



PERFORMANCE AND COMPLIANCE REPORT

INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

JULY 2021 – JUNE 2022

June 2023



Department of Finance

PERFORMANCE AND COMPLIANCE REPORT

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Prepared by Aurora Environmental

June 2023

SUMMARY

This Performance and Compliance Report (PCR) summarises the compliance of the operation of the Intractable Waste Disposal Facility (IWDF), Mt Walton East, against Ministerial Statement No. 562, Australian Safeguards and Non-Proliferation Office (ASNO) permit, Radiological Council (RCWA) registration, Department of Water and Environmental Regulation (DWER) licence and associated management plans and other system requirements for the period 1 July 2021 to 30 June 2022.

This report demonstrates that the operation of the IWDF between 1 July 2021 and 30 June 2022 complied, where applicable, with one exception (being the frequency of Community Liaison Committee meetings), with the requirements of Ministerial Statement No. 562, ASNO Permits, DWER Licence, RCWA Registration and the IWDF Environmental, Health and Safety and Quality Management Systems (EHSQMS) and Management Plans (EHSQMP).

No disposal operations were undertaken during the reporting period.

Ongoing management and monitoring activities were undertaken, including groundwater, routine site inspections, liaison with the community and continual review and update of the EHSQMS for the IWDF.

Enquiries regarding this PCR should be emailed to IWDF-MountWalton@finance.wa.gov.au.

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LIST OF ACRONYMS, INITIALISATIONS AND GLOSSARY

ARPANSA	Australian Radiation Protection and Nuclear Safety Agency
ASNO	Australian Safeguards and Non-Proliferation Office (ASNO), located within the Federal Department of Foreign Affairs and Trade portfolio.
CLC	IWDF Community Liaison Committee
DER	Department of Environment Regulation, now the Department of Water and Environmental Regulation
DWER	Department of Water and Environmental Regulation, previously Department of Environment Regulation
EPA	Environmental Protection Authority (Western Australia)
EHSQMS	Environmental, Health and Safety, and Quality Management Systems
EHSRMP	Environmental, Health and Safety and Radiation Management Plans
Finance	Department of Finance - The Department of Finance is the Government agency responsible for assisting the Minister for Works in the administration of the <i>Public Works Act 1902</i> (WA).
FMC	Facility Management Contractor
Intractable Waste	Waste that is a management problem by virtue of its toxicity or chemical or physical characteristics which make it difficult to dispose or treat safely (Landfill Waste Classifications and Waste Definitions 1996 (as amended December 2019, Western Australia: DWER, 2019)
IWDF	Intractable Waste Disposal Facility, located at Mt Walton East, Western Australia
PCR	Performance and Compliance Report
RCWA	Radiological Council Western Australia
RSO	Radiation Safety Officer

1. INTRODUCTION

1.1 IWDF Overview

The Intractable Waste Disposal Facility (IWDF) at Mt Walton East was established in the early 1990s and is owned by the Western Australian Government. The IWDF is Australia's first long-term disposal site for intractable waste and is only to be used for intractable waste generated in Western Australia, for which there is no other viable management option.

The IWDF has environmental approval for the disposal of a range of materials containing intractable chemical compounds or low to medium level radioactive waste.

1.2 Location of the IWDF

The IWDF is approximately 475 kilometres north-east of Perth and is located on 25 square kilometres of Crown Reserve Land, within the Shire of Coolgardie (Figure 1). Access to the site is by a one-hundred-kilometre unsurfaced road that extends northward from Boorabbin siding on Great Eastern Highway.

1.3 Purpose of Document

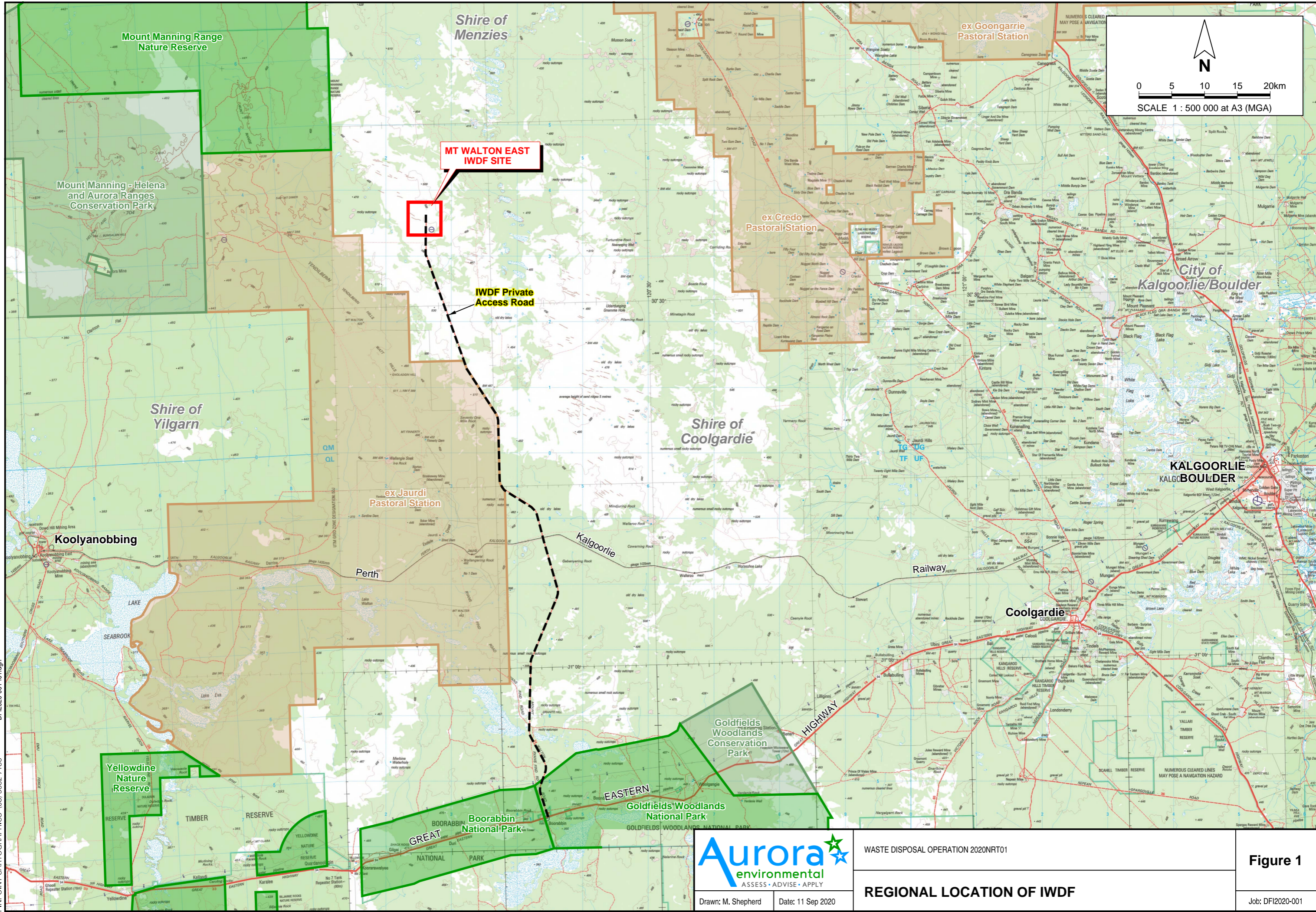
This Performance and Compliance Report (PCR) summarises the compliance of the operation of the IWDF against the requirements of:

- Ministerial Statement No. 562 (Appendix A).
- Radiological Council of Western Australia (RCWA) Registration RS 13/2011 20590 (Appendix B).
- Department of Environment Regulation (DER) Licence L8190/2007/1 (Appendix C).
- Australian Safeguards and Non-proliferation Office (ASNO) Permit PN207 (Appendix D).
- IWDF Management Plans (Appendix E).
- IWDF Environmental, Health and Safety and Quality Management System (EHSQMS) procedures and other documents.
- IWDF Environmental, Health and Safety and Radiation Management Plans (EHSRMP)

In particular, the PCR has been prepared to fulfil the requirements of the IWDF EHSQMS, which requires the preparation of an annual PCR.

1.4 Disposal Operations

No disposal operations were conducted during the reporting period.



DF12020-001-01.dgn
 PINPOINT CARTOGRAPHICS (08) 9562 7136



Drawn: M. Shepherd Date: 11 Sep 2020

WASTE DISPOSAL OPERATION 2020NRT01

REGIONAL LOCATION OF IWDF

Figure 1

Job: DF12020-001

2. MANAGEMENT OF THE IWDF

2.1 Proponent

From 1 July 2021 to the 20 January 2022, the proponent for the IWDF was the Department of Finance, Building Management and Works (Finance). From the 21 January 2022 to 30 June 2022 the proponent for the IWDF was the Minister for Works care of the Department of Finance.

On the 13 October 2021, Finance submitted a request to the Registrar of the Department of Water and Environmental Regulation (DWER) to change the nominated proponent for the IWDF under Section 38(6a) of the *Environmental Protection Act 1986*.

Finance requested to change the nominated proponent on Ministerial Statement 562 (Intractable Waste Disposal Facility, Mt Walton East), from the Department of Finance, Building Management and Works to the Minister for Works care of the Department of Finance.

This change was requested for the following reason:

The Minister for Works is the relevant body corporate with the statutory authority, as an agent of the Crown in right of the State, to carry out the functions relevant to the requirements of the Ministerial Statement. The Department of Finance is the Government agency responsible for assisting the Minister for Works in the administration of the *Public Works Act 1902* (WA).

On the 21 January 2022, the Minister for Environment issued a Notice of Revocation of a Proponent and Notice of Nomination as Proponent, under Section 38I of the *Environmental Protection Act 1986* approving the change of proponent. The Notice is included as Appendix F.

2.2 Facility Management Contractor

The Facility Management Contractor (FMC) with responsibility for the environmental and operational management of the IWDF for the period 1 July 2021 to 30 June 2022 was Aurora Environmental.

Enquiries regarding this PCR should be emailed to IWDF-MountWalton@finance.wa.gov.au.

2.3 IWDF Governance

The governance of the IWDF from 21 January 2022 to 30 June 2022 is illustrated in Figure 2 below.

Figure 2
January 2022 – June 2022 IWDF Governance Structure



2.4 Visits to the IWDF during the 2021 – 2022 Reporting Period

Table 1 provides a summary of visits to the IWDF during the reporting period.

Table 1
Summary of Visits to the IWDF During 2021 – 2022 Reporting Period

Date of Visit	Purpose of Visit	Personnel & Role
31 Aug – 2 Sept 2021	Installation of signs at the Railway Crossing on the Access Road	Mark Shepherd (FMC Project Director and Operations Manager), Shayne Pittaway (FMC Technician), Josh Morgan (FMC Technician).
22 Sep – 23 Sep 2021	Installation of replacement generator and self-bunded diesel fuel tank	Mark Shepherd (FMC Project Director and Operations Manager), Shayne Pittaway (FMC Technician).
11 Oct – 14 Oct 2021	Facility inspection, IWDF Access Road inspection, rehabilitation, capping, and groundwater monitoring.	Mark Shepherd (FMC Project Director and Operations Manager), Shayne Pittaway (FMC Technician).
13 Oct 2021	Facility inspection by the proponent.	Eleanor Hopkins (Finance IWDF Project Director) and Sze-Wan Ng (Finance IWDF Contract Manager).
4 Apr - 6 Apr 2022	Facility inspection, IWDF Access Road inspection and groundwater monitoring. Plumbing and electrical inspection.	Mark Shepherd (FMC Project Director and Operations Manager); and Shayne Pittaway (FMC Technician). Sam Stott (plumber, Taps Industries Pty Ltd); and Tim Green (electrician, TJ & M Electrical Pty Ltd).

3. REGULATORY INSTRUMENTS APPLIED TO THE IWDF

3.1 DWER Environmental Licence for Prescribed Premises

The IWDF is licensed by the Western Australian Department of Water and Environmental Regulation (DWER) under Part V of the *Environmental Protection Act 1986*, as a Prescribed Premises - Category 66 Class V intractable landfill site. Licence L8190/2007/1 is provided as Appendix C.

It should be noted that as of 1 July 2017 the Department of Environment Regulation (DER) merged with the Department of Water to form the Department of Water and Environmental Regulation (DWER). Licence L8190/2007/1 will not show this change until the licence is renewed.

Licence L8190/2007/1 includes two conditions which are as follows:

1. **Reporting Conditions** - requiring the Licensee to provide an Annual Audit Compliance (AAC) report to the Director of the Environmental Regulation Division by 1 March each year.
2. **Notification of Intention to Dispose** - requiring the Licensee to notify the Director of the Environmental Regulation Division in writing three months prior to the delivery of waste at the IWDF.

The DER Licence L8190/2007/1 (Appendix C) displays an expiry date of 17 February 2017, however on the 29 April 2016 the Director General of the then DER issued a Notice of Amendment of Licence expiry dates, under Section 59(9)(b) and Section 59(1)(k) of the *Environmental Protection Act 1986*, which extended the expiry date of Licence L8190/2007/1 to 17 February 2022. This notice of amendment is also included at Appendix C.

The DWER licence renewal application for the IWDF was submitted to DWER on 16 November 2021. The licence had an original expiry of 17 February 2022, however, given the time DWER required to assess the licence renewal application, DWER proposed to extend the expiry by 6 months to 17 August 2022. Finance accepted the proposed amendment, and the licence expiry date was formally extended on the 9 February 2022.

3.1.1 Compliance Statement

Table 2 below details proponent compliance with Licence L8190/2007/1 Conditions.

Table 2
Environmental Licence L8190/2007/1 2021 - 2022 Compliance Statement

No.	Condition	Compliance Status
1	Reporting Conditions -- requiring the Licensee to provide an Annual Audit Compliance (AAC) report to the	In compliance – the AAC report was submitted to DWER via email

No.	Condition	Compliance Status
	Director of the Environmental Regulation Division by 1st March each year.	on the 1 March 2022 – see Appendix G for AAC report.
2	Notification of Intention to Dispose -- requiring the Licensee to notify the Director of the Environmental Regulation Division in writing three months prior to the delivery of waste at the IWDF.	Not required as a disposal operation did not occur during the reporting period.

3.2 Contaminated Sites Act 2003 IWDF Classification

As of June 2016, the IWDF has been classified as ‘*Contaminated – restricted use*’ under the *Contaminated Sites Act 2003* and is listed on the Contaminated Sites Register.

The inclusion of the IWDF on the Contaminated Sites Register is essential for future generations as it will provide a permanent record regarding the purpose and location of the IWDF.

