024. Site Emergency Response. Monkey Mia Dolphin Resort. RAC-P&R-PLN-ERP-8. November.

A pre-audit review of all relevant documentation was undertaken, and the audit protocol reviewed based on the environmental requirements established in the various documentation. Refer Appendices B-G for audit tables and results, Appendix H for evidence and Appendix I for photos.

Documents and processes were reviewed. The audit table was completed to demonstrate compliance (or otherwise) with the environmental commitments made in approval documentation. A copy of the evidence to satisfy auditable criteria was collected and is saved on the corporate server and stored in accordance with the Quality Management Procedure. Some key compliance documents that were noted are provided in Appendix H and photos are provided in Appendix I.

1.5.1 Audit Specifications

Audit details are summarised in Table 3.

Table 3: Audit Details

Audit Specifications	Audit Details
Audit	Compliance audit
Site Visit	17/2/2025-20/2/2025
Location	Monkey Mia Dolphin Resort, Shark Bay
Audit Purpose	Assessment of environmental compliance
Audit Source Document	Refer Table 1
Lead Auditor	Michelle Rhodes
RAC Contract Contact	Rachel Enright

Audit Specifications	Audit Details
	Health and Safety Advisor – Parks and Resorts M 0413630345 E rachael.enright@rac.com.au
RAC Auditee	Martin Grenside RAC Monkey Mia Dolphin Resort - Resort Manager M 0458 284 357 E martin.grenside@racmonkeymia.com.au

1.5.2 Definitions of Audit Compliance

Definitions of compliance are summarized in Table 4:

Table 4: Definitions and Colour Codes for Compliance

Compliance	Definition	Notes
Completed/Compliant (C)	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> Ingoing requirements that have been met during the reporting period; and Requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'Completed'.
Non-Compliance (NC)	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element have not been met during the reporting period and its status is not 'Completed'.
Potentially Non-compliant (PNC)	Possible or likely failure to meet the requirements of the audit element.	This term may only be used where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred. Where this term is used, the proponent should advise when investigations will be finalized and provide follow up advice of the outcome.
In Process (IP)	Where an audit element requires a management or monitoring plan be submitted to the OEPA or another government agency for approval, that submission has been made and no further information or changes have been requested by the OEPA or the other government agency and assessment by the OEPA or other	The term 'In process' must only be used for the purpose stated in the definition column. 'In process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires ongoing implementation throughout the life of the project (e.g. implementation of a management plan).

Compliance	Definition	Notes
	government agency for approval is still pending.	
Not required at this stage (NR)	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.

Source: adapted from Post Assessment guidance (OEPA 2012).

Recommendations for corrective action(s) have been provided where the status in the audit report is identified as a Non-compliance and Potentially Non-compliant. Opportunities for Improvement and Continuous Improvements have been documented. The audit table has been colour-coded for ease of interpretation.

1.6 Project Status

The resort is in the operational phase. Construction of the resort expansion and staff accommodation facilities commenced in October 2017 with earthworks and clearing of vegetation. The construction period was timed to take place during the low tourist season to ensure minimal impacts to guests. Practical completion of these facilities was achieved on 16 September 2018.

The project is described in MS 709 and MS 1067 and consists of three separate major components as outlined in the Attachment of MS 709. These include:

- 1 Expansion of the existing resort area.
- 2 Staff accommodation facilities.
- 3 Upgrading of the wastewater treatment plant.

Construction of the "upgrading of the wastewater treatment plant" using a Membrane Bioreactor Package Plant, commenced in 2013 and was subsequently completed in 2014. The approval of the 45C/46 changes to MS 709 approved an increase of the area in which the wastewater treatment plant resides. In April 2022, there was the Monkey Bar redevelopment, a new Putt golf and kids activity area.

1.7 Information Provided

Information provided as part of the audit include:

- Annual Report for Licence L7426/2000/8
- Legal update email
- Organisational chart
- Environmental Targets and Objectives and minutes showing the leadership group is engaged developing the targets
- Waste data
- Minutes
- Training Matrix
- Waste Summary Report
- Waste Information –explain the 'how' and some of the 'why' MMDR manages Waste.

1.8 Report Presentation

This report is presented as follows:

- Chapter 1 – Background of Project, Scope, and Methodology
- Chapter 2 – Results of Independent Audit
- Chapter 3 – Recommendations and Conclusions
- Chapter 4 – Limitations of Audit
- Chapter 5 – References:
 - Appendix A Statement of Compliance
 - Appendix B Compliance with conditions MS 709 and 1067
 - Appendix C Conformance with Schedule 1, Attachment 1 – Location and authorised extent of project elements
 - Appendix D Conformance with the Drainage Management Plan
 - Appendix E Conformance with the Nutrient and Irrigation Management Plan
 - Appendix F Conformance with the Foreshore Management Plan
 - Appendix G Conformance with the Environmental Management System
 - Appendix H Evidence
 - Appendix I Photos.

2.0 Audit Findings

This section of the report summarises the audit findings. Evidence of compliance is documented in Appendices B -G

2.1 Compliance with Conditions

The results of the audit of MS 709 and 1067 are shown in Appendix B. A total of 47 conditions and sub-conditions were audited. All conditions of MS 709 and 1067 were assessed as either 'Compliant - Completed' or 'Compliant' (36) or 'Not Required' (11) at this Stage'.

The management plans were developed in consultation and received feedback from DBCA and the Shire of Shark Bay prior to the submission of the management plans to DWER in May 2017. Amendments were made to the plans in 2020 based on comments received from the DWER in May 2020. The three management plans are being implemented during operation of the Resort and during the audit period. Despite not being formally approved, and there was no evidence to suggest that due to the plans not receiving Ministerial approval, that the environment was negatively impacted. The plans were scheduled to be approved at the November 2021 DWER Board meeting and feedback remains pending at the time of writing.

2.2 Conformance with Attachment 1 – Location and authorised extent of project elements

The operation conforms with the authorised extent of the proposal as documented in Schedule 1 of the statement. The results of the audit are shown in Appendix C.

2.3 Conformance with the Drainage Management Plan

The operation conforms with the requirements of the approved Drainage Management Plan (DMP; Appendix D). The DMP is dated 6/7/2020 and the document states it will be reviewed on an annual basis to ensure that the plan takes into consideration amendments to operations, monitoring results, audits, continuous improvement, and changes in regulatory and corporate requirements. If revised, a copy of the revised DMP will be provided to Department of Water and Environmental Regulation as part of the CAR.

2.4 Conformance with the Nutrient and Irrigation Management Plan

The operation conforms with the requirements of the approved Nutrient and Irrigation Management Plan (NIMP; Appendix E) were identified during the audit. The NIMP is required to be reviewed on an annual basis to ensure that the plan takes into consideration amendments to operations, monitoring results, audits, continuous improvement, and changes in regulatory and corporate requirements. If revised, a copy of the revised NIMP will be provided to the Department of Water and Environment Regulation as part of the CAR.

2.5 Conformance with the Foreshore Management Plan

The operation conforms with the requirements of the approved Foreshore Management Plan (FMP; Appendix F) were identified during the audit. The FMP is dated April 2017 and the document states that the FMP will be reviewed on an annual basis to ensure that the plan takes into consideration amendments to operations, monitoring results, audits, continuous improvement, and changes in regulatory and corporate requirements. If revised, a copy of the revised FMP will be provided to the OEPA as part of the CAR.

2.6 Conformance with the Environmental Management System

The Environmental Management System (EMS; Appendix G) requires quarterly progress reports on the implementation of environmental management measures. A summary compliance checklist has been developed to record quarterly progress on site. Non-compliances occurred against licence conditions during the reporting period. The non-compliance events were reported as required under the licence conditions (Conexa 2024). The reporting period for Operating Licence falls between 1/4/2023 and 31/3/2024 and the annual compliance reporting period is 14/11/2023-13/11/2024. Only those exceedances that fell within the annual compliance reporting period are described:

- Groundwater samples exceeded the licence limit for Enterococci (elevated Enterococci) were detected at:
 - MB2-1, MB3, MB4 and MB8 in the January 2024 sampling

RAC Parks and Resorts continues to implement improvement opportunities. Table 5 provides some general observations.

Table 5: General Observations Following 2024 Audit

Area of Improvement	Continuous Improvement/Considerations 2023	Continuous Improvement/Considerations 2024
Energy and Carbon Emissions	RAC supports systems that promote energy efficiency, reduction of emissions, and transition to renewable energy sources where possible. As MMDR is powered by diesel fuel there are opportunities to reduce greenhouse emissions. A three megawatt solar field has been approved and this will reduce carbon emissions by up to 90% annually through the reduction of diesel usage.	Meetings with the Mulgana committee are progressing to finalise the location of the solar panels (which will include some 1500 panels).
Electric Charging	RAC MMDR has a double electric charging station for electric vehicles. RAC supports expanding the rollout of eco-driving programs such as CleanRun EcoDrive.	Five electric golf buggies remain in operation on the property.
Risk Mitigation from potential fuel spills	RAC MMDR has installed a break coupling to prevent spills from the fuel bowser. The valve automatically closes when an excessive load, pulls apart and closes its valves thus immediately eliminating flow in both directions.	No fuel spills recorded. DG audit in 2024 implemented improvements.
Water Sampling	Bottles have been labelled with QR codes to identify location and analytes – saving money and time and improving accuracy. In future a review of the water quality sampling program required under the licence is recommended with a view to identify efficiencies.	Ongoing
Reporting	Ensure correspondence of the CAR being issued to DAWE are kept on file for future records.	Ongoing
Waste Reduction	As of 2021 MMDR operates a waste transport vehicle and compactor transferring waste to the Denham waste facility. Recycling initiatives continue to be supported, working with the local city, and education on reducing waste volumes with a focus on diversion rates. Compactor rubbish truck in operation.	Containers for Change – increased from 4-5 IBC's to 25 -30 IBC's every six weeks. 60:40 cost split.
Housekeeping	All Housekeeping items addressed and policies in place to mitigate any further issues. Site is generally clean and tidy (refer Appendix I Photos).	
Environmental Management System	Perimeter fencing has been installed around the old WWTP evaporation ponds to stop fauna entering.	Ongoing inspections. No new fauna trapped. New fence replaced as old one was rusty. Internal brushwood fencing replaced behind fuel bowsers due to it being a fire hazard.

3.0 Conclusion and Recommendations

This Third-Party Audit has shown that Monkey Mia Dolphin Resort (MMDR) is in compliance with the environmental requirements. Evidence provided by MMDR shows that environmental management commitments included in the management plans are currently being implemented and continuous improvements are occurring on site.



4.0 Limitations

This report is produced strictly in accordance with the scope of services set out in the contract or otherwise agreed in accordance with the contract. SLR makes no representations or warranties in relation to the nature and quality of soil and water other than the visual observation and analytical data in this report.

In the preparation of this report, ALR has relied upon documents, information, data, and analyses ('client's information') provided by the client and other individuals and entities. In most cases where client's information has been relied upon, such reliance has been indicated in this report. Unless expressly set out in this report, SLR has not verified that the client's information is accurate, exhaustive, or current and the validity and accuracy of any aspect of the report including, or based upon, any part of the client's information is contingent upon the accuracy, exhaustiveness, and currency of the client's information. 360 Environmental shall not be liable to the client or any other person in connection with any invalid or inaccurate aspect of this report where that invalidity or inaccuracy arose because the client's information was not accurate, exhaustive, and current or arose because of any information or condition that was concealed, withheld, misrepresented, or otherwise not fully disclosed or available to SLR.

Aspects of this report, including the opinions, conclusions, and recommendations it contains, are based on the results of the investigation, sampling and testing set out in the contract and otherwise in accordance with normal practices and standards. The investigation, sampling and testing are designed to produce results that represent a reasonable interpretation of the general conditions of the site that is the subject of this report. However, due to the characteristics of the site, including natural variations in site conditions, the results of the investigation, sampling and testing may not accurately represent the actual state of the whole site at all points.

It is important to recognise that site conditions, including the extent and concentration of contaminants, can change with time. This is particularly relevant if this report, including the data, opinions, conclusions, and recommendations it contains, are to be used a considerable time after it was prepared. In these circumstances, further investigation of the site may be necessary.

Subject to the terms of the contract between the Client and SLR Pty Ltd, copying, reproducing, disclosing, or disseminating parts of this report is prohibited (except to the extent required by law) unless the report is produced in its entirety including this page, without the prior written consent of SLR Pty Ltd.

5.0 Closure

Thank you for retaining SLR to provide this service. We wish you well and look forward to working with you again. Should you have questions or require additional information, please do not hesitate to contact the below.

Sincerely,

SLR Consulting Australia



Michelle Rhodes, Technical Director



6.0 References

AS/NZS ISO 19011:2014 Guidelines for Auditing Management Systems.

AS/NZS ISO 14001:2015 International Environmental Management Standard.

AS/NZS ISO 9001:2016 Quality Management Systems.

Conexa. 2024. RAC Monkey Mia Dolphin Resort. Wastewater Treatment Plant. Annual Environmental Report.

Office of the Environmental Protection Authority (OEPA). 2012. Post Assessment Guideline for Preparing an Audit Table, Post Assessment Guideline No. 1, August.

RAC. 2024. Website: <https://rac.com.au/about-rac/advocating-change/sustainability/our-commitment>



7.0 Feedback

At SLR, we are committed to delivering professional quality service to our clients. We are constantly looking for ways to improve the quality of our deliverables and our service to our clients. Client feedback is a valuable tool in helping us prioritise services and resources according to our client needs.

To achieve this, your feedback on the team's performance, deliverables and service are valuable and SLR welcome all feedback via <https://www.slrconsulting.com/en/feedback>. We recognise the value of your time and we will make a \$10 donation to our Charity Partner - Lifeline, for every completed form.



Appendix A Statement of Compliance



Statement of Compliance

1. Proposal and Proponent Details

Proposal Title	EXPANSION OF THE MONKEY MIA DOLPHIN RESORT MONKEY MIA, SHARK BAY
Statement Number	Statement No. 709 and 1067
Proponent Name	RAC Tourism Assets Pty Ltd
Proponent's Australian Company Number (where relevant)	ABN 23 168 253 085

2. Statement of Compliance Details

Reporting Period	14/11/2023 to 13/11/2024
------------------	--------------------------

Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))					
Pre-construction		Construction		Operation	✓
				Decommissioning	

Audit Table for Statement addressed in this Statement of Compliance is provided at Attachment:	2
<p>An audit table for the Statement addressed in this Statement of Compliance must be provided as Attachment 2 to this Statement of Compliance. The audit table must be prepared and maintained in accordance with the Department of Water and Environmental Regulation (DWER) <i>Post Assessment Guideline for Preparing an Audit Table</i>, as amended from time to time. The 'Status Column' of the audit table must accurately describe the compliance status of each implementation condition and/or procedure for the reporting period of this Statement of Compliance. The terms that may be used by the proponent in the 'Status Column' of the audit table are limited to the Compliance Status Terms listed and defined in Table 1 of Attachment 1.</p>	

Were all implementation conditions and/or procedures of the Statement complied with within the reporting period? (please tick ✓ the appropriate box)			
No (please proceed to Section 3)		Yes (please proceed to Section 4)	✓

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
INITIALS: _____

3. Details of Non-compliance(s) and/or Potential Non-compliance(s)

The information required Section 3 must be provided for each non-compliance or potential non-compliance identified during the reporting period covered by this Statement of Compliance.

Non-compliance/potential non-compliance 3-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?
Was the implementation condition or procedure non-compliant or potentially non-compliant?
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?

Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	<input type="checkbox"/> No

What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)
What was the cause(s) of the non-compliance or potential non-compliance?
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)

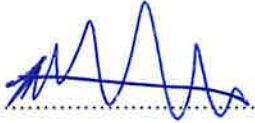
For additional non-compliance or potential non-compliance, please duplicate this page as required.

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
INITIALS: _____

4. Proponent Declaration

I, Martin Grenside Resort Manager, (*full name and position title*) declare that I am authorised on behalf of RAC Monkey Mia Dolphin Resort (*being the person responsible for the proposal*) to submit this form and that the information contained in this form is true and not misleading.

Signature:



Date:

29/5/2025

Please note that:

- it is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give or cause to be given information that to his knowledge is false or misleading in a material particular; and
- the Chief Executive Officer of the DWER has powers under section 47(2) of the *Environmental Protection Act 1986* to require reports and information about implementation of the proposal to which the statement relates and compliance with the implementation conditions.

5. Submission of Statement of Compliance

One hard copy and one electronic copy (preferably PDF on CD or thumb drive) of the Statement of Compliance are required to be submitted to the Chief Executive Officer, DWER, marked to the attention of Manager, Compliance (Ministerial Statements).

Please note, the DWER has adopted a procedure of providing written acknowledgment of receipt of all Statements of Compliance submitted by the proponent, however, the DWER does not approve Statements of Compliance.

6. Contact Information

Queries regarding Statements of Compliance, or other issues of compliance relevant to a Statement may be directed to Compliance (Ministerial Statements), DWER:

Manager, Compliance (Ministerial Statements)

Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
Joondalup DC
WA 6919

Phone: (08) 6364 7000

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

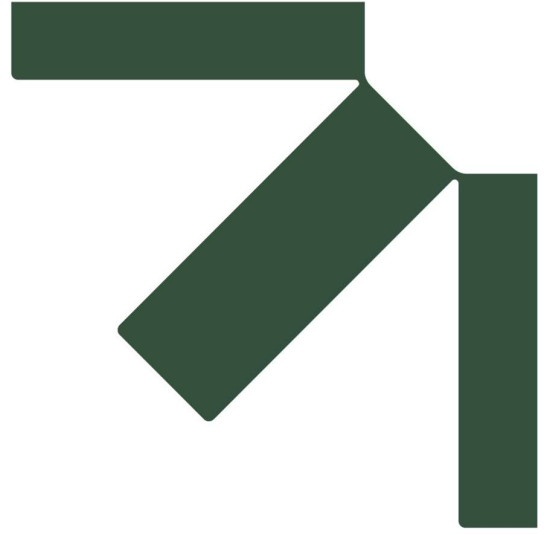
Post assessment documents can be found at www.epa.wa.gov.au

Each page (including Attachment 2) must be initialed by the person who signs Section 4 of this Statement of Compliance.
INITIALS: _____

ATTACHMENT 1**Table 1 Compliance Status Terms**

Compliance Status Terms	Abbrev	Definition	Notes
Compliant	C	Implementation of the proposal has been carried out in accordance with the requirements of the audit element.	This term applies to audit elements with: <ul style="list-style-type: none"> ongoing requirements that have been met during the reporting period; and requirements with a finite period of application that have been met during the reporting period, but whose status has not yet been classified as 'completed'.
Completed	CLD	A requirement with a finite period of application has been satisfactorily completed.	This term may only be used where: <ul style="list-style-type: none"> audit elements have a finite period of application (e.g. construction activities, development of a document); the action has been satisfactorily completed; and the DWER has provided written acceptance of 'completed' status for the audit element.
Not required at this stage	NR	The requirements of the audit element were not triggered during the reporting period.	This should be consistent with the 'Phase' column of the audit table.
Potentially Non-compliant	PNC	Possible or likely failure to meet the requirements of the audit element.	This term may apply where during the reporting period the proponent has identified a potential non-compliance and has not yet finalized its investigations to determine whether non-compliance has occurred.
Non-compliant	NC	Implementation of the proposal has not been carried out in accordance with the requirements of the audit element.	This term applies where the requirements of the audit element are not "complete" have not been met during the reporting period.
In Process	IP	Where an audit element requires a management or monitoring plan be submitted to the DWER or another government agency for approval, that submission has been made and no further information or changes have been requested by the DWER or the other government agency and assessment by the DWER or other government agency for approval is still pending.	<p>The term 'In Process' may not be used for any purpose other than that stated in the Definition Column.</p> <p>The term 'In Process' may not be used to describe the compliance status of an implementation condition and/or procedure that requires implementation throughout the life of the project (e.g. implementation of a management plan).</p>