3.3 Management Orders

Management Orders issued under the *Land Administrations Act 1997* vest the Class C reserves associated with the IWDF (Crown Reserve 42001) and the IWDF Access Road (Crown Reserve 44102) with the Minister for Works.

3.4 Radiological Council Registration

The IWDF is required, under the *Radiation Safety Act 1975*, to be registered with the RCWA as premises in which radioactive substances are used, stored, or manufactured.

The RCWA registration RS 13/2011 20590 for the registration period 10 February 2020 to 8 February 2023, names the registrant as Emma Savage-Jones, Director, Building Management, Department of Finance and Stuart Parr as the RCWA approved RSO for the IWDF.

The RCWA registration is included as Appendix B.

3.4.1 Compliance Statement

Table 3 details Finance’s compliance, for the reporting period, with the conditions, restrictions and limitations as defined on the RCWA Registration RS 13/2011 20590, as issued 10 February 2020.

Table 3
RCWA Registration of Premises 2021 – 2022 Compliance Statement

Conditions, Restrictions and Limitations	Compliance Status / Comment
1. This registration is for the disposal of radioactive waste at the Intractable Waste Disposal Facility (IWDF), Crown Reserve 42001 in accordance with the <i>Radiation Safety Act 1975 (Section 28)</i> .	General information.

Conditions, Restrictions and Limitations	Compliance Status / Comment
<p>2. The Registrant is directed to ensure that -</p> <p>2.1 prior to radioactive waste being accepted for final disposal at the IWDF, a disposal permit must be granted by the Radiological Council in accordance with <i>Section 34 of the Act</i>;</p> <p>2.2 disposals are undertaken in accordance with the <i>Radiation Safety Regulation 1983 and Regulation 31(A) near surface disposal of radioactive waste</i>, as amended;</p> <p>2.3 radiation safety management is undertaken by the appointed <i>Radiation Safety Officer (RSO)</i>, in accordance with his duties under <i>Regulation 19(3)</i>;</p> <p>2.4 all radioactive waste to be disposed of at the IWDF shall be conditioned in accordance with the <i>Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)</i>, <i>Radiation Health Series No 35, National Health and Medical Research Council of Australia 1992</i>;</p> <p>2.5 all radioactive waste to be packaged and transported to the IWDF shall be in accordance with the <i>Radiation Safety (Transport of Radioactive Substances) Regulations 2002</i> and the <i>Code of Practice for the Safe Transport of Radioactive Material (2008)</i> as adopted;</p> <p>2.6 the <i>Radiation Safety Officer (RSO)</i> reports periodically in writing to the Radiological Council, the results of radiation monitoring and other factors relating to human health for the receipt, handling and near surface disposal of radioactive waste; and if there are any changes to the radiation safety management procedures for the IWDF;</p> <p>2.7 accurate records of all radioactive material disposed of at the IWDF shall be maintained and archived in an approved manner, and reported to the Radiological Council, including an updated report after each disposal campaign;</p>	<p>Disposal of radioactive waste did not occur during the reporting period.</p> <p>Disposal of radioactive waste did not occur during the reporting period.</p> <p>In compliance – all radiation safety management was undertaken by the appointed RSO.</p> <p>Disposal of radioactive waste did not occur during the reporting period.</p> <p>Disposal of radioactive waste did not occur during the reporting period.</p> <p>In compliance - no radiation monitoring was required or no disposal of radioactive waste occurred during the reporting period. RCWA were provided with copies of updated radiation safety management procedures and waste acceptance guidelines (1 Nov 2021).</p> <p>In compliance – the Finance R&D Schedule refer to the IWDF records that are to be retained permanently within the State Records Office of Western Australia. See Appendix H for Extract of R&D Schedule. A disposal close-out report has been submitted to the RCWA after each radioactive waste disposal. These reports are listed in the Special Conditions of this table.</p>

Conditions, Restrictions and Limitations	Compliance Status / Comment
<p>2.8 where appropriate, radiation safety is managed in accordance with the following IWDF guidelines, procedures and instructions –</p> <p><i>2.8.1 Disposal of Radioactive Waste at the Intractable Waste Disposal Facility (IWDF) Mt Walton East, Waste Acceptance Guideline and Waste Acceptance Proforma, Government of Western Australia, Department of Finance Building Management and Works, as amended;</i></p> <p><i>2.8.2 IWDF Radiation Procedure RP-01, Radiation Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;</i></p> <p><i>2.8.3 IWDF Operational Procedure OP-04, Waste Preparation for Disposal, Government of Western Australia, Department of Finance Building Management and Works, as amended;</i></p> <p><i>2.8.4 IWDF Operational Procedure OP-05, Waste Loading and Transport, Government of Western Australia, Department of Finance Building Management and Works, as amended;</i></p> <p><i>2.8.5 IWDF Operational Procedure OP-06, Waste Delivery, Acceptance and Disposal, Government of Western Australia, Department of Finance, Building Management and Works, as amended;</i></p> <p><i>2.8.6 IWDF Operational Procedure OP-10, Operation Site Safety Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;</i></p> <p><i>2.8.7 IWDF Operational Instruction OI-01, Waste Inspection, Government of Western Australia, Department of Finance Building Management and Works, as amended.</i></p>	<p>In compliance – although a radioactive waste disposal did not occur, where applicable, aspects of the IWDF guidelines, procedures and instructions were implemented as part of ongoing management of the IWDF.</p> <p>See tables 6, 7, and 8 of this PCR.</p>
<p>SPECIAL CONDITIONS</p> <p>1. Inventory locations of material at Mount Walton East (IWDF) are outlined as follows -</p> <ul style="list-style-type: none"> • 92RS01: Final Report on disposal of low-level radioactive waste at the IWDF east of Mt Walton. Environmental Health Branch • 92RS02: Disposal of second batch of radioactive waste at the IWDF, Mt Walton, Katee Enterprises, July 1994 • 94RT01: Radiological Aspects of the acceptance and burial of CSBP & Farmers Ltd radioactive waste at Mt Walton East, Katee Enterprises, July 1994 	<p>In compliance – all documents listed are specified on the Finance R&D schedule.</p>

Conditions, Restrictions and Limitations	Compliance Status / Comment
<ul style="list-style-type: none"> • 2000RT01: 1999 Annual Radiation Report: Operations of the IWDF Mt Walton East, WM(WA), June 2000 • 2002RT01: 2002 Annual Radiation Report; Operations of the IWDF Mt Walton East, WM(WA) • Report EP2008-154 Performance and Compliance Report: Intractable Waste Disposal Facility Mt Walton East, Coffey Environments, December 2008. 	
<p>2. The full inventory of items buried at the IWDF is to be available on a database maintained by the Registrant.</p>	<p>In compliance – a inventory of all radioactive materials disposed of at the IWDF is available in the IWDF Waste Inventory Database maintained by the Registrant.</p>

3.5 ASNO Permit to Possess Nuclear Material

Australia has enacted the *Nuclear Non-Proliferation (Safeguards) Act 1987* to ensure that international obligations are met under the Nuclear Non-Proliferation Treaty.

ASNO, the department with responsibility for implementing the requirements of the *Nuclear Non-Proliferation (Safeguards) Act 1987* is located within the Federal Department of Foreign Affairs and Trade portfolio.

The *Nuclear Non-Proliferation (Safeguards) Act 1987* is concerned with nuclear materials such as uranium, thorium, and plutonium. As there are small quantities of thorium and uranium disposed of at the IWDF, the facility is required to have a current permit to possess nuclear material.

On the 19 October 2020, pursuant to section 13 of the *Nuclear Non-Proliferation (Safeguards) Act 1987*, the Director General ASNO issued a renewed Class L2 permit, PN207, (including a Compliance Code) which took effect on 30 October 2020.

Permit PN207 (Appendix D) requires Finance to submit to ASNO a report describing approved building(s)/location(s) and report an inventory of all nuclear material. As of 2018, the annual inventory report must be submitted online via the NUMBAT database portal.

3.5.1 Compliance Statement

Table 4 details compliance with the reporting requirements of permit PN207 for the reporting period.

Table 4
ASNO Permit PN207 2021 – 2022 Compliance Statement

Reporting Requirements	Compliance Status
<p><i>ASO310 Inventory Listing</i></p> <p>The inventory period is to be closed on 30 June each year and this form is to be submitted to ASNO by 5 July of the same year.</p>	<p>In compliance – Annual Inventory Listing was reported via NUMBAT on the 1 July 2021 – see Appendix I.</p>
<p><i>ASO316 Description of each building</i></p> <p>This information is required to enable ASNO to meet Australia's reporting obligations under Articles 2a (iii) of the International Atomic Energy Agency's Additional Protocol (INFCIRC/540). The details provided must describe the most up to date situation - as at 31 December for the previous year - emphasising any changes that have taken place since the previous report. This information must be provided to ASNO by 15 March every year.</p>	<p>In compliance – ASO316 was submitted to ASNO on the 2 March 2022. See Appendix J for copy of email containing ASO316 as submitted to ASNO.</p>

3.6 Ministerial Statement 562

3.6.1 Compliance Statement

Table 5 provides an audit table detailing compliance status and comment for each of the conditions and proponent commitments contained within Ministerial Statement 562.

The evidence presented in Table 5 demonstrates that for the reporting period the management of the IWDF has been, with one exception, in compliance, where applicable, with the requirements of Ministerial Statement 562 (Appendix A).

The proponent was non-compliant with *Proponent Commitment 8 Community Liaison* which requires the proponent to convene a minimum of four meeting each year. For this reporting period only three meetings were held.

At the 14 October 2021 Community Liaison Committee (CLC) meeting, the CLC agreed to convene a minimum of three meetings a year instead of four.

Finance met with Environmental Protection Authority (EPA) Services to discuss the reduction of CLC meetings from a minimum of four meetings to a minimum of three meetings per year. EPA Services advised that a formal request for amendment would need to be submitted to the EPA for assessment.

Due to the significant cost associated with a formal request, Finance's senior management are currently reviewing the options.

Table 5
Statement 562 Ministerial Conditions and Proponent Commitments 2021 – 2022 Compliance