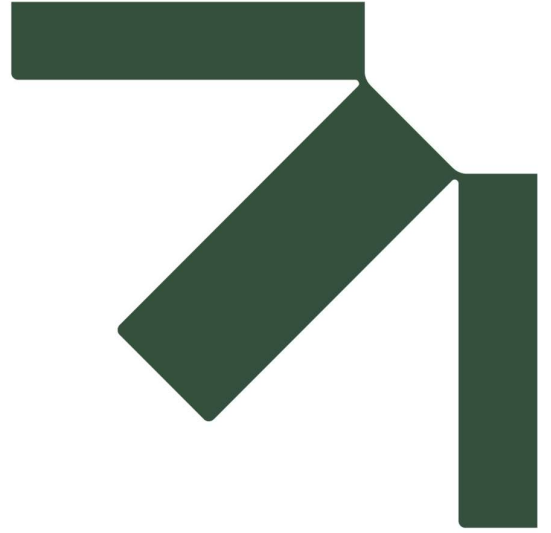
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INITIALS: _____



Appendix B Compliance with conditions MS 709 and 1067

Appendix B Compliance with conditions MS 709 and 1067			Audit Criteria and methodology - New Summary Project Permit			
Audit Code	Status	Requirement	Timing	Evidence	Auditor Comment	Compliance Status at the Time of the Audit
709:M1.1	Implementation - overall	The proponent shall implement the proposal as documented in Schedule 1 of this statement subject to the conditions and procedures of this statement.	Implement the Proposal as documented in Schedule 1 of this Statement subject to the conditions and procedures of this Statement. Ongoing	Evidence is provided in Appendix B	Schedule 1 of MS 709 was consolidated and replaced by Attachment 1 in June 2017 and contains the physical and operational elements of the project.	Compliant (Y)
					Conformance with Attachment 1 of MS 709 is in Appendix C.	Compliant (Y)
709:M2.1	Proposal Commitments - overall	The proponent shall implement the environmental management commitments documented in Schedule 2 of this statement.	Implement the Environmental Management Commitments documented in Schedule 2 of this Statement. Ongoing	Annual CAR	Conformance with Schedule 2 (Proponent Commitments) of MS 709 is at the end of this audit table. Proponent Commitments refer to: · The Environmental Management System · The Construction Management Plan · Aboriginal Heritage and Culture.	Compliant (Y) Compliant (Y) Compliant (Y)
709:M3.1	Replaced by MS 1067					Not applicable (NA)
709:M3.2	Replaced by MS 1067					Not applicable (NA)
709:M3.3	Replaced by MS 1067					Not applicable (NA)
1067:M3.1	Change in Name and Address	The proponent shall notify the CEO* of any change of its name, physical address or postal address for the serving of notices or other correspondence within twenty-eight (28) days of such change. Where the proponent is a corporation or an association of persons, whether incorporated or not, the postal address is that of the principal place of business or the principal office in the State.	Notify CEO of DWER of any change of contact name and/or address within 28 days of such change. Overall and ongoing	Management advice obtained during site audit.	The proponent's name or address did not change during the audit period.	Compliant (Y)
709:M4.1 (replaced by 919:M4-1)	Replaced by MS 1067					Not applicable (NA)
709:M4.2 (replaced by 919:M4-2)	Replaced by MS 1067					Not applicable (NA)
1067:M4.1	Compliance Reporting	The proponent shall prepare, submit and maintain a Compliance Assessment Plan to the CEO within six (6) months of the date of this Statement, or as agreed in writing by the CEO.	Prepare and submit a Compliance Assessment Plan (CAP) by 14 May 2018 Overall	R_001_Strategen-JBS&G_MS 709, 919 and 1067 Compliance Assessment plan_01052018	A CAP (R_001), combining compliance requirements for MS 709 and 1067, was submitted to DWER on 1 May 2018 (C_001).	Compliant (Y)
			Ongoing	C_001_Strategen-JBS&G_Monkey Mia Dolphin Resort CAP Submission to DWER_01052018	No changes to the CAP have been made since it was approved on 31 May 2018.	Compliant (Y)
1067:M4.2	Compliance Reporting	The Compliance Assessment Plan shall indicate: (1) the frequency of compliance reporting; (2) the approach and timing of compliance assessments; (3) the retention of compliance assessments; (4) the method of reporting of potential non-compliances and corrective actions taken; (5) the table of contents of Compliance Assessment Reports; and (6) public availability of Compliance Assessment Reports.	Ongoing	C_002_DWER_CAP Approval_31052018	The CAP was approved by DWER on 31 May 2018 (C_002).	Compliant (Y)
1067:M4.3	Compliance Reporting	After receiving notice in writing from the CEO that the Compliance Assessment Plan satisfies the requirements of condition 4-2, the proponent shall assess compliance with conditions in accordance with the Compliance Assessment Plan required by condition 4-1.	Ongoing	C_002_DWER_CAP Approval_31052018	The CAP was approved by DWER on 31 May 2018 (C_002). Assess compliance according to the CAP.	Compliant (Y)
				R_002_MS 709 and MS 1067 CAR 2019_12022019	The 2019 CAR (R_002) was submitted to DWER on the 12 February 2019 (C_003).	Compliant (Y)
				R_003_MS 709 and MS 1067 CAR 2020_11022020. C_003_Strategen-JBS&G_CAR for MS 709 and 1067 Submission to DWER_12022019	The 2020 CAR (R_003) was submitted to DWER on the 12 February 2020.	Compliant (Y)
				C_004_Strategen-JBS&G_CAR for MS 709 and 1067 submission to DWER	The 2021 CAR (R_004) was submitted to DWER on the 20 February 2022.	Compliant (Y)
1067:M4.4	Compliance Reporting	The proponent shall retain reports of all compliance assessments described in the Compliance Assessment Plan required by condition 4-1 and shall make those reports available when requested by the CEO.	Ongoing	Annual CARs and make available when requested. R_002_MS 709 and MS 1067 CAR 2019_12022019. R_003_MS 709 and MS 1067 CAR 2020_11022020	The auditors have retained a copy of the previous CARs and the Proponent maintain a copy (R_002; R_003).	Compliant (Y)
			Overall	Management advice during site audit	There has been no request by the CEO to make the previous CAR available.	Compliant (Y)
1067:M4.5	Compliance Reporting	The proponent shall advise the CEO of any potential non-compliance (PNC) within seven (7) days of that non-compliance being known.	Overall, and within seven (7) days of that non-compliance being known	C_005 Submission of management plans to DWER	There were no known non-compliances during the audit period. RAC await formal correspondence from DWER relating to approval of the operational Management Plans and to therefore confirm the compliance status of 709:M7.1; 709 M8.1; 709:M9.1.	Compliant (Y)
1067:M4.6	Compliance Reporting	The proponent shall submit to the CEO the first Compliance Assessment Report fifteen (15) months from the date of issue of this Statement addressing the twelve (12) month period from the date of issue of this Statement and then annually from the date of submission of the first Compliance Assessment Report, or as agreed in writing by the CEO.	Overall. By 14 February 2019 and then annually thereafter.	Submit annual CARs. R_002_MS 709 and MS 1067 CAR 2019_12022019	The first initial CAR (R_002) was submitted on the 12 February 2019 (C_003) within 15 months from the date of issue of MS 1067.	Compliant (Y)
		The Compliance Assessment Report shall: (1) be endorsed by the proponent's CEO or a person delegated to sign on the CEO's behalf; (2) include a statement as to whether the proponent has complied with the conditions; (3) identify all potential non-compliances and describe corrective and preventative actions taken; (4) be made publicly available in accordance with the approved Compliance Assessment Plan; and (5) indicate any proposed changes to the Compliance Assessment Plan required by condition 4-1.		C_003_Strategen-JBS&G_CAR for MS 709 and 1067 Submission to DWER_12022019		Compliant (Y)
709:M5.1:1	Replaced by MS 1067:M4.1 and M4.2.					Not applicable (NA)
709:M5.1:2	Replaced by MS 1067:M4.3.					Not applicable (NA)
709:M5.2	Condition deleted.					Not applicable (NA)
1067:M5-1	Public Availability of Plans and Reports	Subject to condition 5-2, within a reasonable time period approved by the CEO of the issue of this Statement and for the remainder of the life of the proposal the proponent shall make publicly available, in a manner approved in writing by the CEO, all environmental plans and reports required under this statement and Statement 709.	Make environmental plans and reports publicly available in accordance with the CAP. Overall and within a reasonable time period approved by the CEO	Environmental plans, CAP and CARs publicly available	This CAR and environmental plans, are publicly available in accordance with the Post Assessment guideline (OEPA 2012b), and in accordance with amendments to that guidance as may occur from time to time.	Compliant (Y)
				https://parksandresorts.rac.com.au/monkey-mia/environmental-management/	All management plans and reports are available on the RAC Monkey Mia website.	Compliant (Y)
1067:M5-2	Public Availability of Plans and Reports	If any parts of the plans and reports referred to in condition 5-1 contains particulars of: (1) a secret formula or process; or (2) confidential commercially sensitive information; the proponent may submit a request for approval from the CEO to not make those parts of the plans and reports publicly available. In making such a request the proponent shall provide the CEO with an explanation and reasons why the data should not be made publicly available.	If environmental plans or reports contain sensitive information, request the CEO not to make those parts of the documents publicly available. Overall and ongoing.	Written request to CEO of DWER not to make parts of plans or reports publicly available	There was no (1) secret information or (2) commercially sensitive information during the audit period, therefore no written requests from the proponent were made to the CEO of the DWER.	Compliant (Y) Compliant (Y) Compliant (Y)
709:M6.1	Condition deleted.					Not applicable (NA)
709:M6.2	Condition deleted.					Not applicable (NA)
709:M6.3	Condition deleted.					Not applicable (NA)
709:M6.4	Condition deleted.					Not applicable (NA)
709:M6.5	Condition deleted.					Not applicable (NA)
709:M7.1	Drainage Management Plan	Prior to commencement of construction associated with the resort expansion, the proponent shall prepare a Drainage Management Plan, to the requirements of the Minister for the Environment on advice of the Environmental Protection Authority.	Prepare a Drainage Management Plan during design.	C_005_Submission of management plans to DWER	Strategen-JBS&G, on behalf of RAC contacted DWER on the 17 October 2019 (C_006) seeking a status update for each of the plans and ultimately, formal approval from DWER for their implementation.	Compliant (Y)
		This Plan shall address: 1. management of stormwater quality and quantity; 2. potential for erosion, local flooding and contaminant discharge; 3. minimising pollutants at their source; and 4. pollutant removal.			Following a request for amendments received from the Department on 7 May 2020, each management plan was revised and subsequently resubmitted to the Department on 10 July. The management plans have not yet received formal approval since that time.	Compliant (Y)
		Note: In preparation of advice to the Minister for the Environment, the Environmental Protection Authority expects that the advice of the following agencies will be obtained: · Department of Conservation and Land Management; and · Shire of Shark Bay.			Advice obtained from agencies and local government. Now DBCA.	Compliant (Y)
709:M7.2	Drainage Management Plan	The proponent shall implement the Drainage Management Plan required by condition 7-1.	Implement the Drainage Management Plan required by condition 7.1. Overall.	Evidence of implementation is in Appendix C of this compliance report	The key actions of the DMP were assessed during this audit period and it was found that of the 12 key actions identified within the DMP: · All are conformant · None are potentially non-conformant.	Compliant (Y)
					The DMP was implemented and objectives of the DMP were met and this requirement has been assessed as compliant. Refer to Appendix D for further detail.	Compliant (Y)
709:M7.3	Drainage Management Plan	The proponent shall make the Drainage Management Plan required by condition 7-1 publicly available.	Make the Drainage Management Plan publicly available. Overall.	Drainage Management Plan available on RAC Monkey Mia website. https://parksandresorts.rac.com.au/monkey-mia/environmental-management/	There have been no requests from stakeholders for the DMP to be made available during the audit period, in line with the Post Assessment Guideline (OEPA 2012b).	Compliant (Y)
709:M8.1	Nutrient and Irrigation Management Plan	Prior to commencement of construction associated with the resort expansion, the proponent shall prepare a Nutrient and Irrigation Management Plan, to the requirements of the Minister for the Environment on advice of the Environmental Protection Authority.	Design Prior to commencement of construction associated with the resort expansion.	Nutrient and Irrigation Management Plan C_005_Submission of management plans to DWER	Refer to 709:M7.1	Compliant (Y)

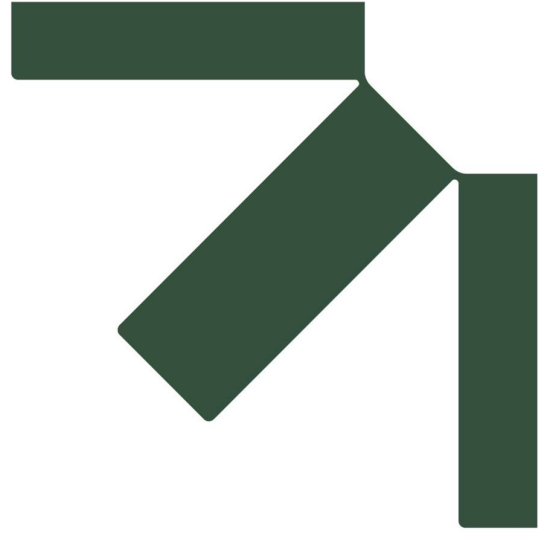
		This plan shall address: 1. method of application of nutrients; 2. irrigation program; 3. water conservation 4. recommendation for low nutrient and water requirement plants and grasses; and 5. prescribed fertiliser applications.				Compliant (Y)
		Note: In preparation of advice to the Minister for the Environment, the Environmental Protection Authority expects that the advice of the following agencies will be obtained:				
		- Department of Conservation and Land Management; and			Now DBCA.	
		- Shire of Shark Bay.				
709:M8.2	Implementation of the Nutrient and Irrigation Management Plan	The proponent shall implement the Nutrient and Irrigation Management Plan required by condition 8-1.	Implement the Nutrient and Irrigation Management Plan required by condition 8.1. Overall and ongoing.	Evidence of implementation is in Appendix D of this compliance report.	The key actions of the NIMP were assessed during this audit period and it was found that of the 17 key actions identified within the NIMP: - 16 conform - One conforms (complete) - None are potentially non-conformant - None are N/A.	Compliant (Y)
					The NIMP was implemented and the objectives of the NIMP were met during the audit period and this requirement has been assessed as compliant. Refer to Appendix E for further detail.	
709:M8.3	Make Nutrient and Irrigation Plan publicly available	The proponent shall make the Nutrient and Irrigation Management Plan required by condition 8-1 publicly available.	Make Nutrient and Irrigation Plan publicly available by condition 8.1. Ongoing.	201104_Site audit, 201104_Monkey Mia Resort management advice	There have been no requests from stakeholders for the NIMP to be made available during the audit period, in line with the Post Assessment Guideline (OEPA 2012b).	Compliant (Y)
709:M9.1	Foreshore Management Plan	Prior to commencement of construction associated with the resort expansion, the proponent shall prepare a Foreshore Management Plan, to the requirements of the Minister for the Environment on advice of the Environmental Protection Authority. This plan shall address: 1. minimising risk of dune erosion; 2. formalised access points; 3. definition of dune preservation and fencing areas; 4. rehabilitation and restoration of foreshore areas, incorporating stabilisation; 5. identification of species to be planted; and 6. education and signage. Note: In preparation of advice to the Minister for the Environment, the Environmental Protection Authority expects that the advice of the following agency will be obtained: - Department of Conservation and Land Management.	Design.	Foreshore Management Plan. C_005_Submission of management plans to DWER	Prior to commencement of construction associated with the resort expansion. Refer to 709:M7.1.	Compliant (Y)
709:M9.2	Implement Foreshore Management Plan	The proponent shall implement the Foreshore Management Plan required by condition 9-1.	Implement the Foreshore Management Plan. Overall and ongoing.	Evidence of implementation is in Appendix E of this compliance report	The key actions of the FMP were assessed during this audit period and it was found that of the 14 key actions identified within the FMP: - 13 are conformant - None are potentially non-conformant - One is N/A.	Compliant (C)
					The FMP was implemented, and the objectives of the FMP were met during the audit period and this requirement has been assessed as compliant. Refer to Appendix F for further detail.	
709:M9.3	Make Foreshore Management Plan publicly available	The proponent shall make the Foreshore Management Plan required by condition 9-1 publicly available.	Make the Foreshore Management Plan by condition 9.1 publicly available.	Foreshore Management Plan publicly available https://parksandresorts.rac.com.au/monkey-mia/environmental-management/ 201104_Site audit 201104_Monkey Mia Resort management advice	There have been no requests from stakeholders for the FMP to be made available during the audit period.	Compliant (C)
709:P1	Environmental Management System	Have in place, and make publicly available an Environmental Management System (EMS) for this project, which will include: - Environmental policies specific to the proposed resort and wastewater treatment plant facilities and corporate commitment to it. - Environmental Management Program with specific Management Plans to address the environmental impacts, including: o Foreshore Management Plan; o Nutrient and Irrigation Management Plan; and o Wastewater Treatment Management Plan. - Implementation and operation of actions to meet environmental performance. - Setting of appropriate objectives and targets, to meet environmental performance. - Measurement and evaluation of environmental performance. - Creation of appropriate management structures and responsibilities including human, equipment and financial resources. - Training, including induction, in environmental management procedures. - Development of communication procedures to staff, visitors, members of the community and government officers, and communicating relevant procedures and requirements to suppliers and contractors. - Development of performance monitoring and measurement procedures on the key features of the proposal which may impact on the environment. - Development of corrective and preventative procedures. - Development of management review and feedback procedures. Note: Advice from CALM.	Prior to construction and post construction - ongoing and overall.	Have in place an Environmental Management System and make the Environmental Management System publicly available. Appendix G	The EMS for key features of the ongoing operation of the resort, post construction includes the implementation of the: - FMP (Appendix F of this report) - NIMP (Appendix E of this report) - DMP (Appendix E of this report) - Overarching EMS document incorporating the CAP. Of the 21 key actions of the operational EMS in Appendix G, the following items were found: - 20 were compliant. - One is N/A.	Compliant (C)
709:P2	Construction Activities	Prepare a Construction Management Plan, which will include: a. management of noise and dust impacts. b. minimising visual impacts. c. provision of fencing, appropriate storage facilities and locations. d. containment of all earth works to avoid affecting the beach. Note: Advice from SoSB and CALM.	Prepare a Construction Management Plan. Design.	R_002_MS 709 and MS 1067 CAR 2019_12022019	Compliant (completed). This item was assessed as Compliant (completed) in the 2019 CAR.	Compliant (C)/Complete 2019.
					Now DBCA.	
709:P3	Construction Activities	Implement the Construction Management Plan.	Construction.	Implement the Construction Management Plan.	Tputt putt construction during the audit period - CMP assessed.	Not applicable (NA)
		Note: Advice from SoSB and CALM.			Now DBCA.	
709:P4	Aboriginal Heritage and Culture	Undertake an ethnographic and archaeological survey of the proposed wastewater treatment plant site before construction occurs. If any Aboriginal material is uncovered as a result of earthmoving activities work will immediately cease in that area and the discovery will be reported to the relevant authorities. Project personnel and construction workers will be informed of the requirement of the <i>Aboriginal Heritage Act 1972</i> with regards to interference with Aboriginal sites. Note: Advice from DIA.	Prior to construction	Ethnographic and archaeological survey R_002_MS 709 and MS 1067 CAR 2019_12022019	This item was assessed as Compliant (Completed) in the 2020 CAR.	Compliant (C)/complete 2020.
			Construction			
			Induction	R_003_MS 709 and MS 1067 CAR 2020_11022020		
					Now DPLH.	
919:M4.1	Time Limit of Authorisation	The proponent shall not commence implementation of the proposal after the expiration of 5 years from the date of this statement, and any commencement, within this 5 year period, must be substantial.	Substantially commence the Proposal within 5 years of the date of this Statement, or the approval granted in this Statement shall lapse and become void. By 17 December 2017.	R_002_MS 709 and MS 1067 CAR 2019_12022019	This item was assessed as Compliant (Completed) in the 2019 CAR.	Compliant (C)/complete 2019.
919:M4.2	Time Limit of Authorisation	Any commencement of implementation of the proposal, within 5 years from the date of this statement, must be demonstrated as substantial by providing the CEO with written evidence, on or before the expiration of 5 years from the date of this statement.	Design - Prior to 17 December 2017	Notify the CEO in writing of substantial commencement prior to the 5 year time limit from the date of this statement.R_002_MS 709 and MS 1067 CAR 2019_12022019	This item was assessed as Compliant (Completed) in the 2019 CAR.	Compliant (C)/complete 2019.