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
MINISTERIAL CONDITIONS								
MC 1.1	Implementation	Subject to these conditions and procedures, the proponent shall implement the proposals as documented in schedule 1 of this statement [Appendix A of Statement 562].	Ongoing.	EPA		Approved PCR	Satisfactory during this period	Evidence is provided in this PCR – Section 5 and Tables 6, 7 & 8. Implementation of proposal is via approval of individual disposal operations and ongoing monitoring.
MC 1.2	Implementation	Where the proponent seeks to change any aspect of the proposal as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the EPA, is substantial, the proponent shall refer the matter to the EPA.	Upon any substantial operational change.	Minister for the Environment	EPA	Proposal for change submitted to EPA	Not required at this stage	The proponent did not seek to change any aspect of the proposal as documented in schedule 1 during this reporting period.
MC 1.3	Implementation	Where the proponent seeks to change any aspect of the proposals as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the EPA, is not substantial, those changes may be effected.	Upon any operational change.	Minister for the Environment	EPA	Approved proposal	Refer MC 1.2	See above.
MC 2.1	Proponent Commitments	The proponent shall implement the environmental management commitments of 25 October 2000, as documented in schedule 2 of this statement.	Ongoing.	Minister for the Environment	EPA	Approved PCR	Progress ongoing	This PCR – Section 5 and Tables 6, 7 & 8.
MC 2.2	Proponent Commitments	The proponent shall implement subsequent environmental management commitments, which the proponent makes as part of the fulfilment of conditions and procedures in this statement.	Upon fulfilment of conditions and procedures.	Minister for the Environment	EPA	Approved PCR	Progress ongoing	See Tables 6, 7 & 8 for implementation and compliance status of environmental management commitments.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
MC 3.1	Proponent	The proponent for the time being nominated by the Minister for the Environment under section 38 (6) or (7) of the <i>Environmental Protection Act 1986</i> is responsible for the implementation of the proposals until such time as the Minister for the Environment has exercised the Minister's power under section 38(7) of the Act to revoke the nomination of that proponent and nominate another person in respect of the proposals.	Upon Ministers direction/ change of proponent.	Minister for the Environment		Approved Proponent	See MC 3.3	
MC 3.2	Proponent	Any request for the exercise of that power of the Minister referred to in conditions 3.1 shall be accompanied by a copy of this statement endorsed with an undertaking by the proposed replacement proponent to carry out the proposals in accordance with the conditions and procedures set out in the statement.	Upon Ministers direction/ change of proponent.	Minister for the Environment		Endorsed Statement	See MC 3.3	
MC 3.3	Proponent	The proponent shall notify the EPA of any change of proponent name and address.	Within 30 days of such change.	EPA		Notification	In compliance	The Minister for Environment issued a Notice of Revocation of a Proponent and Notice of Nomination as Proponent, under Section 38I of the <i>Environmental Protection Act 1986</i> , on the 21 January 2022, approving a change of proponent. The EPA was notified at this time. (Appendix F). See also Section 2.1 of this PCR for further detail.
MC 4.1	Commencement	The proponent shall provide evidence to the Minister for the Environment within 5 years of the date of this statement that the proposals have been substantially commenced.	Within 5 years of Statement (i.e., before 1 February 2006).	Minister for the Environment		Approved PCR	Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
MC 4.2	Commencement	Where the proposals have not been substantially commenced within 5 years of the date of this statement, the approvals to implement the proposals as granted in this statement shall lapse and be void. The Minister for the Environment will determine any question as to whether the proposals have been substantially commenced.	Within 5 years of Statement (i.e., before 1 February 2006).	Minister for the Environment			Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.
MC 4.3	Commencement	The proponent shall make application to the Minister for the Environment for any extension of approval for the substantial commencement of the proposals beyond five years from the date of this statement at least six months prior to the expiration of the five-year period referred to in conditions 4.1 and 4.2.	At least 6 months prior to end of 5-year period (i.e., before 1 August 2005).	Minister for the Environment		Proponent Application	Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.
MC 4.4	Commencement	Where the proponent demonstrates to the requirements of the Minister for the Environment on advice of the EPA that the environmental parameters of the proposals have not changed significantly, then the Minister may grant an extension not exceeding five years for the substantial commencement of the proposal.	Within 5 years of Statement (i.e., before 1 February 2006).	Minister for the Environment	EPA	Proponent Submission	Cleared	Cleared by EPA 23 April 2002 and 22 May 2002. Progress and Compliance Report 2001-2002.
MC 5.1	Compliance Auditing	The proponent shall submit periodic Compliance reports, in accordance with an audit program prepared in consultation between the proponent and the EPA.	Periodic.	Minister for the Environment	EPA	Submitted PCR	Not required	As a disposal operation did not occur during the reporting period submission of the 2021-2022 PCR to the EPA is not required. The 2021-2022 PCR will be submitted to the RCWA and the DWER.
MC 5.2	Compliance Auditing	Unless otherwise specified, the EPA is responsible for assessing compliance with conditions, procedures and commitments contained in this statement and for issuing formal written advice that the requirements have been met.		EPA		PCR submitted to EPA		Noted.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
MC 5.3	Compliance Auditing	Where compliance with any condition, procedure or commitment is in dispute the matter will be determined by the Minister for the Environment.		Minister for the Environment		PCR submitted to EPA		See above.
PROPONENT COMMITMENTS								
PC 1.1	Environmental Management System (EMS)	Demonstrate that there is in place an EMS that includes the following elements: (a) an environmental, health and safety policy and corporate commitment to it; (b) mechanisms and processes to ensure: <ul style="list-style-type: none"> • Planning to meet environmental, health and safety requirements; • Implementation and operation of actions to meet environmental, health and safety requirements; • Measurement and evaluation of environmental, health and safety performance; and (c) review and improvements of environmental, health and safety outcomes.	Prior to the next disposal operation.	EPA		Completed EMS	Cleared	EMS approved by the EPA 24 April 2002.
PC 1.2	Environmental Management System	Implement the EMS required by commitment 1.1.	Prior to the next disposal operation.	EPA		PCR	In compliance	See Tables 6 and 7 of this PCR for details of implementation status of EHSQMS.
PC 2.1	Environmental Management Program	Prepare an Environmental Management Program.	Prior to the next disposal operation.	EPA		Approved Environmental Management Program	Cleared	EMP was approved by the EPA 24 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 2.2	Environmental Management Program	Advertise and make the approved Environmental Management Program required by commitment 2.1 publicly available.	Prior to the next disposal operation.	EPA		PCR	Cleared	by EPA 24 April 2002.
PC 2.3	Environmental Management Program	Implement the Environmental Management Program required by commitment 2.1.	During all disposal operations.	EPA		PCR	In compliance	See Table 8 of this PCR for details of implementation status of the Environmental Management Program.
PC 3.1	Environmental Management Plans - Flora and Fauna	Prepare a Flora and Fauna Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.2	Transport Management Plan	Prepare a Transport Management Plan that describes the general principles of managing the transportation of wastes to the Intractable Waste Disposal Facility. The plan will include but not be limited to: <ul style="list-style-type: none"> • emergency preparedness; • contractor; responsibilities; • procedures; • communications; and • emergency response recovery. 	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.3	Water Management Plan	Prepare a Water Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.4	Emergency Response Management Plan	Prepare an Emergency Response Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.5	Health and Safety Management Plan	Prepare a Health and Safety Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 3.6	Air Quality Management Plan	Prepare an Air Quality Management Plan.	Prior to the next disposal operation.	EPA		Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.7	Radiation Management Plan	Prepare a Radiation Management Plan which will include but not be limited to: <ul style="list-style-type: none"> environmental radiation monitoring; periodic reporting to the EPA and RCWA procedures for compliance with the Code of Practice for the Near-surface Disposal of Radioactive Waste in Australia (1992); personnel radiation monitoring; and reporting of the monitoring results to the Community Liaison Committee. 	Prior to the next disposal operation.	EPA	RCWA	Approved Environmental Management Plan	Cleared	by EPA 24 April 2002.
PC 3.8	Decommissioning and Rehabilitation Management Plan	Prepare a Decommissioning and Rehabilitation Management Plan to include but not be limited to: <ul style="list-style-type: none"> removal or, if appropriate, retention of infrastructure; rehabilitation of all disturbed areas to a standard suitable for agreed future land use/s; and identification of disposal areas, including provision of evidence of notification to relevant statutory authorities. 	At least six months before decommissioning.	EPA	RCWA	Approved Environmental Management Plan	In progress	A preliminary Operational Decommissioning and Rehabilitation Management Plan which addresses operation specific decommissioning and rehabilitation issues was approved on 23 April 2002.
PC 3.9	Environmental Management Plans	Make the draft Environmental Management Plans required by commitment 3.1 to 3.8 available for a four-week limited stakeholder review to the: <ul style="list-style-type: none"> IWDF Community Liaison Committee; The Chamber of Minerals and Energy of Western Australia; and Chamber of Commerce and Industry of Western Australia; prior to the EPA finalising its consideration of the Plans	Prior to next disposal operation.	EPA		Approved Environmental Management Plans	Cleared	by EPA 24 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 3.10	Environmental Management Plans	Advertise and make the approved Environmental Management Plans required by commitments 3.1 to 3.8 publicly available.	Prior to next disposal operation.	EPA		PCR	Cleared	by EPA 24 April 2002.
PC 3.11	Environmental Management Plans	Implement the Environmental Management Plans required by commitments 3.1 to 3.8.	During each disposal operation.	EPA		PCR	In compliance	See Table 8 of this PCR.
PC 4.1	Operational Guidelines - Waste Acceptance	Prepare the Waste Acceptance Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.2	Environmental	Prepare the Environmental Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.3	Safety/Emergency Response	Prepare the Safety/Emergency Response Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.4	Transport	Prepare the Transport Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.5	Radiation	Prepare the Radiation Operational Guidelines.	Prior to the next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.
PC 4.6	Operational Guidelines	<p>Make the draft Operational Guidelines required by commitments 4.1 to 4.5 available for a four-week limited stakeholder review to the:</p> <ul style="list-style-type: none"> IWDF Community Liaison Committee; The Chamber of Minerals and Energy of Western Australia; and Chamber of Commerce and Industry of Western Australia; <p>prior to the EPA finalising its consideration of the Plan.</p>	Prior to next disposal operation.	EPA		Approved Operational Guidelines	Cleared	by EPA 24 April 2002.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 4.7	Operational Guidelines	Advertise and make the approved Operational Guidelines required by commitments 4.1 to 4.5 publicly available.	Prior to next disposal operation.	EPA		PCR	Cleared	by EPA 24 April 2002.
PC 4.8	Operational Guidelines	Implement the approved Operational Guidelines required by commitments 4.1 to 4.5.	During each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.
PC 5.1	Operational Procedures - Environmental, Radiation, Health & Safety	Prepare the Environmental, Radiation, Health and Safety Operational Procedures in accordance with the Operational Guidelines.	Prior to each disposal operation.	EPA		Approved Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 5.2	Transport	Prepare the Transport Operational Procedures in accordance with the Operational Guidelines to include but not limited to: <ul style="list-style-type: none"> • details of waste loading and transport activities, and emergency response training for personnel; • identification of responsibility for the various aspects of transport, loading and unloading operations; • contingency plans for dealing with fire safety, accidents, spillages, vehicle breakdowns and other incidents should they occur; and • the procedure for liaison with the local community and emergency services. 	Prior to each disposal operation.	EPA		Approved Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 5.3	Operational Procedures	Advertise and make the approved Operational Procedures required by commitments 5.1 and 5.2 publicly available.	Prior to each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 5.4	Operational Procedures	Implement the Operational Procedures required by commitments 5.1 to 5.2.	During each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.
PC 6.1	Performance and Compliance Report	Prepare the Performance and Compliance Report at the conclusion of each waste disposal operation.	Within three months following completion of each specific waste disposal operation.	EPA	RCWA in relation to radiation issues	Approved PCR	Not required during reporting period	No disposal operation occurred during reporting period.
PC 6.2	Performance and Compliance Report	Advertise and make the approved Performance and Compliance Report required by commitment 6.1 publicly available.	Within 4 weeks of obtaining approval for the PCR.	EPA		Advertisement of approved PCR	Not required during reporting period	No disposal operation occurred during reporting period.
PC 7.1	Waste	Limit disposal of waste at the Intractable Waste Disposal Facility to waste generated in Western Australia (see commitment 4.1).	Prior to each disposal operation.	EPA		Environmental, Radiation, Health and Safety Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 7.2	Waste	Ensure that approval to dispose of any specific waste is conditional on a review of currently practicably available waste treatment, disposal, or management alternatives in Australia (see commitment 4.1).	Prior to each disposal operation.	EPA		Environmental, Radiation, Health and Safety Operational Procedures	Not required during reporting period	No disposal operation occurred during reporting period.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 7.3	Waste	Prepare a waste register data base to be maintained, updated, and made publicly available at the office of the proponent or on the World Wide Web.	Prepare the waste register data base within six months of the issuing of the Minister's Statement that the proposal may be implemented and update the register within three months of completion of each disposal operation.	EPA		PCR/Waste Register Database	In compliance	The waste register / database was updated to include the waste disposed within three months of completion of Disposal Operation 2020NRT01. No disposal operation occurred during reporting period.
PC 8	Community Liaison	Convening a minimum of four meetings a year of the Community Liaison Committee.	Following the Minister's Statement that the proposal may be implemented.	EPA		PCR	Non-compliance	CLC meetings were held on 14 October 2021, 10 February, and 30 June 2022. See Appendix K for minutes of CLC meetings.
PC 9	Fencing and Signposting	Fence and signpost each discrete disposal cell.	Prior to demobilisation of each waste disposal operation following the Minister's Statement that the proposal may be implemented.	EPA		PCR	In compliance	Each disposal cell at the IWDF has been fenced and continues to be fenced. Fencing can be seen in Appendix L October 2021 Rehabilitation Monitoring report and Appendix M October 2021 Capping Monitoring Report.
PC 10	Water	Demonstrate that there are at least 5 metres of clay between the base of any disposal cell and bedrock.	Prior to each disposal operation.	EPA		PCR	Not required during reporting period	No disposal operation occurred during reporting period.

NO	TOPIC	ACTION	TIMING / PHASE	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA	STATUS	REFERENCE / COMMENT / EVIDENCE
PC 11	Transport and Packaging	Where transport and packaging is to be undertaken by a party other than the proponent, the proponent will ensure that the packaging and transport requirements specified in the Operational Transport Guidelines and Waste Acceptance Guidelines are adhered to through the use of contracts and other controls as necessary (see commitments 4.1 and 4.4).	Prior to the commencement of transportation activities during each disposal operation.	EPA		Approved Operational Transport Procedures	Not required during reporting period	No disposal operation occurred during reporting period.
PC 12	Decommissioning and Rehabilitation	Implement the requirements of the Decommissioning and Rehabilitation Management Plan until the Minister for the Environment determines that decommissioning and/or rehabilitation is/are complete.	During decommissioning and/or rehabilitation.	Minister for the Environment		Determination by the Minister for the Environment that decommissioning and/or rehabilitation is/are complete.	Not required at this stage	The IWDF is operational.

4. ENVIRONMENTAL, HEALTH AND SAFETY AND QUALITY MANAGEMENT SYSTEMS

4.1 Overview

The IWDF Environmental, Health and Safety and Quality Management System (EHSQMS), as required by Ministerial Statement 562 Proponent Commitment No. 1, is designed to identify areas of actual or potential environmental risk resulting from activities at the IWDF, and to formulate procedures and objectives which minimise or eliminate these risks.

The IWDF EHSQMS consists of two separate but integrated management systems. The Finance management system details the high-level management requirements for the IWDF, and the FMC management system details the management requirements for the IWDF site. Both systems consist of management manuals, procedures, work instructions and associated forms which provide guidance for all activities related to the management and the ongoing operational activities of the IWDF.

4.2 Management Manuals and Procedures

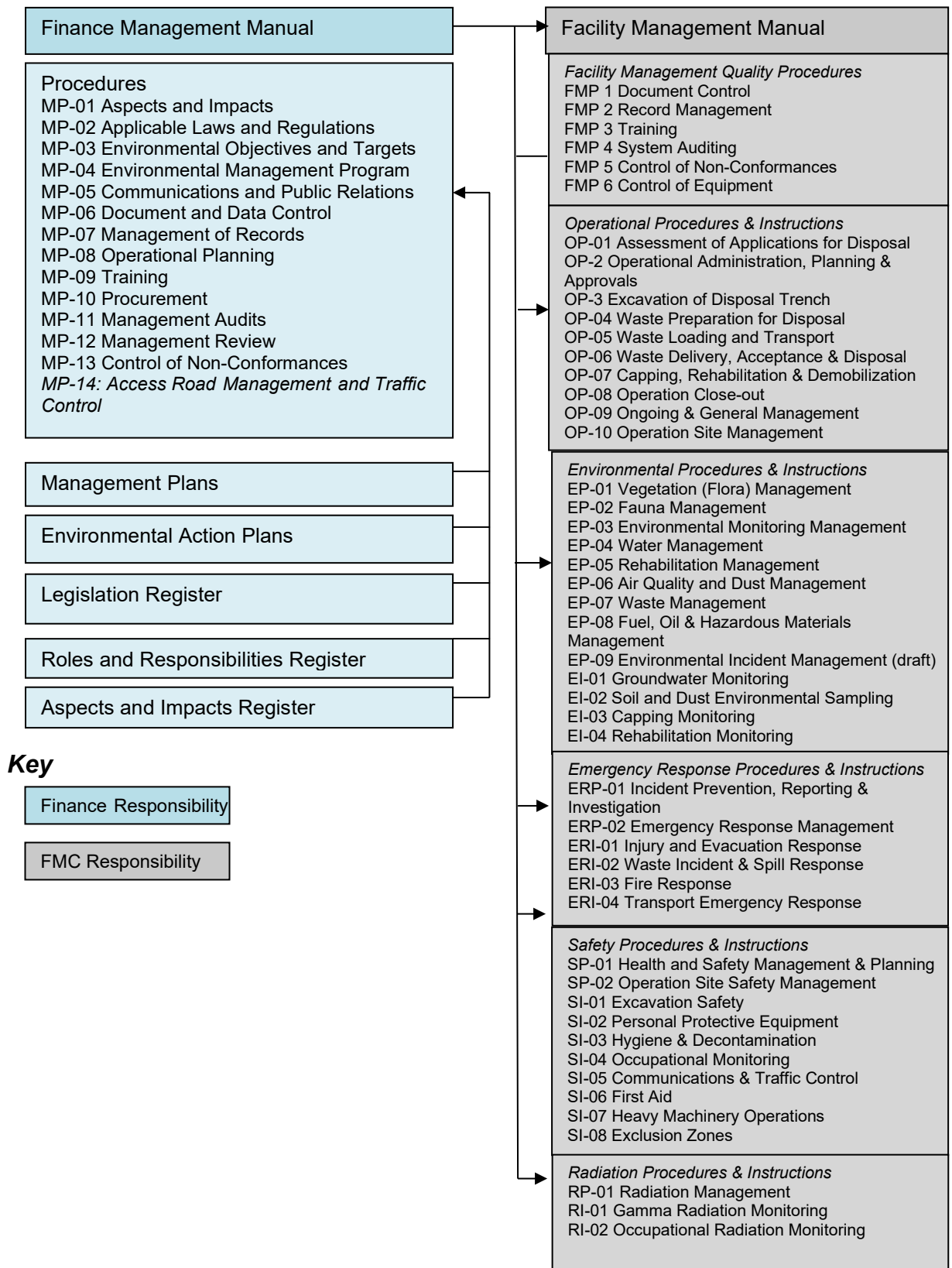
There are two management manuals which contain essential information about the management of the IWDF and provide an overview of the systems; these two manuals are provided as Appendix N and are described below.

Finance's management and policy manual provides details on the IWDF site and an overview of the components of the management system and how they are integrated.

The FMC management manual highlights the FMC's status and details the structure of the FMC procedures and their interaction with Finance's system.

Figure 3 provides a diagrammatic explanation to the inter-relationship between the Finance management system and the FMC IWDF management system.

**Figure 3
IWDF EHSQMS Manuals, Procedures Structure and Relationship**



4.2.1 Finance Management System Compliance Audit

Table 6 documents the results of an internal compliance audit of Finance's EHSQMS Procedures for the reporting period.

MP-14 Access Road Management and Traffic Control has not been audited as it primarily deals with the Access Road which is now outside the scope of the IWDF.

One non-compliance was recorded for the reporting period.

MP-08 requires the proponent to hold CLC meetings at least four times per year. For the reporting period CLC meetings were held 14 October 2021, 10 February 2022, and 30 June 2022.

It should be noted that at the 14 October 2021 CLC meeting the CLC agreed to hold meetings three times a year unless activities at the IWDF, such as a disposal operation, require an increase in meeting frequency.

Finance has met with the EPA Services Unit to discuss options for modifying Ministerial Statement 562 to reflect this agreement. Until Ministerial Statement 562 is modified the requirement of at least four meetings per year will remain in MP-08.

Table 6
Finance Environmental, Health and Safety and Quality Management System 2021 - 2022 Internal Compliance Audit of Procedures

Section	Requirement	Status	Evidence / Comment
Procedure: MP-01 Aspects and Impacts			
4.2	Environmental, health and safety, socio-political and legal aspects from normal, abnormal, and emergency situations have been considered when identifying aspects and impacts.	In compliance	Aspects and Impacts Register addresses environmental, health and safety, socio-political and legal aspects. See Appendix O for 2021 - 2022 register.
4.2	The aspects and impacts register has considered aspects from excavation, operational planning, transport, waste inspection and acceptance, monitoring, surface and groundwater management and emergency response activities.	In compliance	Aspects and Impacts Register addresses all required aspects. See Appendix O.
4.3	Each aspect / impact has been assigned a likelihood and consequence value.	In compliance	Review of the Aspects and Impacts Register demonstrated that each aspect and impact has been assigned a likelihood and consequence value. See Appendix O.
4.3	A risk value has been established for each aspect and impact.	In compliance	Review of the Aspects and Impacts Register confirmed that a risk value has been established for each aspect and impact. See Appendix O.
4.3	The level of risk for each aspect and impact has been derived from the product of likelihood and consequence.	In compliance	Review of the Aspects and Impacts Register demonstrated that the level of risk for each aspect and impact has been derived from the product of likelihood and consequence. See Appendix O.
4.3	Significant aspects have been identified.	In compliance	The register was reviewed in Dec 2021 and May 2022 by FMC Project team. It was verified that all significant

Section	Requirement	Status	Evidence / Comment
			aspects of the operation of the IWDF had been identified. See Appendix O.
4.4	The Aspects and Impacts Register has been reviewed annually and prior to an operation or following significant impact or change.	In compliance	Aspects and Impacts Register was reviewed Dec 2021 and May 2022. See Appendix O.
Procedure: MP-02 Applicable Laws, Regulations, and other Requirements			
4.1	In the identification of legislation, the relevant regulatory authorities, legal experts and site conditions and commitments have been consulted.	Partial compliance	The register was compiled in 2000. There is evidence that the relevant regulatory authorities, site conditions and commitments have been consulted but there is no evidence that legal experts were consulted.
4.2	Principal legislation has been divided into State and Commonwealth and other requirements such as relevant guidelines and codes of practice.	In compliance	Review of legislation register confirmed that principal legislation has been divided into State and Commonwealth. See Appendix P.
4.3	Legal registers have been reviewed annually and prior to each disposal operation and have considered new and amended legislation and changes to the IWDF's activities.	In compliance	The registers were reviewed in Dec 2021. See Appendix P.
4.3	The FMC Project Manager shall consult the following sources during this review: <ul style="list-style-type: none"> • Government Gazette • Australasian Legal Information Institute (Austlii) for Cwth legislation • Western Australian Legislation. 	In compliance	Review of IWDF document library demonstrated that legislation updates were retrieved from all available sources.
4.3	A copy of relevant new or amended legislation has been downloaded and placed in the Legislation folder of the document library.	In compliance	A review of the folder demonstrated that new versions, where applicable, of legislation are downloaded to the document library legislation folder.

Section	Requirement	Status	Evidence / Comment
4.3	Obsolete copies of legislation are removed from the document library.	In compliance	A review of the legislation folder of the document library demonstrated the superseded version of legislation is deleted.
4.3	The implications of new or amended legislation have been determined and presented at a Management Review Meeting.	In compliance	The inclusion of the new <i>Work Health and Safety Act 2020</i> was reported at the Dec 2021 Management Review Meeting. See Appendix Q for Minutes of MRM.
4.4	Proposed changes to applicable requirements or the establishment of new legislation applicable to the management of the IWDF shall be tracked to ensure Finance: <ul style="list-style-type: none"> • has an opportunity to provide input into proposed changes which may affect its operations; and • can plan and implement any changes in a timely and cost-effective manner. 	In compliance	Proposed changes to applicable requirements or the establishment of new legislation were tracked by the FMC Project Manager who kept Finance updated at monthly management meetings and management review meetings. See Appendix Q for minutes of Management Review Meetings.
Procedure: MP-03 Objectives and Targets			
4.2.1	The environmental and health and safety policy and significant aspects and impacts have been considered in the development of management objectives.	In compliance	Review of the management objectives as documented in the management plans confirmed that the environmental and health and safety policy and significant aspects and impacts have been considered in the development of management objectives. See Appendix E.
4.2.1	Management objectives have been placed in the relevant management plan.	In compliance	Review of the management plans (Appendix E) verified that where applicable, management objectives have been placed in the relevant management plan.

Section	Requirement	Status	Evidence / Comment
4.2.2	Targets are specific, realistic, achievable, practical and quantifiable.	In compliance	Review of the management plans confirmed that targets were specific, realistic, achievable, practical, and quantifiable. See Appendix E.
4.3.1	Improvement objectives have been based on deficiencies in management controls, new technologies and practices and changes to the IWDF’s activities.	In compliance	Review confirmed that where appropriate, improvement objectives were based on outcomes of the internal audits, best practice technologies and any changes to IWDF activities.
4.3.2	Improvement targets are based on improvement objectives.	In compliance	Review of the management plans confirmed that where applicable, targets were based on improvement objectives. See Appendix E for Management Plans.
4.3.2	Improvement targets are specific, quantifiable, and achievable and have a start and completion date, personnel allocations and detail the required actions.	In compliance	See Appendix E for Management Plans.
4.3.2	Improvement targets are detailed in the action plans.	In compliance	See Appendix R for Action Plans.
Procedure: MP-04 Environmental, Health and Safety Management Program			
4.3	Each management plan details the relevant policy, management goal, management target, management program, improvement program, relevant documents and procedures, forms, performance monitoring, reporting and key responsibilities.	In compliance	Review of management plans confirmed that each management plan details the required elements. See Appendix E.
4.4	Action plans contain a policy aim, improvement target, improvement objective, action requirements, responsible personnel, completion date and records of achievement.	In compliance	Review of action plans confirmed that each plan details the required elements. See Appendix R for Action Plans.

Section	Requirement	Status	Evidence / Comment
4.5.1	Management plans have been reviewed every 6 months and / or following significant changes to activities at the IWDF or the identification of new significant aspects.	In compliance	Management Plans were reviewed and updated Nov 2021, Feb 2022, and May 2022. See Appendix E.
4.5.1	Changes to management plans have been reported at the Management Review Meetings (MRM).	In compliance	Changes to Management Plans were reported at the MRMs, held 16 Dec 2021 and 02 Jun 2022. See Appendix Q for minutes.
4.5.2	Action plans have been reviewed monthly and progress towards achievement reported at a Management Review Meeting.	In compliance	Action Plans were reviewed monthly at the monthly ongoing management meetings. Progress towards achievement was reported at Management Review Meetings. See Appendix Q.
Procedure: MP-05 Communications and Public Relations			
5.3	All quality critical communications are legible, verifiable, and correctly formatted.	In compliance	Review of critical communication confirmed that all quality critical communications meet Finance quality requirements and are approved or signed by the appropriate delegated signatory.
5.3.1	All written communications are recorded in a manner consistent with MP-06	In compliance	Review of critical communication confirmed that all written communications were recorded in a manner consistent with MP-06.
5.3.2	All verbal communication, whether in the form of meetings or telephone conversations, if deemed to be quality critical, shall be recorded in the minutes of the meeting or meeting notes or recorded on file note. These records shall then be filed, and appropriate action undertaken.	In compliance	Review confirmed that verbal communication, where quality critical, is recorded.

Section	Requirement	Status	Evidence / Comment
5.4	Complaints have been investigated, non-conformance recorded, and the complaint entered onto the complaints register.	N/A	No complaints were received during reporting period.
5.5	Large-scale external communications have been referred to the IWDF Project Director.	In compliance	Large-scale external communications such as the DWER licence renewal submission was reviewed by the Project Director prior to submission.
5.5	Media releases have been developed in consultation with public affairs.	In compliance	No significant media releases were developed during reporting period, all advertisements during the reporting period were reviewed by Finance's Communication Unit.
Procedure: MP- 06 Document and Data Control			
4.2	Documents have been managed as specified in the document control matrix.	In compliance	Review confirmed that all Finance documents have been managed as specified in the document control matrix.
4.3	Controlled documents have been registered on the Finance Records Management System.	In compliance	All controlled documents are registered on the Finance Records Management System. See Appendix Q MRM minutes, Section 3.4 of Dec 2021 minutes.
4.4	Controlled documents have been distributed according to the Document Control Matrix.	In compliance	Review confirmed that controlled documents created during the reporting period have been added to the Document Control Matrix. See Appendix S for Finance Document Controlled Matrix.
4.4	If a document is distributed by email an e-copy of the email should be saved into the relevant folder as evidence of distribution.	In compliance	Review demonstrated that controlled documents were distributed via email and the emails are saved in an email correspondence folder, for example, the waste enquiry folder.

Section	Requirement	Status	Evidence / Comment
4.5	Revisions of documents have been distributed according to the Document Control Matrix.	In compliance	Revisions of controlled documents have been circulated by email and are saved in the appropriate folder on the FMC server.
4.5	As hardcopy is no longer used document approval shall be indicated by making the electronic version 'final' and password protecting the document. The Document Control Matrix (Finance-MF-06-2) indicates at which location the final version of a document is retained.	Partial compliance	Inspection confirmed that all controlled documents are held at the location specified in the Document Control Matrix. Password protection of final versions of documents is not implemented given the current version control systems in place, it is recommended that the password protection requirement is removed. See Appendix S for Finance Document Control Matrix.
4.5	The Document Control Matrix details the document preparer, reviewer, approver, controller, and location for each document.	In compliance	All required aspects are detailed. See Appendix S for Finance Document Control Matrix.
4.5	All documents have a revision number on cover page and in the header or footer	In compliance	Review confirmed that all documents, except a few unused forms, include a revision number in the footer – there are too many documents to be included as evidence.
4.5	External documents have been reviewed during planning for each disposal operation to ensure they are up to date.	N/A	No disposal operation occurred during the reporting period, however all external documents such as legislation, standards and codes of practice were reviewed as part of the of the Legal and Other Requirements Register review. See Appendix P.
4.8	Master copies of documents have been stored in the correct location, as outlined in Document Control Matrix	In compliance	Review confirmed all master copies are stored in electronic format in the appropriate folder on the FMC or Finance server and are saved to Finance's records management system.

Section	Requirement	Status	Evidence / Comment
Procedure: MP-07 Management of Records			
4.2.1	<p><i>Incoming Correspondence</i> All incoming correspondence (including critical emails, letters, and other documents), shall be entered into the Finance corporate recordkeeping system. The following information shall be noted on the correspondence and entered on the database:</p> <ul style="list-style-type: none"> • date; • received by; • initial distribution (for action); and • file number. 	In compliance	The Finance IWDF Project Director confirmed that critical correspondence is included in the Finance Records Management System. See Appendix Q Section 3.4 of Dec 2021 MRM minutes.
4.2.2	<p>All critical, outgoing correspondence (including letters, critical emails, faxes, and documents) shall be entered onto the Finance corporate recordkeeping system database.</p> <p>At a minimum the following information shall be recorded in the Finance corporate recordkeeping system:</p> <ul style="list-style-type: none"> • recipient details; • file number; • author; • subject; • date sent; and • correspondence type. <p>A unique Finance corporate recordkeeping system number will be allocated, and this number shall be referenced on the correspondence. A copy of all outgoing correspondence shall be placed on the appropriate file.</p>	In compliance	See comment above

Section	Requirement	Status	Evidence / Comment
4.3	<p>All incoming and a copy of all outgoing communication, including letters, critical emails, faxes, reports, and where required, records of telephone conversations, will be filed on the appropriate Finance Records Management System IWDF file.</p> <p>All IWDF files will then be stored in accordance with Department of Finance Record Keeping Policy.</p>	In compliance	The Finance Project Director confirmed communications are appropriately stored. See Appendix Q Section 3.4 of Dec 2021 MRM minutes.
4.3.1	Electronic files are routinely backed up as part of the government department backup procedures	In compliance	Interview confirmed that all critical documents are backed up daily as part of the Finance backup routine.
4.4	Archiving & Storage of Records		
4.4.1	<p>Identifying Documents for Archiving</p> <p>All records will be assessed for their importance in the following areas prior to being filed:</p> <ul style="list-style-type: none"> • Legislative and regulatory requirements; • Compliance assessments; • Identification and management of environmental aspects and their associated impacts; • Training; • Audit and review records; • Monitoring data; • Details of non-conformances; and • Public information/record. <p>The Finance IWDF Project Manager, in consultation with the Senior Records Officer will determine if the document should be retained and the retention period, in accordance with 4.4.3.</p>	In compliance	Auditor reviewed the Department of Finance Retention and Disposal Schedule (approved by State Records Commission March 2014) which includes all appropriate IWDF documents. See Appendix H for extract of IWDF records from R&D Schedule.