Appendix C Conformance with Schedule 1, Attachment 1 – Location and authorised extent of project elements

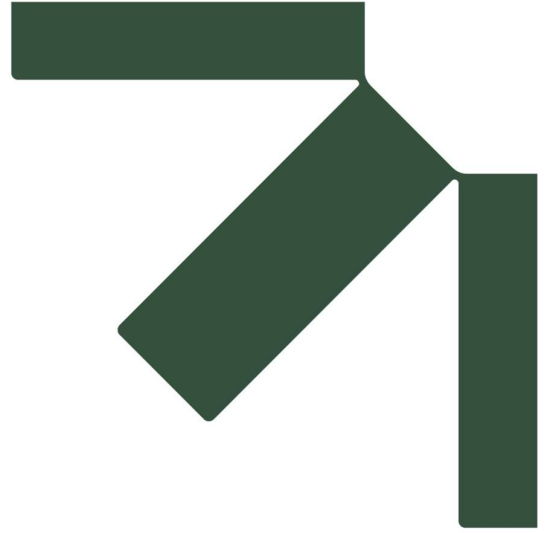
Appendix C Conformance with Schedule 1, Attachment 1 – Location and authorised extent of project elements

Element	Location	Previously Authorised Extent	Authorised Extent	Status	Further Information
Proposal Development Envelope	Figure 1	[new element]	18.2 ha	Compliant (C)	Recent aerial and project boundary.
Resort and Accommodation Facilities	Figure 1	Up to 3.1 ha resort expansion area	Up to 9.21 ha within the Proposal Development Envelope (includes 3.81 ha existing facilities)	Compliant (C)	Development envelope area
		Up to 2.3 ha staff accommodation area			Resort expansion and staff accommodation area is 18.15 ha
Wastewater Treatment Plant Area	Figure 1	Up to 0.36 hectares (total area).	Up to 4.39 ha within the Proposal Development Envelope (includes existing infrastructure)	Compliant (C)	Development envelope area
		Existing ponds used for storing treated effluent and sludge.			Wastewater Treatment area is 4.314 ha
Temporary Borrow Pits for Construction	Figure 1	[new element]	Up to 3.14 ha within the Proposal Development Envelope	Compliant (C)	Development envelope area
Resort Capacity		[new element]	Overnight guest accommodation for 1200 people	Compliant (C)	Borrow pit area is 3.11 ha Monkey Mia's accommodation licence is for 1200
Vegetation Clearing	Figure 1 (Within Proposal Development Envelope)	Up to 3.1 hectares of White Coastal Sandplain Vegetation (Resort Expansion) Up to 2.3 hectares of White Coastal Sandplain Vegetation (Staff Accommodation)	Up to 5.4 ha White Coastal Sandplain Vegetation	Compliant (C)	Cleared white coastal sandplain vegetation is 4.61 ha
		Up to 0.09 hectares of Red Coastal Sandplain vegetation, adjacent to cleared area for the existing wastewater treatment plant	Up to 6.13 ha Red Coastal Sandplain (Pindan) Vegetation		Cleared red coastal sandplain vegetation is 6.12 ha
Major components		<ul style="list-style-type: none"> expansion of the existing resort area provision of staff accommodation facilities upgrading of the existing wastewater treatment plant using a Membrane Bioreactor Package Plant 	Removed – described in Table 1		
Resort Expansion Area		Up to 3.1 hectares	[consolidated into 'Resort and Accommodation Facilities' element above]		
Staff Accommodation Area		Up to 2.3 hectares	[consolidated into 'Resort and Accommodation Facilities' element above]		
Function Rooms		one	[consolidated into 'Resort and Accommodation Facilities' element above]		
Two storey development		Approximately one third of the resort	[consolidated into 'Resort and Accommodation Facilities' element above]		
Hotel Suites		Up to 100 (total)	[consolidated into 'Resort Capacity' element above]		
Bungalows		Up to 30 (total)	[consolidated into 'Resort Capacity' element above]		
Budget Accommodation		Up to 120 bed (total)	[consolidated into 'Resort Capacity' element above]		
Motel units		Up to 70 (total)	[consolidated into 'Resort Capacity' element above]		
Caravan Lots		Up to 71 (total)	[consolidated into 'Resort Capacity' element above]		
Camping Area		Up to 4400 square meters (total) (accommodating approximately 260 people)	[consolidated into 'Resort Capacity' element and area included in 'Resort and Accommodation Facilities' element above]		
Tennis Courts		Three (total)	Removed as not a significant key characteristic relevant to the environment, and area included in 'Resort and Accommodation Facilities' element		
Swimming Pool		6 metre pool and spa (self-contained)	Removed as not a significant key characteristic relevant to the environment, and area included in 'Resort and Accommodation Facilities' element		
Manager's Residence		one	Removed as not a significant key characteristic relevant to the environment, and area included in 'Resort and Accommodation Facilities' element		
Parking		Provision for approximately 200 cars and 2 buses within resort Provision for approximately 55 cars and 24 boat/trailer bays within staff accommodation area	Removed as not a significant key characteristic relevant to the environment, and area included in 'Resort and Accommodation Facilities' element		
Construction		No pindan sand will be transported to the beach adjacent to the resort and expansion area	No pindan sand will be transported to the beach adjacent to the resort and expansion area.	Compliant (C)	Noted.
Suites		Up to 36	[consolidated into 'Resort Capacity' element above]		
Caravan park sites		Up to 24	[consolidated into 'Resort Capacity' element above]		
Swimming Pool		Up to 100 square metre pool (self-contained)	Removed as not a significant key characteristic relevant to the environment, and area included in 'Resort and Accommodation Facilities' element		
Membrane bioreactor package plant		Up to 0.36 hectares (total area) Existing ponds used for storing treated effluent and sludge	[consolidated into 'Wastewater Treatment Plant Area' element above]		



Appendix D Conformance with the Drainage Management Plan

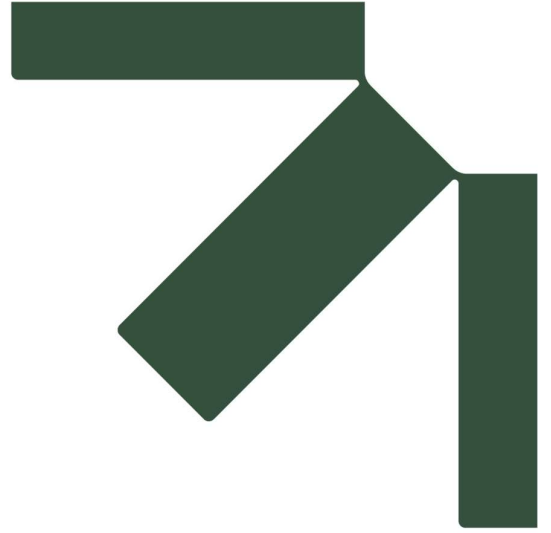
Appendix D Conformance with the Drainage Management Plan						
Audit Code	Requirement	Timing	Evidence	Auditor Comment	2024 Audit	Compliance Status at the Time of the Audit
DMP 1	Maintain unsealed areas such as grassed camping areas and unsealed car parks to contain and infiltrate significant stormwater flows.	During operation - post construction phase	Audit 2024	The unsealed camping areas are turfed and managed accordingly by the onsite gardener, this includes:	No new lawn or car park areas	Compliant (C)
				· regular watering		
				· monthly moisture readings		
				· mowing and general maintenance.		
				Furthermore, carparks and roadways are sealed with a top layer of shell grit, which is topped up as required based on monthly visual inspections and/or prompted after a heavy rainfall event. Refer photos Appendix I.	Correct	
DMP 2	Direct stormwater flows from roofs, roads, access ways and other impervious surfaces to areas that are unsealed to enable infiltration close to source.	During operation	Audit 2024	Stormwater drainage is built into the infiltration swale landscaped areas.	Refer photo s	Compliant (C)
			Monkey Mia Resort management advice			
DMP 3	Maintain pollutant removal devices (i.e. oil, sediment and gross pollutant traps) to any outlet and overflow structure.	During operation	Audit 2024	Pollution removal devices are well maintained and are visually inspections monthly. Bi-annual inspections and operation of equipment also takes place to ensure all is functioning as it should.	Photos of device	Compliant (C)
DMP 4	Ensure chemical and fuel storage areas are bunded.	During operation	Audit 2024	A site audit undertaken on the 17th-20th February 2025 which confirmed that chemical and fuel storage areas/containers are bunded.	Housekeeping has been discussed with the site which was the subject to a dangerous goods audit.	Compliant (C)
			Chemical storage area	Chemicals such as barbecue and housekeeping cleaners are stored in a shed with hard stand floor.	Dangerous Goods Audit undertaken and not covered as part of this audit.	
DMP 5	'Cyclone Management Plan' to include protocols to reduce the stormwater impacts from cyclonic rainfall. Protocols will include inspections of the stormwater containment system and the site to prevent discharge.	During operation	Audit 2024	Average rainfall is 200 mm/yr. Stormwater infrastructure, such as earth swales and drainage areas, were installed during construction after a 50-year rainfall event occurred.	CMP updated in November 2024 with the EMP.	Compliant (C)
			Monkey Mia Resort management advice	Inspections during that rainfall event were conducted.	No fires of late (test jacking pumps and checks to fire truck).	
				The stormwater was retained on site and did not go into the native vegetation adjacent to the beach. Hardstand areas are kept to a minimum to ensure stormwater infiltrates.		
DMP 6	Remove sediment and debris from manholes/interceptor pits.	During operation	Audit 2024	All drains/manholes are well maintained, and monthly inspections are undertaken by the maintenance team. These inspections are managed via the internal task system on the company's intranet system.		Compliant (C)
DMP 7	Induct all visitors to the resort on arrival of the stormwater protocols.	During operation - prior to visitors on site	Monkey Mia Compendium	Visitor information sheets have been updated during the reporting period to include all necessary protocols related to stormwater. Links to all management plans are provided on the RAC Monkey Mia website	Visitor information sheets available	Compliant (C)
DMP 8	Provide educational material in each accommodation unit/room outlining the stormwater system.	During operation	Refer to DMP 7	Refer to DMP 7.		Compliant (C)
DMP M1	Inspections of the stormwater system demonstrate that sediment and debris is not present.	During operation	Audit 2024	Stormwater structures are well maintained, have bne planted and are regenerating (refer photos Appendix I). The stormwater swales are inspected on a monthly basis and completion checks are undertaken to check for washouts and to confirm sediment and debris are not present.		Compliant (C)
			Monkey Mia Resort management advice			
			Management advice received during site audit.			
			C_008_FW__EXTERNAL__RE_ RAC Ops team outstanding evidence			
DMP M2	Inspections of chemical and fuel storage areas demonstrate that no spills/leaks have occurred.	During operation	C_011_MMDR_Re_Monkey Mia Management Responses	The Dangerous Goods storage areas are inspected on a bi-annual schedule. There were no incidents of any spills during the audit period.	Dangerous goods audit found that the brushwood required an upgrade to a non flammable vapour barrier.	Compliant (C)
			Audit 2024			
			201104_Monkey Mia Resort management advice			
DMP CA1	Sediment and/or debris present in the stormwater system	During operation	C_008_FW__EXTERNAL__RE_ RAC Ops team outstanding evidence			Compliant (C)
DMP CA2	Spills and/or loss of containment has occurred at the chemical/fuel storage area	During operation	Refer to DMP M1.	Refer to DMP M1.		Compliant (C)
			Refer to DMP M2.	Refer to DMP M2.		Compliant (C)