Section	Requirement	Status	Evidence / Comment
4.4.2	<p>Archiving Schedule The Department of Finance Retention and Disposal Schedule has been developed based on 4.4.1 and details the types of documents which must be retained.</p> <p>This R&D schedule will be reviewed annually, and any new document types added. Any changes to the archiving schedule will be detailed at the Management Review Meeting and a copy of the new schedule sent to the Facility Management Contractor.</p> <p>All records on the archiving schedule will be managed as specified in the schedule.</p>	In compliance	The Department of Finance Retention and Disposal Schedule (approved by State Records Commission March 2014) includes all appropriate IWDF documents. The Finance IWDF Project Director confirmed that the relevant IWDF content in the R&D schedule is reviewed annually. See Appendix H for extract detailing IWDF records from R&D Schedule. See Appendix Q MRM Minutes Dec 2021 Section 4.8 for evidence of annual R&D Schedule review.
4.4.3	<p>Establishing Retention Periods The retention period of specific records is dependent upon:</p> <ul style="list-style-type: none"> • regulatory requirements; • nature of the records; • potential liability and insurance purposes; and • physical nature of the record. <p>The retention period of management records will be determined by the Finance IWDF Project Manager and shall be in accordance with Finance procedures and documented in the State Records Commission approved Retention and Disposal Schedule.</p>	In compliance	The Department of Finance Retention and Disposal Schedule (approved by State Records March 2014) contains appropriate retention periods. See Appendix H for extract detailing IWDF records from R&D Schedule.
4.4.4	<p>Storage of Records Archived records shall be retained in a secure and easily accessible location, which prevents deterioration and damage, for a predetermined retention period.</p>	N/A	No documents have been archived by Finance to the State Records Office, as required by the Finance R&D Schedule, due to storage restrictions at the State Records Office.

Section	Requirement	Status	Evidence / Comment
	<p>Details of all archived records and their storage shall be detailed in the Department of Finance Retention and Disposal Schedule which is kept on the relevant IWDF file and a copy retained in the IWDF Electronic Document Library.</p> <p>For each record the following information shall be recorded:</p> <ul style="list-style-type: none"> • description or title; • master record location (including file number if applicable); • officer responsible for retention of that record; and • retention period. <p>All records shall be assessed by the responsible person for clarity and completeness prior to storage. If records are found to be inadequate, they shall be updated prior to storage.</p>		<p>The state archives (WA State Records Office) with the responsibility for providing record keeping services to the WA government have been closed for submissions for many years and although some increased capacity has been communicated, only limited submissions for records over 25 years old, where the responsible party can no longer preserve them, are being accepted. The IWDF site records are kept at RCWA and the Department of Finance.</p> <p>Both the RCWA and Finance have legislated government archiving requirements under the <i>State Records Act 2000</i> which outlines the requirements of government for the keeping of State records by government. Under the current Act, electronic records designated as State archives are to remain in the custody of the agency that created or managed them. As almost all the IWDF records are now in electronic format they continue to be held by the RCWA and Finance.</p>
4.4.5	<p>Legal Deposit</p> <p>Finance is required to comply with the <i>Legal Deposit Act 2012</i> and deposit the following documents within the State Library of Western Australia:</p> <ul style="list-style-type: none"> • Annual PCR • IWDF Handbook (as updated) • IWDF 2-page brochure (as updated). 	N/A	<p>On agreement with the State Library the required deposit of documents under will occur when the 2020 – 2021 PCR is finalised. The 2020-2021 PCR was not finalised during the audit period. See Appendix Q Section 3.6 June 2022 MRM Minutes.</p>

Section	Requirement	Status	Evidence / Comment
	<p>All relevant documents shall be assessed by the responsible person for clarity and completeness prior to submission to the State Library of Western Australia.</p> <p>Relevant documents should be provided to the State Library of Western Australia annually.</p>		
4.5	The waste volume, type, owner, packaging, trench design and reports for each disposal operation have been entered into the IWDF's public access database.	In compliance	All required information is available in the IWDF Waste Inventory Database.
Procedure: MP-08 Operational Planning			
5.1	An information package containing waste acceptance guidelines, Waste Proforma and background information has been sent to all potential waste disposers.	In compliance	Review of waste enquiry folder managed by the FMC confirmed that all potential waste disposers have been provided, via email, an information package containing waste acceptance guidelines, waste proforma and background information.
5.1	A completed Waste Proforma has been provided by all waste disposers and forwarded to FMC and RSO.	In compliance	Review of waste enquiry folder managed by the FMC confirmed all completed Waste Acceptance Proformas submitted during reporting period have been forwarded to the FMC and RSO for assessment.
5.1	A non-refundable deposit and signed waste disposal agreement has been received from all waste disposers.	N/A	No disposal operation occurred during the reporting period.
5.2	Weekly project planning meetings have been held during disposal operations.	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
5.2	Operational procedures and other documentation have been prepared by the FMC and forwarded to the EPA and Radiological Council for approval.	N/A	No disposal operation occurred during the reporting period.
5.3	The condition of the access road has been determined and maintenance organised.	In compliance	See Appendix T for Oct 2021 and Apr 2022 Access Road condition reports.
5.3	Inspections of waste packaging have been undertaken.	N/A	No disposal operation occurred during reporting period.
5.3	Surrounding community and emergency services have been informed of the planned operation including transport routes, dates, and waste consignments.	N/A	No disposal operation occurred during reporting period.
5.4	An inspection of the waste loading process has been completed.	N/A	No disposal operation occurred during reporting period.
5.5	An audit of the operation's compliance with environmental, health and safety and emergency response operational procedures has been undertaken.	N/A	No disposal operation occurred during reporting period.
5.5	Certificates of acceptance have been sent to waste disposers.	N/A	No disposal operation occurred during reporting period.
5.7	A performance and compliance report has been submitted to the EPA.	N/A	No disposal operation occurred during reporting period.
5.7	A copy of the approved Performance and Compliance report has been forwarded to the CLC and waste disposers.	N/A	No disposal operation occurred during reporting period.
5.7	Certificates of disposal have been sent to each waste owner.	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.7	A copy of the Performance and Compliance report has been retained for archiving.	In compliance	As required by the Department of Finance Retention & Disposal Schedule (approved March 2014) a copy of the 2020 – 2021 PCR has been retained for archiving.
5.8.1	The IWDF access road has been inspected every six months.	In compliance	Access road inspection occurred Oct 2021, and Apr 2022. See Appendix T for road inspection records.
5.8.2	Reports on the condition of the access road have been completed and forwarded to Finance.	In compliance	Access road inspection occurred Oct 2021, and Apr 2022 and were forwarded to Finance with the next monthly reporting. See Appendix T.
5.8.3	Ongoing groundwater and radiation monitoring have been undertaken.	In compliance	Groundwater monitoring was completed in Oct 2021, and Apr 2022. See Appendix U for monitoring records. Radiation monitoring was not required during the reporting period.
5.8.4	Community Liaison Committee meetings have been held at least four times per year.	Non-compliance	CLC Meetings were held 14 Oct 2021, 10 Feb 2022, and 30 Jun 2022. See Appendix K for CLC meeting minutes.
5.8.5	A representative of Finance has attended all CLC meetings and acted as chairperson	In compliance	A Finance representative attended all CLC meetings and acted as chairperson. See Appendix K for CLC meeting minutes.
Procedure: MP-09 Training			
4.2	All new personnel have attended induction training	N/A	Eleanor Hopkins (Finance IWDF Project Director) and Sze-Wan Ng (Finance IWDF Contract Manager) received IWDF background and system training on the 26 July 2021.

Section	Requirement	Status	Evidence / Comment
4.3	A competency plan has been developed for each position	In compliance	Finance undertakes Professional Development Plan assessments with staff, three times every twelve months, that reviews competency against the requirements and deliverables of the role. The IWDF Project Manager role also has a distinct Job Description Form (JDF) that applicants are assessed against before being deemed suitable to undertake the role.
4.3	A training schedule has been developed based on the competency plans.	N/A	See above.
4.4	Annual training reviews have been completed for each staff member.	In compliance	Finance undertakes Professional Development Plan assessments with staff, three times every twelve months, that reviews competency against the requirements and deliverables of the role.
4.4	Where a job scope has been significantly altered, the employee has failed to meet requirements, a major accident has occurred or substantial changes to the management system have been undertaken, training needs have been re-evaluated.	N/A	Not required as no relevant events occurred during the reporting period.
4.5	The qualifications of the contractors have been confirmed as part of the tender process.	N/A	No open tender process occurred during reporting period.
4.5	The FMC has been provided with management system training as part of the implementation of the management system and following major changes or revisions.	N/A	Not required as there have been no FMC personnel changes during reporting period.
4.6	All training has been recorded on a Training Record sheet and kept on file.	In compliance	Review of Training Record confirmed that all training has been recorded.

Section	Requirement	Status	Evidence / Comment										
Procedure: MP-10 Procurement													
7.2	<p>Minimum Competitive Requirements</p> <p>The following table sets out the minimum competitive requirements that must be adhered to at different monetary values.</p> <table border="1" data-bbox="331 507 1176 778"> <thead> <tr> <th data-bbox="331 507 638 560">Monetary Threshold</th> <th data-bbox="638 507 1176 560">Minimum Requirements</th> </tr> </thead> <tbody> <tr> <td data-bbox="331 560 638 612">Up to \$5,000</td> <td data-bbox="638 560 1176 612">Direct purchase or “do and charge”</td> </tr> <tr> <td data-bbox="331 612 638 665">\$5,001 – \$20,000*</td> <td data-bbox="638 612 1176 665">Request sufficient verbal quotations</td> </tr> <tr> <td data-bbox="331 665 638 718">\$20,001 – \$250,000*</td> <td data-bbox="638 665 1176 718">Request sufficient written quotations</td> </tr> <tr> <td data-bbox="331 718 638 770">Above \$250,000</td> <td data-bbox="638 718 1176 770">Open tender through a public advertisement</td> </tr> </tbody> </table> <p>The monetary value is based on Total Estimated Value of the procurement, which includes any extension options and GST.</p> <p>When seeking written quotes, enough suppliers should be asked to provide a quote. Generally, three to five suppliers should be asked to quote, however this number may be higher in markets with more competition.</p> <p>The minimum competitive requirements do not apply when purchasing from a:</p> <ul style="list-style-type: none"> • Common Use Arrangement or State agency led Standing Offer, in accordance with the Buying Rules; or • Registered Aboriginal Business or Australian Disability Enterprise. 	Monetary Threshold	Minimum Requirements	Up to \$5,000	Direct purchase or “do and charge”	\$5,001 – \$20,000*	Request sufficient verbal quotations	\$20,001 – \$250,000*	Request sufficient written quotations	Above \$250,000	Open tender through a public advertisement	In compliance	Procurement related to the IWDF by the FMC occurred during the reporting period. A review of the purchasing process undertaken for the replacement generator and fuel tank project, completed August 2021 confirmed that the cost was less than \$50,000 therefore direct purchasing by Finance staff in accordance with the WA Procurement Rules was applied. Several quotes were requested and justification for the successful supplier was provided to Finance by the FMC using the Verbal Quotation Form. The purchase was approved by the IWDF contract Manager 13 August 2021 (Trim Folder: 2013/12374).
Monetary Threshold	Minimum Requirements												
Up to \$5,000	Direct purchase or “do and charge”												
\$5,001 – \$20,000*	Request sufficient verbal quotations												
\$20,001 – \$250,000*	Request sufficient written quotations												
Above \$250,000	Open tender through a public advertisement												
7.3	Approval	In compliance	Review of the FMC procurement folder demonstrated that the quotations were received, assessed and a recommendation was made, via the Verbal Quotation										

Section	Requirement	Status	Evidence / Comment
	<p>Purchases are to be approved by an Authorised Officer from Finance in accordance with its Delegation and Authorisation Register. The request for approval must include the following information at a minimum:</p> <ul style="list-style-type: none"> • Description of the purchase/specification; • Name of suppliers and their quoted prices; • Any relevant information including warranty details, service and support etc.; and • Recommendation and value for money justification. 		Form, to the Finance IWDF Contract Manager with a request for approval. Approval was received from Finance IWDF Contract Manager on the 13 Aug 2021.
7.4	<p>Request Documentation</p> <p>Purchases valued at \$50,000 or greater will require documentation to clearly detail the items below. The format in the Request for Quote or Request for Tender templates should be followed.</p> <ul style="list-style-type: none"> • Request specification; • Evaluation criteria; • Closing date and time; • Contract term; and • Contract terms and conditions. 	N/A	No purchases at or above \$50,000.00 occurred during reporting period.
7.5	<p>Evaluation of Responses</p> <p>For purchases above \$50,000, an evaluation panel, consisting of two or more members including the IWDF Project Manager, shall be formed. A procurement process facilitator will be nominated from the panel members to lead the evaluation process.</p> <p>Each member of the panel will be required to independently review the responses and score against the specified evaluation criteria. The panel shall then convene and make a joint decision regarding the preferred respondent based on these scores.</p>	N/A	No purchases above \$50,000.00 occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>An evaluation report is to be prepared, outlining the findings and recommendation of the evaluation panel. The report is to be submitted to the Authorised Officer who will provide their approval. A copy of the evaluation report shall be retained as a record.</p> <p>Non-conforming responses, including those received after the closing time, or those which do not meet the specified mandatory prequalification requirements will be excluded from consideration.</p>		
7.6	<p>Contract Award Following approval of the recommendation in the evaluation report by the Finance Authorised Officer in accordance with the Delegation and Authorisation Schedule, a letter of award will be sent to the successful respondent.</p>	N/A	No purchases above \$50,000.00 occurred during reporting period.
7.7	<p>Managing Contracts Once a contract is in place, various measures shall be implemented to ensure that the contracted goods or services are being provided in accordance with the conditions of the contract. This will include:</p> <ul style="list-style-type: none"> • managing supplier relationships and resolving or escalating disputes as appropriate; • monitoring and managing the budget and timeframes; • confirming the quality and receipt of goods or services; • validating and processing supplier invoices; • reviewing variations for value for money; and • keeping records of key documentation and correspondence. <p>Approvals will be sought from the Authorised Officer from Finance as required by the Delegation and Authorisation Register.</p>	In compliance	<p>The Finance Project Director confirmed that:</p> <ol style="list-style-type: none"> 1. Expenditure for the genset and fuel tank was captured in the IWDF Financial reports, 2. The invoice for the genset and fuel tank was provided to Finance with the monthly FMC costs and confirmed against the initial quote. 3. The FMC confirmed receipt and quality of the goods – See Appendix Q MRM Minutes, 16 Dec 2021 Section 11.3.