Appendix E Conformance with the Nutrient and Irrigation Management Plan

Appendix E Conformance with the Nutrient and Irrigation Management Plan					
Audit Code	Requirement	Timing	Evidence	Auditor Comment	Compliance Status at the Time of the Audit
NIMP 1	Design, install and test the irrigation system to prevent water logging and erosion.	During construction	N/A	The irrigation system is supplied from the artesian bore and has been designed, installed and tested to prevent water logging and erosion.	Compliant (C)
NIMP 2	Use a probe (or other device) for measuring soil moisture content to ensure over-irrigation does not occur.	During operation	Audit 2023	Irrigation effectiveness is visually measured to ensure over-irrigation does not occur	Compliant (C)
			201104_Monkey Mia Resort management advice C_008_FW_EXTERNAL_RE_RAC Ops team outstanding evidence		
NIMP 3	Cease irrigation prior to and during forecast high rainfall events and when soil field capacity has been reached.	During operation	Audit 2023 201104_Monkey Mia Resort management advice	Irrigation effectiveness is visually measured to ensure over-irrigation does not occur	Compliant (C)
NIMP 4	Schedule irrigation based on soil moisture level, plant requirements (lawn and native plantings), weather conditions, evaporation and transpiration rates.	During operation	Audit 2023 201104_Monkey Mia Resort management advice C_008_FW_EXTERNAL_RE_RAC Ops team outstanding evidence	Irrigation is scheduled and monitored to ensure over-irrigation does not occur	Compliant (C)
NIMP 5	Landscaped areas (open space and streetscapes) to be planted with hardy coastal species needing low nutrients and water, as agreed by the Shire of Shark Bay.	Prior to operation	Audit 2023 201104_Monkey Mia Resort management advice	Landscaping was undertaken in 2023 with hardy coastal species needing low nutrients and water. No new landscaping	Compliant (C)
NIMP 6	Turfed areas to be planted using a grass species with:	Prior to operation	R_002_MS 709 and MS 1067 CAR 2019_12022019	Turfed areas were planted with a mix of Velvetreen and Santa Ana grass, complying with the criteria required (CAR 2019). Based on the timing of this action and the report being in an operational phase, the auditors have assessed this item as Conformant (Complete).	Compliant (C)/Complete
	• high salt tolerance				
	• low water requirements				
	• low nutrient requirements				
	as agreed by the Shire of Shark Bay.				
NIMP 7	Fertiliser application loading rates will be determined and provided to the OEPA once master planning for the resort has been finalised and final areas (m ²) of lawn and native planting are known.	After planting	D_001_MMDR_Ministerial Compliance Summary_06012020	Planting of vegetation was completed during the audit period for the putt putt and play area. Fertiliser application rates apply to hardy coastal species needing low nutrients and water.	Compliant (c)
			C_009_MMDR_MMDR Management advice CAR_31012020		
NIMP 8	Slow release fertiliser will be applied in accordance with the nutrient loading rates	During operation	Management advice received during site audit	Fertiliser application rates are in accordance with Total Eden recommendations listed in Appendix D of	Compliant (C)
			R_004 Monkey Mia 2020 site audit		

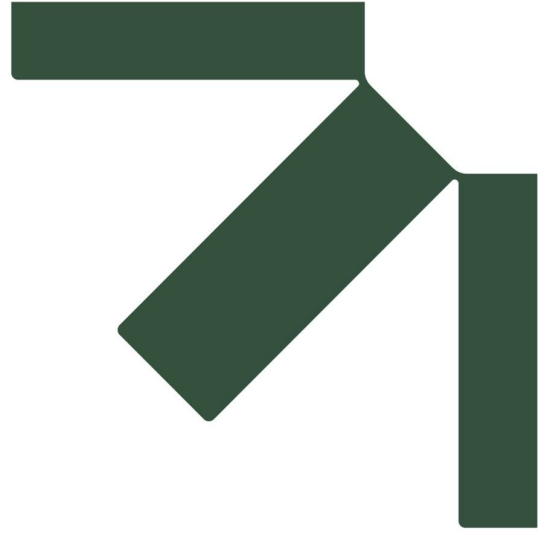
	and manufacturers' instructions.		C_007_RAC Monkey Mia Dolphin Resort - Nutrient and Irrigation MP queries	the NIMP.	
NIMP 9	If required all pesticide and herbicides will be applied according to the manufacturers' specifications.	During operation	C_006_MMDR_Pesticides_3101 2020	Contractors are engaged to apply pesticides and herbicides of which occurs in accordance with safety data sheets and treatment certificates.	Compliant (C)
NIMP 10	Fertiliser, pesticide and herbicides will not be applied to waterlogged soil.	During operation	Audit 2022 201104_Monkey Mia Resort management advice C_008_FW_EXTERNAL_RE_RAC Ops team outstanding evidence	Evaporation rates in the region are high and waterlogging is unlikely to occur, nevertheless, management has noted the requirement not to apply these chemicals to waterlogged soil	Compliant (C)
NIMP 11	Soil nutrients, pH and EC will be assessed to measure the efficiency of applied nutrients and determine whether deficiencies or toxicities are occurring.	During operation	Audit 2022 201104_Monkey Mia Resort management advice C_007_RAC Monkey Mia Dolphin Resort - Nutrient and Irrigation MP queries C_008_FW_EXTERNAL_RE_RAC Ops team outstanding evidence	Groundwater bores are monitored as required for the WWTP and measure soil nutrients and pH. EC is being measured as TDS.	Compliant (C)
NIMP 12	Fertiliser, pesticide and herbicides used on-site will be stored in accordance with the Explosives and Dangerous Goods Act 1961 and requirements outlined in the Material Safety Data Sheets for the products.	During operation	Management advice received during site audit R_004 Monkey Mia 2020 site audit	Roundup and Eco-Prime Purple SF-35 (slow release) fertilizer is being stored on site and are not stored in a volume that is subject to the Explosives and Dangerous Goods Act. If other pesticides and herbicides are required to be used on site, an appropriate contractor will be engaged.	Compliant (C)
NIMP M1	No waterlogging within irrigated areas of the resort	During operation	Audit 2023 201104_Monkey Mia Resort management advice	Evaporation rates on site are high and waterlogging is unlikely to occur. Management advised that there was no incidence of waterlogging during the audit period.	Compliant (C)
NIMP M2	No waterlogging within irrigated areas of the resort	During operation	Refer to NIMP M1	Refer to NIMP M1	Compliant (C)
NIMP M3	No excess application of nutrients from irrigation	During operation	Audit 2023 201104_Monkey Mia Resort management advice	Groundwater bores are monitored for nutrients and the results do not show excess nutrients from irrigation	Compliant (C)
NIMP CA1	Waterlogging in the irrigated areas	During operation	Refer to NIMP M1	Refer to NIMP M1	Compliant (C)
NIMP CA2	Increase in nutrient levels above loading rates	During operation	Audit 2023 201104_Monkey Mia Resort management advice	Groundwater bores are monitored for nutrients and the results do not show excess nutrients from fertilizers.	Compliant (C)



Appendix F Conformance with the Foreshore Management Plan

Appendix F Foreshore Management Plan					
Audit Code	Requirement	Timing	Evidence	Auditor Comment	Compliance Status at the Time of the Audit
FMP 1	Provide formalised pedestrian access paths to the beach.	Prior to operation	R_002_MS 709 and MS 1067 CAR 2019_12022019 R_006_RAC_Guest information and signage_31012020 P_003_Beach access	Access paths to the beach were formalised prior to operation. Beach access is being controlled.	Compliant (C)
FMP 2	If required, undertake revegetation of areas disturbed by Project activities as detailed in the contingency actions in Table 7.	During operation	201104_Site audit 201104_Monkey Mia Resort management advice	Monkey Bar redevelopment and new Putt Putt golf and kids activity area were constructed in April 2021 and the areas restored - refer Plate 14, Appendix I.	Compliant (C)
FMP 3	Install signage and fencing to ensure access to the foreshore is via the designated access tracks and boardwalks.	Prior to operation	R_006_RAC_Guest information and signage_31012020 201104_Site audit P_004_Signage to access foreshore	Access paths to the beach were formalised prior to operation. Signs in place	Compliant (C)
FMP 4	If required, provide limited raised boardwalks at points of entry to the beach (only) that is constructed to specifications agreed by DPaW.	Prior to operation	R_002_MS 709 and MS 1067 CAR 2019_12022019 R_006_RAC_Guest information and signage_31012020	No new raised boardwalks were installed during the audit period. Raised boardwalks were installed in about 2005 prior to this item being a requirement.	Not required at this stage(NR)
FMP 5	Induct all visitors to the resort of the necessity to follow only authorised and signed access routes to the beachfront.	Prior to operation	R_005_RAC_1904_MM_Compendium Update MV NEW ENVIRO 15 R_006_RAC_Guest information and signage_31012020	Monkey Mia management provide several informative pieces to their visitors about the natural environment, including signs on the raised boardwalks about the local fauna. Beach access is specifically covered by the Visitor Information Sheet (R_005). Beach access is clearly shown on a site map located near the camping/caravan area. Beach paths are well defined and it is difficult to access the beach without using designated paths due to fencing, signage and beach vegetation. Despite the site map not being a specific item of visitor induction and does not mention that visitors should only follow authorised beach routes, the auditor believes that the method of communication is appropriate for the facility and clientele.	Compliant (C)
FMP 6	Provide educational material in each accommodation unit/room providing clear details and maps showing access routes from the accommodation to the beachfront.	During operation	R_005_RAC_1904_MM_Compendium Update MV NEW ENVIRO 15 R_006_RAC_Guest information and signage_31012020	Monkey Mia management provide several informative pieces to their visitors about the natural environment, including signs on the raised boardwalks about the local fauna. Beach access is specifically covered by the Visitor Information Sheet (R_005). Beach access is clearly shown on a site map located near the camping/caravan area and is mentioned in the room/unit information. Beach paths are well defined and it is difficult to access the beach without using designated paths due to fencing, signage and beach vegetation. Despite the site map not being a specific item of visitor induction and does not mention that visitors should only follow authorised beach routes, the auditor believes that the method of communication is appropriate for the facility and clientele.	Compliant (C)
FMP 7	Induct all visitors to the resort of the necessity to follow resort waste disposal protocols.	During operation	R_005_RAC_1904_MM_Compendium Update MV NEW ENVIRO 15 R_006_RAC_Guest information and signage_31012020	Waste disposal protocols are stated in the Visitor Information sheet (R_005) in each room, and waste facilities are shown on the site map in the camping/caravan area.	Compliant (C)

FMP 8	Provide educational material in each accommodation unit/room outlining the waste disposal protocols including:	Prior to operation	R_005_RAC_1904_MM_Compendium Update MV NEW ENVIRO 15	The visitor information sheets (R_005) contain information specifically pertaining to waste disposal protocols. These have been provided in each accommodation unit.	Compliant (C)/Complete
	• all rubbish (cans, bottles, plastics, paper) to be returned to the resort for disposal				
	• no rubbish to be dumped or left on the foreshore areas.		R_006_RAC_Guest information and signage_31012020		
			201104_Monkey Mia Resort management advice		
FMP M1	No erosional features within the foreshore area adjacent to the resort.	During operation	201104_Site audit	No erosional features were evident during audit period.	Compliant (C)/Complete
			201104_Monkey Mia Resort management advice		
			C_008_FW__EXTERNAL__RE_RAC Ops team outstanding evidence		
			P_005_access paths to foreshore		
FMP M2	No loss of vegetation within the foreshore area due to impacts from Project activities	During operation	P_006_foreshore area	No loss of vegetation within the foreshore area was evident during the audit period.	Compliant (C)
			201104_Site audit		
			201104_Monkey Mia Resort management advice		
			P_007_foreshore imagery_300119		
FMP M3	The beach is free of rubbish	During operation	201104_Site audit	Weekly housekeeping and rubbish removal tasks are implemented to ensure the beach remains free from rubbish.	Compliant (C)
			P_006_foreshore area		
FMP CA1	Erosion within the foreshore area adjacent to the resort	During operation	Refer to FMP M1	Refer to FMP M1	Compliant (C)
FMP CA2	Loss of terrestrial vegetation within the foreshore area due to impacts from Project activities	During operation	Refer to FMP M2	Refer to FMP M2	Compliant (C)
FMP CA3	Rubbish observed in foreshore areas	During operation	Refer to FMP M3	Refer to FMP M3	Compliant (C)



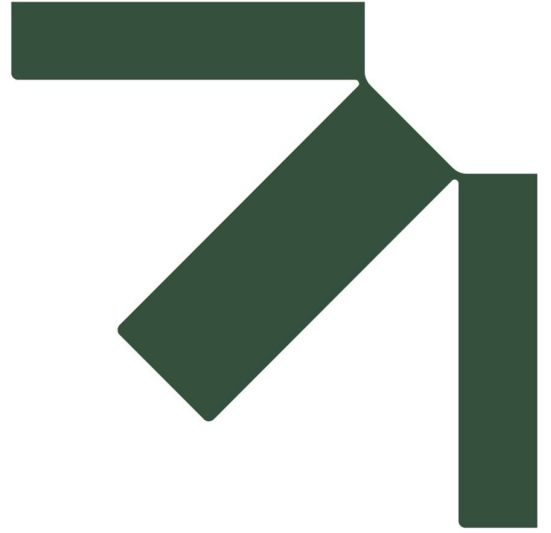
Appendix G Conformance with the Environmental Management System

Appendix G Conformance with the Environmental Management System

Audit Code	Requirement		Report	Evidence	Compliance Status at the Time of the Audit
EMS 1	Initial induction before commencement of construction and operational activities	Prior to construction, prior to operation.	RAC Sharepoint MMDR Induction	A Monkey Mia Dolphin Resort Induction is conducted for all contractors and staff members prior to commencement of construction and/or operational activities. Form/risk assessment is completed to identify the level of risk of the activities for each contractor	Compliant (C)
EMS 2	Regular site management meetings where the environment is part of the agenda	During operation	HSE Risk Register HSE Risk Meetings Monthly	Weekly management meetings and monthly safety meeting. Covers day to day issues and discussions and regularly includes environmental. RAC GM meets with DBCA manager.	Compliant (C)
EMS 3	Quarterly progress reports on implementation of environmental management measures	During operation	Tasks are set in Newbook (Reservation System) which has the environmental checklist. Reporting is notified ahead of time and when it is due. Report by exception in system.	There was no evidence of quarterly progress reports -which include details on implementation of environmental management measures. The site has set up quarterly reporting checklists which will assist reporting in 2022 forward.	Compliant (C)
EMS 4	Review and implementation of annual environmental reports.	During operation	MS 709 and MS 1067 CAR MonkeyMiaWWTP Annual Environmental Report	Previous environmental compliance audit reports and annual environmental reports from the WWTP (Conexa 2024).	Compliant (C)
EMS 5	Raising awareness of visitors, guests and the community about important environmental values of Monkey Mia through, for example, educational signage and brochures	During operation	RAC Guest information and signage Compendium Update (Guest Information Sheet) QR code when you check on and on movie channel. Back of the amp.	Monkey Mia management provide several informative pieces (signs, information sheets etc) to their visitors about the natural environment, including signs on the raised boardwalks and within the reception area about the local fauna. Refer Appendix H guest information sheet issued with the site map.	Compliant (C)
EMS 6	All external communication must be endorsed for release by the RAC GM	During operation	Site audit Monkey Mia Resort management advice	A procedure regarding external communication outlines that it must be endorsed by the RAC GM or their delegate.	Compliant (C)
EMS 7	A register of documents and records, manuals, information and education packages, registers, forms and external documents relevant to the EMS are to be kept	During operation	Management Advice received during site audit Monkey Mia site audits	The Monkey Mia Site Manager has a register of documents that covers environmental management	Compliant (C)
EMS 8	In the event of an environmental incident, the person responsible will implement the Environmental Incident Reporting Procedure	During operation	SOLV Reporting - Incident Management Procedure (HSE) - near misses, hazard reports and targets. Includes environment. Example MMDR Induction	The site inductions include details on the requirement to report incidents in accordance with the Incident Management Procedure.	Compliant (C)
EMS 9	An Environmental Training Program will be developed and delivered by RAC to all site personnel and construction contractors associated with the Project	During operation	Site audit Monkey Mia ENV Awareness Training	An induction on all environmental requirements is communicated via the payroll system (Deputy). Communication channel. 631 training modules available at RAC.	Compliant (C)
EMS 10	All employees and contractors will receive environmental training, to ensure they are aware of their responsibilities and	During operation	Site audit Monkey Mia ENV Awareness Training	An induction on all environmental requirements is communicated via the payroll system (Deputy). Communication	Compliant (C)

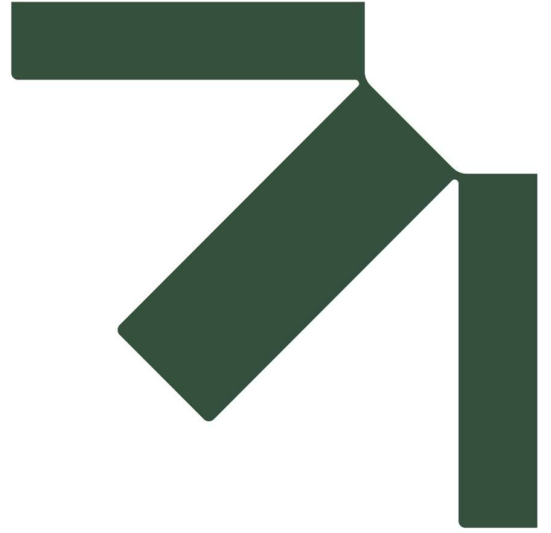
EMS 10	are competent to carry out their work in an environmentally acceptable manner	During operation		Communicated via the payroll system (Deputy). Communication channel. 631 training modules available at RAC.	Compliant (C)
EMS 11	RAC will ensure all staff and supervisory personnel performing duties required by this EMS are briefed on the environmental impacts and obligations associated with the Project including:	During operation	Induction	All staff are required to complete the site-specific induction which includes details on clearing, heritage and maintenance of visual amenity. Mandatory training for staff includes – Alcohol and Drugs, Anti money laundering, Fitness for work and Inclusive and respectful Behaviour and Chemical awareness training. Site Manager can assign learning to any staff and the ones that lean towards and environmental aspect are – Asbestos Awareness Training, Accurate Incident reporting, Basic Chemical awareness, Chief Fire warden, Contractor safety, MMDR Potable water training, SWP – Liquid spills, SWP working with Chemicals, Critical control verification. These are completed monthly.	Compliant (C)
	• Impacts of clearing		Monkey Mia ENV Awareness Training		
	• Aboriginal heritage				
	• Maintenance of visual amenity				
EMS 12	RAC will ensure all staff and supervisory personnel performing duties required by this EMS are briefed on the environmental impacts and obligations associated with the Project including:	Prior to construction	N/A	Given the construction timing of this item, the auditor has assessed this action as 'Not Applicable.'	Not required at this stage (NR)
	• Direct and indirect impacts from construction activities on adjacent areas including the coastal foreshore; and on groundwater and marine water quality				
EMS 13	Where specific competencies for specific roles have been identified, RAC will ensure that personnel employed for these roles have the appropriate training	During operation	MMDR Management advice CAR	The Money Mia Dolphin Resort Site Manager has received appropriate environmental training including water monitoring, horticultural and technical laboratory training.	Compliant (C)
			Monkey Mia Resort management advice	Other personnel are reviewed for environmental competencies prior to undertaking environmental roles.	
EMS 14	RAC will ensure its contractors are aware of all relevant environmental requirements prior to contracting	During operation	MS 709 and MS 1067 CAR	Strategen-JBS&G prepared an Environment Procurement Plan for RAC to assist contractors to be aware of their responsibilities relating to MS 709 and MS 919. The Environmental Procurement Plan assists the management of implementation of environmental obligations through the construction supply chain.	Compliant (C)
EMS 15	RAC GM shall review the EMS annually to ensure its continuing suitability, adequacy and effectiveness	During operation	MS 709 and MS 1067 CAR	A delegate of the RAC GM will review this audit report (which contains a summary of the EMS) to ensure its ongoing suitability to the project.	Compliant (C)
EMS 16	Performance reporting will be implemented to produce systematic, comprehensive and informative reports on the environmental management and monitoring activities during the construction/operation period of the Project	During operation	MS 709 and MS 1067 CAR	This annual audit report (and previous audit reports) will provide a comprehensive review of the adequate environmental management practices of the project.	Compliant (C)
EMS 17	Submit an Annual Environmental Report (AER) that details the monitoring data collected from 1 April to 31 March	During operation	MonkeyMiaWWTP Annual Environmental Report	The WWTP monitoring data is in the AER submitted to the DWER.	Compliant (C)
EMS 18	An annual audit will be undertaken of the Project by a suitably qualified person	During operation	MS 709 and MS 1067 CAR	The previous annual audit report was prepared by a qualified auditor and submitted prior to the current audit period, as	Compliant (C)