Section	Requirement	Status	Evidence / Comment
	Where a procurement has a Total Estimated Value of \$5 million and above, a Contract Management Plan must be developed, unless otherwise exempted through the relevant process.		
Procedure: MP-11 Management Audits			
4.1	Annual audits have been undertaken.	In compliance	This audit table is evidence of internal audit for the reporting period.
4.1	An Internal Management Audit Schedule has been prepared in June of each year.	In compliance	Audit schedule was prepared by FMC System Manager in Jun 2021. See Appendix V.
4.2	Audits have been conducted by an audit team which contains a qualified auditor.	In compliance	Audit team included a qualified auditor.
4.3.3	An audit protocol has been prepared prior to the audit.	In compliance	Audit protocol was prepared.
4.3.3	Staff have been notified at least 2 weeks prior to the audit.	In compliance	Relevant staff were notified up to one month prior to audits taking place. Notification occurred at the monthly management meetings.
4.3.3	An audit report register has been completed.	In compliance	A completed Audit Register was sighted by the auditor.
4.3.3	Any non-conformances determined have been recorded in a Corrective Action Request (CAR).	In compliance	One non-compliance was recorded, and CAR 007 was raised.
4.4	Audit findings have been documented in an audit report and logged on the audit report register.	In compliance	Audit findings have been documented in an audit report (this report) and logged in the audit register.

Section	Requirement	Status	Evidence / Comment
4.4	The audit report has been forwarded to the Finance Project Manager and distributed to personnel.	In compliance	Audit reports included in the draft PCR were provided to Finance IWDF Project Director for review.
4.5	A Performance and Compliance report was prepared and forwarded to the EPA within three months of the conclusion of a disposal operation.	N/A	No disposal operation occurred during the reporting period. This PCR will be forwarded to RCWA to fulfil Registration compliance reporting.
4.5	Internal performance and compliance audits were undertaken in accordance with the audit schedule each year.	In compliance	Tables 6, 7 and 8 of this PCR detail the results of the internal performance and compliance audits for the reporting period.
Procedure: MP-12 Management Review			
4.1	Management Review Meetings (MRM) have been held twice yearly.	In compliance	MRMs were held 16 Dec 2021 and 02 Jun 2022. See Appendix Q for MRM meeting minutes.
4.1	The required personnel, as specified in 4.1, have attended the meetings.	In compliance	The MRM meeting was attended by the Finance Project Director, Finance Contract Manager (Project Manager), FMC Project Director, FMC Project Manager and the RSO. See Appendix Q for MRM minutes detailing attendance.
4.2	The agenda and relevant background information has been provided to all personnel prior to the Management Review Meeting.	In compliance	Agendas were provided, via email, to the management team via email on 2 Dec 2021 (draft), 14 Dec 2021 (final) and 26 May 2022 (draft). See Appendix W for meeting agendas.
4.3	Management review meetings have addressed the suitability of Finances policies, achievement of objectives and targets, EHSM program and corrective and preventative actions.	In compliance	Management review meetings addressed the required elements. See Appendix Q.

Section	Requirement	Status	Evidence / Comment
4.3	<p>Management Review Meeting agendas address the topics:</p> <ul style="list-style-type: none"> • suitability of the Policy; • achievement of Objectives and Targets; • compliance with the Environmental Management Program; • effectiveness of the EMS in terms of: <ul style="list-style-type: none"> ▪ environmental performance; ▪ implementation and suitability; ▪ adequacy; ▪ continual improvement. • corrective and preventative actions. <p>The review shall include, but not be limited to the following agenda items:</p> <ul style="list-style-type: none"> • policies, objectives, targets, and management plans; • changes in external drivers and situations; • management manual updates, including polices, objectives and targets; • audit results; • management procedures updates/improvements; • internal and external management audits results; • non-conformance and Corrective and Preventive Actions; • future goals and improvements to the management system; • changes to aspects and impacts; • performance against management plans; and • staff training needs and training effectiveness. 	In compliance	See Appendix W for MRM meeting agendas.
4.3	The responsibility for the implementation of changes or actions has been assigned during Management Review Meetings and is recorded in the minutes.	In compliance	See Appendix Q.

Section	Requirement	Status	Evidence / Comment
4.3	Follow up on the achievement of these improvements and actions has been completed.	In compliance	Actions from the previous MRM meeting are addressed in Section 3 of the MRMs. See Appendix Q.
4.3	Minutes of Management Review Meetings have been recorded and distributed.	In compliance	Draft MRM minutes were sent via email to the management team for review/input, final minutes then distributed to the management team. See Appendix Q.
Procedure: MP-13 Control of Non conformances and Corrective and Preventative Action			
4.2	Following the identification of a non-conformance a CAR has been completed and forwarded to the IWDF Project Manager.	In compliance	One non-compliance has been recorded for Ministerial Statement 562, MP-08 and Management Plan 10. MS 562, MP-08 and MP 10 all require the proponent to hold CLC meetings a minimum of four times a year. For the reporting period only three meetings were held. CAR 007 has been raised.
4.3	Corrective actions and a program for their implementation have been developed for each CAR and reviewed regularly until the action is implemented.	In compliance	A corrective action, modifying MS 562 to allow three meetings a year, has been discussed with the EPA Services. MP-08 and MP 10 will be modified if this occurs.
4.3	Information regarding each CAR has been entered onto the CAR register.	In compliance	Review of CAR register demonstrated that information about each CAR has been entered into the register.
4.3	The progress of each CAR has been presented at a Management Review Meeting.	In compliance	CAR 007 has been discussed at MRMs in the context of resolution options.
4.4	The discovery of inefficiencies and potential non-conformance by staff have been recorded on suggestion sheets and forwarded to the IWDF Project Manager.	N/A	No suggestion sheets were forwarded to the IWDF Project Manager.

Section	Requirement	Status	Evidence / Comment
4.4	Suggestion sheets have been reviewed and valid changes implemented.	N/A	No suggestion sheets were forwarded to the IWDF Project Manager.
4.4	Where a suggestion has not been accepted a written response has been provided to the author detailing why.	N/A	No suggestion sheets were forwarded to the IWDF Project Manager.
4.4	All suggestions and their outcomes have been documented at a Management Review Meeting.	N/A	No formal suggestions have been received during reporting period.
4.5	All CARs and suggestion forms have been retained on the appropriate file.	In compliance	No suggestions forms have been received; review confirmed that all CARs have been retained in the appropriate file.

4.2.2 FMC IWDF Management System Compliance Audit

Table 7 presents the results of the July 2021 to June 2022 internal audit of the FMC implementation of the requirements of the FMC EHSQMS.

As no disposal operation occurred during the reporting period, procedures related to specific disposal activities such as trench excavation, preparation of waste for transport, transport of waste, waste delivery, trench capping, and disposal close-out were not audited.

FMC compliance with the FMC EHSQMS was good with no non-compliances recorded.

Table 7
FMC Environmental Health and Safety and Quality Management System 2021 – 2022 Internal Compliance Audit of Procedures

FMC Operational Procedures

Section	Requirement	Status	Evidence / Comment
OP-01 Assessment of Application for Disposal			
Purpose: Addresses the management of environmental and safety impacts associated with the initial application of waste owners to dispose of wastes at the IWDF and assessment of these applications.			
5.1	<p>Preliminary discussion of inquiries Finance shall notify the FMC Project Manager and Operations Manager of initial inquiries by waste owners. The following shall be discussed with the waste owner by the FMC:</p> <ul style="list-style-type: none"> • Nature of waste (chemical composition and physical form); • Packaging of the waste; • Approximate quantities of waste; • Approximate schedule for disposal; • Requirements for application to dispose (information to be provided to the waste owner, such as Acceptance Criteria); and • Indicative costs. 	In compliance	Review of the FMC Waste Enquiries electronic folder demonstrated that where Finance notified the FMC of an initial enquiry a preliminary phone conversation was held with the waste owner to provide an overview of disposal at the IWDF. The waste owner was then sent the relevant Waste Acceptance Guidelines, a location map and a flow chart describing the disposal process. Due to waste owner 'commercial-in-confidence' evidence cannot be provided.
5.2	<p>Provision of waste acceptance guidelines and proforma The FMC Project Manager shall ensure that the Guidelines for disposal at the IWDF are provided to waste owners enquiring about disposal. The FMC Project Manager or Systems Manager must provide the most up-to-date version of the Guidelines to waste owners.</p>	In compliance	All waste owner enquiries, with appropriate waste, forwarded to the FMC by Finance were provided with waste acceptance guidelines. Prior to sending, the guidelines were checked to ensure the guidelines were up to date.

Section	Requirement	Status	Evidence / Comment
5.3	<p>Assessment of applications to dispose Finance, the FMC Project and Operations Manager (and the RSO, if radioactive waste) shall assess all applications to dispose of waste at the IWDF.</p> <p>Applications shall be received in the form of a completed <i>Waste Acceptance Proforma and Packaging & Transport Proforma</i> as provided in the Guideline documents.</p> <p>Assessment shall include the following:</p> <ul style="list-style-type: none"> • Comparison of details provided by the waste owner on the nature, packaging, and quantity of the waste, as well as alternatives to disposal, with Waste Acceptance Criteria. • Inspection of the waste (where considered to be necessary, in accordance with Operational Instruction OI-01 <i>Waste Inspection</i>). 	In compliance	Review of assessments of waste applications, received during the reporting period confirmed that all required elements were assessed. Waste inspections were also completed where considered necessary.
5.4	<p>Provision of project cost information On request from Finance the FMC Project Manager and the Operations Manager shall provide cost information to Finance. Cost information shall include:</p> <ul style="list-style-type: none"> • trench excavation costs (based on likely waste quantity or a range of quantity scenarios); • FMC management and supervision costs (based on waste quantity and field schedule); and • other costs as requested by Finance. 	In compliance	Where applicable, after discussion with Finance, preliminary waste disposal costs have been provided to waste owners by the FMC. Due to commercial in confidence evidence was sighted but has not been included.
6	<p>Reporting The results of assessment activities shall be documented by the FMC Project Manager (or delegate) and placed on file (as per FMC Management Procedure FMP-02 <i>Record Management</i>.)</p> <p>Assessment results shall be provided to Finance upon request and may be incorporated</p>	In compliance	<p>Inspection confirmed that appropriate assessment records were documented and saved into the FMC Waste Enquiries folder.</p> <p>Review of the Waste Enquiries folder demonstrated that all assessments</p>