	qualified auditor			required by the previous ministerial statements.	
EMS 19	RAC will establish and maintain a system of records (Project Complaints Register) to fully document complaint handling	During operation	MMDR Management advice. Qualtrix is where the feedback is captured. RAC Member Relations includes any complaints that impact beyond MMDR. Examples.	Complaint handling is systematically managed at Monkey Mia Dolphin Resort. There are several forums where visitors can provide feedback to RAC, and RAC can respond.	Compliant (C)
EMS 20	This complaints procedure will be reviewed annually throughout the duration of the construction and operation phases of the Project	During operation	Management advice	The complaints procedure is reviewed more frequently than annually. This is managed by a team of people in Member Relations.	Compliant (C)
EMS 21	The EMS will be reviewed annually during construction and operation phases of the Project	During operation	MS 709 and MS 1067 CAR	This annual audit report will provide an annual review of the EMS.	Compliant (C)



Appendix H Evidence

-  2.0 Appendix H Guest information.pdf
-  3.0 Appendix H Training Modules.docx
-  3.0 Appendix H Training Modules.pdf
-  4.0 RAC AACR Form 2023-24.pdf
-  5.0 HODS 04012024.pdf
-  6.0 Grease Trap Pump Out Invoice 4191_001.pdf
-  7.0 H&S MEETING 01.07.2024.pdf
-  8.0 Site HODS Meeting 100723.pdf
-  9.0 Wren Oil Disposal Invoice180905.pdf
-  10.0 Monkey Mia - full compendium.pdf
-  11.0 RAC_HazardReview_20250220_121151.pdf
-  12.0 RAC_HazardReview_20250220_121510.pdf
-  13.0 RAC_IncidentReview_20250220_121407.pdf
-  14.0 RAC_IncidentReview_20250220_121436.pdf
-  15.0 MMDR - Environmental Management.docx
-  16.0 MMDR - Environmental Management (in brief) v2.docx
-  17.0 RAC-Monkey-Mia-Dolphin-Resort-Map_Oct_23-1.pdf
-  18.0 Sullage Holding Tank Pump Out Invoice.pdf
-  19.0 SolvSafety - RAC-PRINS-423.pdf
-  20.0 Site System Insights .pdf
-  4665AE_Rev0 Audit Spreadsheet.xlsx
-  Appendices B-G 2022 Rev 1.xlsx



Appendix I Photos from Audit

Appendix I: Photos From Site Audit February 2025



Plate 1: Power Generation, water and wastewater site – new fence installation.



Plate 2: Used and redundant generator, dongas and sea containers



Plate 3: Water Treatment (RO and UV)



Plate 4: Wastewater Treatment Plant – Biological Reaction Process with Ultrafiltration Membrane System



Plate 5: Wastewater Treatment Plant and Infiltration Swale from RO Plant (up to 35 m³/day)



Plate 6: Wastewater Treatment Ponds (used for Waste Activated Sludge)



Plate 7: Wastewater Treatment Plant



Plate 8: Wastewater Treatment Plant (sodium Hydroxide Intermediate Bulk Container (IBC))



Plate 9: Diesel Generators for Site



Plate 10: Generators - Electrical Control Room



Plate 11: Fill Adjacent Borrow Pit site



Plate 12: Remnants from Goat Traps



Plate 13: Wild Goats



Plate 14: Stand Pipe/Bore



Plate 15: Containers for Change Collection Bins



Plate 16: Gas Bullets



Plate 17: Bore Water Tank



Plate 18: Waste Cooking Oil Storage for Transport Offsite



Plate 19: Refueling Bays and Recycling Bins



Plate 20: Dump Point for Caravans



Plate 21: Fire Break to the West



Plate 22: Foreshore Area and Native Emu's

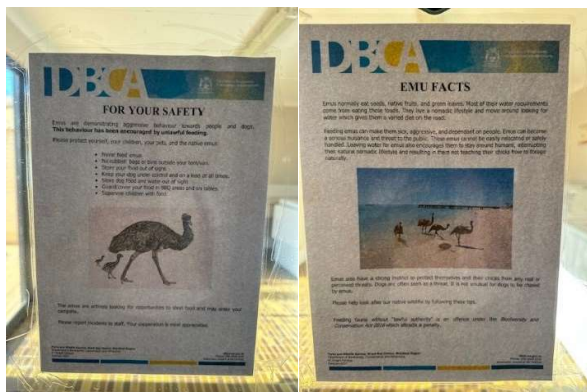


Plate 23: DBCA Emu Fact Sheets



Plate 23: Foreshore



Plate 24: Dedicated Foreshore Access



Plate 25: DBCA Dolphin Experience



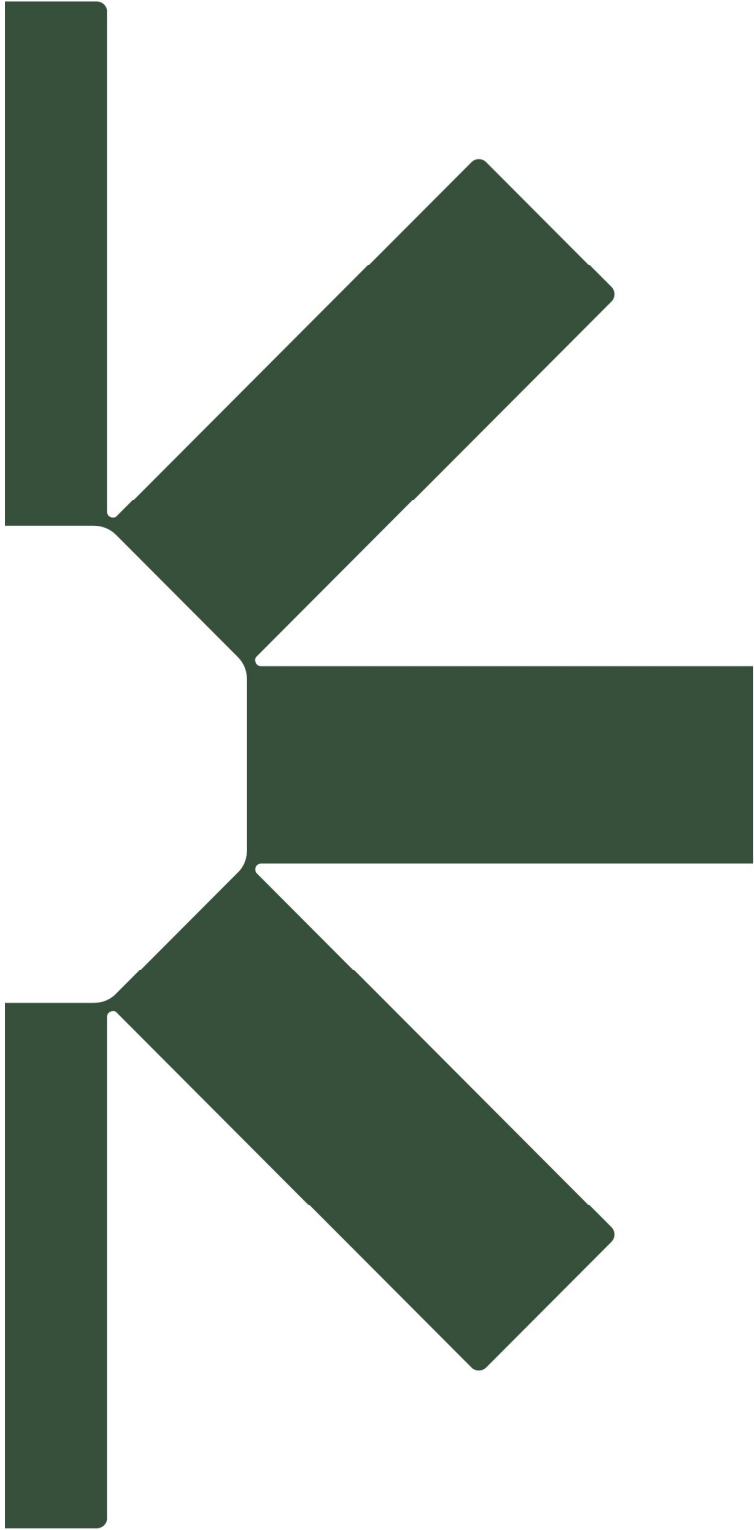
Plate 26: Stormwater Swale



Plate 27: Research Facility – Georgetown University



Plate 28: Research Facility – University of Zurich



Making Sustainability Happen