Section	Requirement	Status	Evidence / Comment
	into the <i>Operation Environmental and Waste Acceptance Procedures</i> .		undertaken during the reporting period were provided to Finance.
OP-02 Operational Administration, Planning and Approvals			
Purpose: Addresses the management of environmental and safety impacts associated with the planning phase.			
5.1	<p>Set-up project administration and management Upon request by Finance, the FMC Project Manager shall set-up FMC operation administration in accordance with Finance requirements for invoicing and reporting (such as specific cost codes to be used).</p> <p>The FMC Project Manager shall inform the members of the project team of the commencement of activities.</p> <p>The FMC Project Manager shall commence planning activities, in accordance with Finance requirements.</p> <p>The FMC Project Manager shall liaise with the Operations Manager and other managers to address project team actions.</p>	N/A	No waste disposal operation occurred during reporting period.
5.2	<p>Operation planning meetings The FMC Project Manager (and other project staff as appropriate) shall attend regular (e.g., weekly) project planning meetings, as coordinated by Finance. Finance shall chair the meetings and produce minutes of the meetings.</p>	N/A	No waste disposal operation occurred during reporting period.
5.3	<p>Waste Owner-Finance-FMC meetings The FMC Project Manager (and other project staff as appropriate) shall attend regular (e.g., monthly) project planning meetings with waste owner(s), as coordinated by Finance.</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.4	<p>Review of Relevant Legislation, Aspects and Reference Documents The FMC Project Manager and the Systems Manager shall ensure that all project planning documents refer to the most up-to-date versions of reference documents, the legal register and the aspects and impacts register.</p>	In compliance	The Legal Register and the Aspects and Impacts Register were reviewed and updated, if required, in Dec 2021 and May 2022. See Appendices O and P.
5.5	<p>Documentation – Operation Environmental and Waste Acceptance Procedures A document summarising the Operation Environmental and Waste Acceptance Procedures (OEWPs) for proposed disposal operation shall be formulated by the FMC Systems Manager, with input where required from the FMC Project Manager, Environment Manager, Operations Manager, Engineering Manager and RSO.</p>	N/A	No waste disposal operation occurred during reporting period.
5.6	<p>Documentation – Operation Transport Procedures A document summarising the Operation Transport Procedures (OTP) for the proposed disposal operation shall be compiled by the FMC Systems Manager with input from the FMC Project Manager and Operations Manager.</p> <p>The scope of the OTP shall be in accordance with the Packaging and Transport (Reporting) Guidelines. Waste-specific sections of the OTP shall be provided by waste owners, comprising completed proformas and attachments from the Packaging and Transport (Reporting) Guidelines.</p> <p>In cases where the State has taken responsibility for transport, the FMC will provide waste-specific details.</p>	N/A	No waste disposal operation occurred during reporting period.
5.7	<p>Documentation – Operation Health & Safety and Emergency Response Procedures A document summarising the Operation Health & Safety and Emergency Response Procedures (OHS&ERP) for the proposed disposal operation shall be compiled in</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	accordance with Safety Procedure SP-01 Health & Safety Management and Planning.		
5.8	<p>Documentation – Operation Construction Specifications A document summarising the Construction Specifications (CS) for the proposed disposal operation shall be compiled by the Engineering Manager.</p> <p>The scope of the CS shall be to provide operation-specific instructions (specifications and drawings) to the Earthworks Contractor for clearing, excavation, waste covering, capping and rehabilitation of the trench and be developed in accordance with Capping Construction Method Statement (Appendix).</p> <p>Information for input into the CS shall include:</p> <ul style="list-style-type: none"> • trench design and dimensions determined using proposed waste quantities, from the Operations Manager/Engineering Manager; and • geotechnical test results from previous operations and other testing work. 	N/A	No waste disposal operation occurred during reporting period.
5.9	<p>Document Review and Approval Draft operation documents shall be reviewed in accordance with FMC Management Procedure FMP-02 Record Management.</p> <p>Following review by Finance, and any appropriate revision, operation documents shall be re-submitted to Finance who will submit them to the EPA and/or Radiological Council for approval.</p> <p>Following review by the EPA, any appropriate revisions must be undertaken by the appropriate FMC Managers in consultation with Finance.</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.10	<p>Trench Design and Location The design and location of the disposal cell shall be reviewed with consideration to the following:</p> <ul style="list-style-type: none"> • current best practice (national and international developments in landfill and waste management (see OP-09); • trench design reports (e.g., Final Cover Report); • applicability of trench, shaft, tunnel, or another cell design; • quantity and type of waste; • aerial photograph and site topographical data; and • geological data (silcrete and clay thickness data and depth to bedrock from drilling programmes). <p>The favoured trench design and location shall be presented to Finance and RCWA (if radioactive material is to be disposed) for approval and included in the OEWP and CS.</p>	N/A	No waste disposal operation occurred during reporting period.
5.11	<p>Inspection of waste and packaging An inspector delegated by Finance (likely to be the Operations Manager or FMC Project Manager) will inspect the wastes proposed for disposal at the IWDF, to ensure that the waste and its packaging are in accordance with the Acceptance Criteria.</p> <p>The inspection shall be undertaken in accordance with the Operational Instruction OI-01 Waste Inspection.</p>	N/A	No waste disposal operation occurred during reporting period.
5.12	<p>Completion of planning activities – General Management The following general management activities shall be completed prior to commencement of field activities:</p> <ul style="list-style-type: none"> • compilation of a provisional Field Schedule (timetable) which shall be updated, as 	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>appropriate, as the field operation progresses.</p> <ul style="list-style-type: none"> • distribution of field schedule to all parties involved (FMC Managers, RSO and Finance). 		
5.13	<p>Completion of planning activities – health and safety Health and safety planning activities shall be completed in accordance with Safety Procedure SP-01 Health & Safety Management and Planning.</p>	N/A	No waste disposal operation occurred during reporting period.
5.14	<p>Completion of planning activities – environmental The following environmental planning activities shall be completed prior to commencement of transport and disposal of the waste:</p> <ul style="list-style-type: none"> • liaison with laboratory regarding chemical analysis of soil, dust and water samples; • development of sampling program; • liaison with RSO (if radioactive waste is being disposed); • reference to Department of Biodiversity, Conservation & Attractions database Florabase (see EP-01 Vegetation (Flora) Management), with assistance of Botanist. 	N/A	No waste disposal operation occurred during reporting period.
5.15	<p>Completion of planning activities – geotechnical The following geotechnical planning activities shall be completed prior to commencement of relevant field activities:</p> <ul style="list-style-type: none"> • liaison with laboratory regarding geotechnical testing; and • development of geotechnical sampling and testing program. 	N/A	No waste disposal operation occurred during reporting period.
5.16	<p>Completion of planning activities – radiation See Environmental Procedure RP-01 Radiation Management.</p>	N/A	No waste disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.17	<p>Completion of planning activities – operational The following operational planning activities shall be completed prior to commencement of field activities:</p> <ul style="list-style-type: none"> • liaison with the Earthworks Contractor (schedule, personnel, equipment, etc); and • hire of site facilities and equipment if required (dongas, kitchen, offices, decontamination unit, radios, etc). 	N/A	No waste disposal operation occurred during reporting period.
OP-03 Excavation of Disposal Trench			
Purpose: Addresses the management of environmental and safety impacts associated with the excavation of a disposal trench.			
Not required as no disposal operation occurred during reporting period.			
OP-04 Waste Preparation for Disposal			
Purpose: Addresses the management of environmental and safety impacts associated with the preparation of waste for transport to, and disposal at the IWDF.			
Not required as no disposal operation occurred during reporting period.			
OP-05 Waste Loading and Transport			
Purpose: Addresses the management of environmental and safety impacts associated with the loading and transport of waste to the IWDF.			
Not required as no disposal operation occurred during reporting period.			
OP-06 Waste Delivery, Acceptance and Disposal			
Purpose: Addresses the management of environmental and safety impacts associated with the acceptance, delivery, and placement of waste to the IWDF.			
Not required as no disposal operation occurred during reporting period.			
OP-07 Capping, Rehabilitation and Demobilisation			
Purpose: Addresses the management of environmental and safety impacts associated with the capping of the disposal trench at the IWDF and subsequent demobilisation from site.			
Not required as no disposal operation occurred during reporting period.			

Section	Requirement	Status	Evidence / Comment
OP-08 Operation Close-out			
Purpose: Addresses the management of environmental and safety impacts associated with the close-out of the disposal operation at the IWDF in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF.			
Not required as no disposal operation occurred during reporting period.			
OP-09 Ongoing and General Management			
Purpose: Addresses the management of environmental and safety impacts associated with the ongoing management of the IWDF, which occurs irrespective of specific waste disposal operations being undertaken at the site.			
5.1	<p>Project Administration The FMC Project Manager shall manage the finances of the project and invoice Finance in accordance with the cost codes as agreed with Finance.</p> <p>The FMC PM shall inform relevant subcontractors of the cost codes supplied by Finance.</p>	In compliance	IWDF FMC Ongoing Management Task Plan and cost projection, against agreed cost codes, for July 2021 – June 2022 was provided to Finance on the 26 July 2021.
5.2	<p>Tendering Upon request by Finance, the FMC Operations Manager, the Engineering Manager, or the Project Manager shall assist Finance in the engagement of a Contractor to undertake activities at the site.</p>	N/A	No tenders were required during the reporting period.
5.3	<p>Infrastructure Development Upon request by Finance, the FMC Project and Operations Manager shall help Finance in the development of infrastructure at the site. Reference should be made to existing infrastructure plans, where applicable.</p>	In compliance	The FMC assisted Finance with the procurement of infrastructure, such as the replacement generator and diesel storage tank during the reporting period.
5.4	<p>Update of Legislation Upon request by Finance, the FMC Project Manager shall ensure that necessary legislation updates are incorporated into subsequent IWDF documentation, in accordance</p>	In compliance	Legal Register was reviewed and updated in Dec 2021. See Appendix P.

Section	Requirement	Status	Evidence / Comment
	with Finance MP-02 <i>Applicable Laws, Regulations and Other Requirements</i> .		
5.5	<p>Review of Good Practice Upon request by Finance, the FMC Project Manager shall coordinate assistance to Finance for a good practice review, and/or shall ensure that necessary changes are incorporated into project planning and documentation.</p> <p>Review of good practice may include review of national and international developments in the following: landfill capping, hazardous waste management, radioactive waste management, alternative treatment technologies and landfill management.</p>	In compliance	Review of good practice was undertaken in Dec 2021 and May 2022. A review of the IWDF Document Library provided evidence of relevant new or updated national and international documents included. Review of monthly meeting minutes provided evidence that new documents or information is discussed at the monthly meeting with actions, if required, documented.
5.6	<p>Site Visits During periods when disposal operations are not being undertaken, regular site visits shall be undertaken to the IWDF by FMC personnel, at the direction of Finance.</p> <p>Site visits shall coincide with monitoring and maintenance requirements (see below), as a minimum. Site visits shall be recorded using a <i>Site Visit Checklist</i>, (IWDF Form 52).</p>	In compliance	See Appendix X for site visit checklists recorded on IWDF Form 52.
5.7	<p>On-going Monitoring Monitoring shall be undertaken as directed by Finance, in accordance with the <i>monitoring schedule</i>.</p> <p>Monitoring may comprise:</p> <ul style="list-style-type: none"> • groundwater monitoring (Environmental Procedure <i>EP-03 Environmental Monitoring and Instruction EI-01</i>), • radiological monitoring (Radiation Procedure <i>RP-01 Radiation Management</i> and 	In compliance	<p>Ongoing monitoring has been completed and records reviewed.</p> <p>See Appendix L for rehabilitation monitoring records, Appendix U for groundwater monitoring results, Appendix M for capping monitoring records.</p>

Section	Requirement	Status	Evidence / Comment
	<p>Instruction <i>RI-01 Radiation Monitoring</i>),</p> <ul style="list-style-type: none"> trench capping monitoring (Environmental Instruction <i>EI-03 Capping Monitoring</i>), rehabilitation monitoring (Environmental Procedure <i>EP-05 Rehabilitation Management</i> and Instruction <i>EI-04</i>). 		
5.8	<p>Site Investigations</p> <p>The FMC Project and Operations Manager shall ensure that sufficient data is available to provide support for the management of the IWDF site.</p> <p>Such data may include:</p> <ul style="list-style-type: none"> geological drilling data (geological unit thicknesses and depth to bedrock). surface topographical data (aerial photography and contour data). climate data. groundwater monitoring data (from groundwater monitoring bores). radiation monitoring data. <p>If an area is identified where it is deemed that insufficient data is available to provide support for the management of the site (e.g., too few monitoring bores to adequately monitor potential groundwater impacts due to expansion of the disposal area) the IWDF Project Manager shall make recommendations to Finance for the implementation of further investigations at the IWDF.</p>	In compliance	Review of available data and interview with Operations Manager confirmed that data was considered adequate for the management of the IWDF during the reporting period. All available data is controlled in the IWDF Document Library.
5.9	<p>Infrastructure and Equipment Maintenance</p> <p>The Operations Manager shall ensure that equipment and facilities (listed on IWDF-Forms-41 and 42) at the IWDF undergo regular maintenance in accordance with FMC Management Procedure <i>FMP-06 – Control and Maintenance of Equipment</i>. Equipment</p>	In compliance	As no disposal operation occurred during reporting period equipment and facilities maintenance was recorded on the site visit checklist. See Appendix X for Site Visit

Section	Requirement	Status	Evidence / Comment
	<p>maintenance shall be recorded using IWDF-Forms 40, 41 and 42.</p> <p>The Operations Manager shall ensure that sufficient water, fuel, and food supplies are maintained at the site.</p> <p>The Operations Manager shall maintain a <i>Dangerous Goods Storage inventory</i> for fuels and other hazardous materials stored at the site (IWDF-Form 51).</p>		<p>Checklists and see Appendix Y for <i>Dangerous Goods Storage Inventory</i> for Oct 2021 and April 2022 (IWDF-Form 51).</p>
5.10	<p>Access Road Maintenance</p> <p>The Operations Manager, the Engineering Manager and the FMC Project Manager shall assist Finance to determine when access road maintenance activities are required.</p> <p>The access road shall be inspected regularly (e.g., every 6 months during monitoring visits). Road inspection shall be recorded using the Access Road Condition Report Form (IWDF-Form-44)</p>	In compliance	See Appendix T for Access Road Condition Reports.
6	<p>Records and Reporting</p> <p>The results of on-going activities shall be documented by the FMC Project and Operations Managers (or others, as appropriate) and placed on file (as per FMC Management Procedure FMP-02 Record Management).</p> <p>The FMC Project Manager shall ensure that results of all environmental and other monitoring are forwarded to Finance upon request (generally annually), for input to PCR reporting by Finance. Letters or records shall be submitted to Finance detailing recommendations for additional investigations or site activities, because of reviews or site inspections.</p>	In compliance	<p>Monitoring records were provided to Finance with the monthly report post the site visit – all records are kept in the IWDF document library. Site visit and monitoring records are also included in the annual PCR.</p> <p>See Section 5 of this PCR.</p>

Section	Requirement	Status	Evidence / Comment
OP-10 Operation Site Management			
Purpose: Must be followed for general management at the IWDF site during disposal operations.			
Not required as no disposal operation occurred during reporting period.			
OI-01 Waste Inspection			
Purpose – Must be followed during inspections of waste proposed for disposal at the IWDF.			
Not required as no inspections of waste were completed during the reporting period.			

FMC Management Procedures

Section	Requirement	Status	Evidence / Comment
FMP- 01 Document and Data Control			
Purpose - This procedure addresses document and data control at the IWDF and at the Facility Management Contractor (FMC) office(s), in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF and Finance Management Procedure MP-06 Document & Data Control, to enable the following requirements to be met.			
5.1	Finance Document Control Requirements Finance document control requirements are outlined in Finance-MP-06 – Document and Data Control. The FMC Systems Manager shall ensure that all Finance controlled documents, as defined in the Finance Document Control Matrix (see MP-06) are controlled in accordance with the matrix.	In compliance	Controlled documents were stored on the Finance Records Management System, FMC server in the IWDF Document Library or appropriate IWDF project folder. See Appendix S for Finance and FMC Document Control Matrix.

Section	Requirement	Status	Evidence / Comment
5.2	<p>FMC Controlled Documents Documents defined as Controlled Documents are given in the FMC IWDF Document Control Matrix. Controlled documents shall be prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the FMC IWDF Document Control Matrix.</p> <p>The person responsible for the control (storage and distribution) of documents is referred to as the Document Controller, as defined in the matrix.</p>	In compliance	<p>Review confirmed that controlled documents were prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the FMC IWDF Document Control Matrix. See Appendix S.</p> <p>Where documents are prepared by the FMC, emails from Finance approving the document were sighted by the auditor.</p>
5.3	<p>Document Registration FMC-controlled project documents shall be registered by the preparer with the Systems Manager, who shall use an FMC IWDF Document Register (IWDF-Form-16) to reflect the status of all controlled documents. Document numbers/identifiers shall be obtained from Finance for all Finance controlled documents.</p> <p>An FMC identifier shall be used for FMC controlled documents (e.g., FMC procedures). Separate registers may be produced for each disposal operation and for ongoing general management.</p> <p>Separate registers <u>may</u> also be produced for different types of documents, such as:</p> <ul style="list-style-type: none"> • FMC Procedures • FMC QA Forms • Manuals • Radiation Reports. 	In compliance	<p>Review confirmed all FMC prepared documents have been allocated a unique document number such as DF12020-001-0PCR Revision 1 and where necessary a document number is obtained from Finance. This is demonstrated in Appendix K CLC Minutes.</p> <p>It should be noted that the FMC, Aurora Environmental, uses project document control registers for all their projects. These document control registers contain similar elements as IWDF-Form-16 therefore the substitute was considered suitable</p>

Section	Requirement	Status	Evidence / Comment
5.4	<p>Distribution of Controlled Documents Documents produced by the FMC on behalf of Finance shall be distributed as outlined in the IWDF Document Control Matrix. A record of the distribution of all FMC controlled documents shall be made by saving the distribution email in the appropriate folder.</p>	In compliance	Review of appropriate folders confirmed that distribution emails were saved in the appropriate folder.
5.5	<p>Document Revision Changes to internally generated controlled documents shall be prepared, reviewed, revised, approved, controlled, stored, and distributed as outlined in the FMC IWDF Document Control Matrix.</p> <p>Controlled documents shall use numerical revision codes. For all documents issued as drafts, the revision should include a point e.g., 1.1 and then should use the next whole number for approved documents. Electronic documents shall, as a minimum, be dated, with reference to the fact that any printed copy is uncontrolled.</p> <p>A request for a change to a document shall be made in writing to the Systems Manager/Document Controller (e.g., using a Corrective Action Request, CAR IWDF-Form-10).</p>	In compliance	A review of the controlled documents prepared during the reporting period verified that all documents were prepared, reviewed, revised, approved, controlled, stored, and distributed, where required, as outlined in the FMC IWDF Document Control Matrix.
5.6	<p>Document Review and Approval All controlled documents produced by the FMC shall be reviewed by the FMC Project Manager and other appropriate technical managers, prior to release to Finance for approval, as shown in the FMC IWDF Document Control Matrix.</p> <p>Electronic documents shall be updated to show the date and initials of the approver/reviewer. All emails containing reviewed documents should be saved in the appropriate electronic folder.</p>	In compliance	<p>A random sample of documents and associated folders were reviewed which verified that documents have been reviewed by the FMC IWDF Project or Project Director before they are provided to Finance.</p> <p>Where electronic documents have been reviewed/approved via email the email is</p>

Section	Requirement	Status	Evidence / Comment
			saved in the appropriate Management System email folder.
5.7	<p>Obsolete Documents</p> <p>When documents are no longer required, or have been superseded by subsequent versions, they shall be made obsolete, upon instruction of the document controller by moving the document to the System archive folder. Superseded documents shall be retained in accordance with the Quality Procedure <i>FMP-02 Record Management</i>.</p>	In compliance	Hard copy documents are no longer used, and random review confirmed that superseded electronic system documents are archived in an archive folder on the FMC server.
5.8	<p>Location of Documents</p> <p>The master copies of documents shall be stored as outlined in the FMC Document Control Matrix. External reference documents (such as Codes of Practice, Australian Standards, etc.) shall be reviewed as a minimum during the planning phase of a disposal operation to ensure up-to-date versions are referenced in project documentation and that up-to-date copies are distributed.</p>	In compliance	Random review confirmed master copies of controlled documents are stored in the appropriate electronic folder or for external documents in the IWDF Document Library on the FMC server.
FMP- 02 Records Management			
Purpose - This procedure addresses the control of all records at the IWDF and at the Facility Management Contractor (FMC) office(s), in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF and the Finance Management Procedure MP-07 Management of Records, to ensure that records associated with the management of the IWDF are legible, accessible, traceable, and protected against loss or damage.			
5.1	<p>Finance Record Control Requirements</p> <p>Finance record management requirements are outlined in <i>Finance-MP-07 – Management of Records</i>. Procedures for identification of records for retention, storage requirements and document retention periods shall be adhered to, as defined in Finance-MP-07.</p>	In compliance	Review of monthly reports confirmed that all critical documents such as monitoring reports etc. were provided to Finance with the monthly reports and are then recorded on the Finance Records Management System. All monitoring reports for the reporting period are also included in this

Section	Requirement	Status	Evidence / Comment
	<p>The Systems Manager shall ensure that all appropriate records are forwarded to Finance, as defined in the Finance Archiving Schedule (see MP-07).</p>		<p>PCR which will be stored according to the Finance Retention and Disposal Schedule.</p>
5.2	<p>IWDF Site Record Management The following procedures relate to record management at the IWDF Site office during disposal operations or other extended occupation of the site.</p> <p>5.2.1 General Forms (proforma templates) shall be used in the recording of correspondence, field data, meetings/briefings and other activities relating to management of the IWDF.</p> <p>The Systems Manager shall ensure that the most-up-to-date revisions of forms are available and that they are listed on a Document Register (IWDF-Form-16).</p> <p>Paper copies of forms may be kept, where necessary (e.g., if electronic access is not possible for a limited period), but it is the responsibility of the user to ensure that it is the latest version of the form.</p> <p>5.2.2 Correspondence Control Correspondence includes hand-delivered correspondence and e-mails.</p> <p>All project-related incoming correspondence shall be registered on an Incoming Document Register (IWDF-Form-23) and filed in a Project Correspondence File.</p> <p>All project-related outgoing correspondence shall be recorded on an Outgoing Document Register (IWDF-Form-24) and filed in the Project Correspondence File.</p>	N/A	<p>No disposal operation occurred during reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>5.2.3 Chain of Custody A Chain of Custody Record (IWDF-Form-01) shall accompany all samples taken from the site for receipt by an analytical laboratory. Chain of Custody Records shall be registered on a Chain of Custody Register (IWDF-Form-02) and filed in the appropriate Project File.</p> <p>5.2.5 Filing and Storage All site records (correspondence, memos, telephone records, field notes, etc.) shall be filed in the appropriate project file, as outlined in the appropriate IWDF Filing Index (IWDF-Form-04), located in the site office or trench office, for the duration of the project site activities.</p> <p>At the end of a field project, all site records must be returned to the FMC contractor's office(s) in Perth and stored under the office record management system(s) (see below).</p>		
5.3	<p>FMC Office Record Management The following procedures relate to record management at the FMC offices during ongoing management or operational planning of IWDF activities.</p> <p>5.3.1 General Record keeping and management outside the IWDF (i.e., in the FMC offices) shall be undertaken in accordance with the procedures outlined in Section 5.2 for the IWDF site.</p> <p>However, different forms and registers (e.g., from the FMC company's quality system) may be used if they are deemed to be equivalent by the Systems Manager and provide the same level of quality control.</p>	In compliance	Random review confirmed FMC IWDF records were contained within the appropriate IWDF project folder. All records not forwarded to Finance are stored in accordance with the FMC company Quality Management System requirements.

Section	Requirement	Status	Evidence / Comment
	<p>5.3.2 Filing and Storage All site and office records (correspondence, memos, telephone records, field notes, etc.) shall be filed in the appropriate project file, as outlined in the applicable IWDF Filing Index (IWDF-Form-04 or equivalent), located in each FMC office.</p> <p>All site records that are not requested by the Systems Manager for forwarding to Finance for archiving as defined in the Finance Archiving Schedule (see MP-07), shall be stored in accordance with FMC company procedures.</p>		
<p>FMP-03 Training and Competency</p>			
<p>Purpose - This procedure addresses the training of personnel involved with all operational activities at, or associated with, the IWDF in accordance with the Finance Environmental, Health and Safety and Quality Policy for the IWDF. The purpose of the procedure is to ensure that all FMC staff involved with operations at, or associated with, the IWDF, are appropriately trained and qualified, including:</p> <ul style="list-style-type: none"> • increasing awareness of potential environmental and safety impacts of each position/role: and • understanding the requirements of the FMC procedures and management system. 			
<p>5.1</p>	<p>IWDF Management System Training/Induction</p> <p>5.1.1 Responsibilities Finance (or delegate) is responsible for training FMC personnel involved in IWDF activities in the implementation of the Finance Policy, Manual and relevant Finance Management Procedures.</p> <p>The FMC Systems Manager is responsible for training all FMC personnel (and the Earthworks Contractor Supervisor) involved in IWDF activities in the implementation of the FMC Operational, Environmental, Safety and Quality Procedures.</p> <p>5.1.2 Scope</p>	<p>In compliance</p>	<p>Review of the 2021 - 2022 Training Register/Schedule confirmed appropriate training was completed for all visitors to the IWDF and FMC personnel with a specific task at the IWDF.</p> <p>Four general inductions for personnel undertaking a site visit to the IWDF during the reporting period were completed.</p> <p>There were no new FMC personnel during the reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>Roll-out training/new employee induction on the FMC management system shall provide details on:</p> <ul style="list-style-type: none"> • requirements of the system • importance of complying with the system • potential environmental and safety impacts of position • how to incorporate this knowledge into daily work practices. <p>5.1.3 Identification of training requirements The Systems Manager and Project Manager shall be responsible for identifying the training needs of FMC personnel. The identification of training needs shall be based on the:</p> <ul style="list-style-type: none"> • tasks the employee or contractor is required to undertake or is responsible for; and • necessary level of performance. <p>A Competency Matrix will identify the training requirements for all FMC personnel. This matrix will be used to undertake analysis of ongoing training needs.</p> <p>A training schedule will be developed by the Systems Manager and Project Manager for all FMC employees.</p> <p>5.1.4 Review of Training requirements Training reviews will be undertaken at least once a year, or under the following circumstances:</p> <ul style="list-style-type: none"> • when the job scope of an employee changes significantly; • if an employee continually fails to meet requirements; • after a major accident or incident; and/or • following changes to the management system. 		

Section	Requirement	Status	Evidence / Comment
	<p>5.1.5 Training Records FMC training shall be recorded using the Management System Induction Form (IWDF-Form-48) and if necessary (e.g., for large numbers of attendees), an Attendance Sheet (IWDF-Form-25). The Systems Manager shall ensure that all FMC personnel are appropriately qualified and trained for their activities.</p> <p>Qualifications shall be recorded on a Competency Plan for each FMC employee (IWDF-Form-12a).</p>		
5.2	<p>On-site Operation-Specific Training</p> <p>5.2.1 Responsibilities The FMC Systems Manager and Operations Manager shall be responsible for identifying and reviewing all operation-specific training needs for all FMC personnel.</p> <p>The FMC Systems Manager and Site Safety Officer (and Radiation Safety Officer for radioactive waste activities) are responsible for undertaking all operation-specific site inductions.</p> <p>5.2.2 Scope The following inductions shall be undertaken:</p> <ul style="list-style-type: none"> • general IWDF site activities (General Safety Induction Form, IWDF-Form-32) • waste preparation, packaging, and handling activities (Waste Handling Safety Induction Form, IWDF-Form-33) • transport of waste to the IWDF (Transport Induction Form, IWDF-Form-37). <p>Site inductions shall provide details on:</p> <ul style="list-style-type: none"> • general rules and background information to activities; 	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • health and safety issues - hazards and controls (based on the IWDF Aspects (Health and Safety) and Impacts Register); • emergency response procedures; • environmental issues (based on the IWDF Aspects and Impacts (Environmental) Register); • operation-specific procedures/tasks; and • generic training materials will be available on the electronic system (IWDF Induction Handbooks) to accompany the Training procedure (FMP-03) but will also be updated on an operation-specific basis and stored on Operation project files. <p>Visitors and short-term personnel (such as maintenance contractors) shall undergo specifically tailored general induction (General Safety Induction Form, IWDF-Form-32).</p> <p>5.2.3 Identification of training requirements The Systems Manager and Operations Manager shall be responsible for identifying operation-specific induction and training needs.</p> <p>The identification of training needs shall be based on:</p> <ul style="list-style-type: none"> • tasks the employee or contractor is required to undertake or is responsible for; and • the necessary level of performance. <p>A Competency Matrix will be developed to identify the training requirements for all FMC personnel and contractors.</p> <p>An operation training schedule will be developed by the Systems Manager and Operations Manager for all FMC employees.</p>		

Section	Requirement	Status	Evidence / Comment
	<p>5.2.4 Review of training / competency requirements Training reviews will be undertaken at the commencement of an operation, or under the following circumstances:</p> <ul style="list-style-type: none"> • when the job scope of an employee changes significantly; • if an employee continually fails to meet requirements; • after a major accident or incident; and • following changes to the scope of an operation. <p>5.2.5 Training/Competency Records FMC induction training shall be recorded using the forms specified in 5.2.2 and if necessary (for large numbers of attendees), an Attendance Record (IWDF-Form-25).</p> <p>Competency tests shall be undertaken as part of all inductions to ensure that the induction has been effective.</p> <p>The Operations Manager shall ensure that all FMC personnel are appropriately trained for their activities on site.</p> <p>Training qualifications shall be recorded on the Operational Training Register (IWDF-Form-12b).</p> <p>5.2.6 Review of Training Effectiveness The effectiveness of training shall be reviewed through site audits and inspections, as outlined in FMC Management Procedure FMP-04 System Auditing and Compliance and Safety Procedure SP-02 Operation Site Safety Management.</p>		

Section	Requirement	Status	Evidence / Comment
FMP- 04 System Audits			
Purpose - This procedure addresses the internal auditing of Facility Management Contractor (FMC) activities at, or associated with, the IWDF, to ensure compliance with the requirements of the Finance Management System and FMC procedures for the IWDF.			
5.2	<p>Audit Frequency/Schedule The scheduling of audits shall be determined by the FMC Project Manager and the Systems Manager. This may be done using an Audit Schedule IWDF-Form-50.</p> <p>Ongoing FMC Operational, Environmental, Safety and Quality Procedures shall be audited annually.</p> <p>Operation-specific Operation Procedures (and associated Operational, Environmental, Safety and Quality Procedures) shall be audited at least once during a disposal operation. Finance shall be informed of the audit schedule. Personnel to be audited shall be notified of a pending audit at least two weeks before the audit commences.</p>	In compliance	See Appendix V for audit schedule.
5.3	<p>Audit Scope The basic scope of system audits shall be defined in a System Audit Checklist and shall include:</p> <ul style="list-style-type: none"> • activities to be audited (based on the significance of the activity and previous audit results); • documentation and records to be reviewed; • personnel to be interviewed and/or involved in the audit; and • methods of evidence collection and reporting. 	In compliance	All applicable auditable elements of the IWDF Management System were audited during this reporting period.
5.4	Audit Team	In compliance	Internal audits were undertaken by the Systems Manager who is a qualified auditor.

Section	Requirement	Status	Evidence / Comment
	<p>Each audit shall be undertaken by an audit team, comprising the Systems Manager and at least one other suitably qualified auditor. This will ensure that the auditor of a particular section of the system is external to the implementation of that section.</p>		
5.5	<p>Audit Reporting and Follow-up Audits shall be recorded on the <i>Audit Register (IWDF-Form-49)</i>.</p> <p>Non-conformances shall be recorded using <i>Corrective Action Requests (CAR) (IWDF-Form-10)</i>.</p> <p>Audit records/findings shall be documented in an <i>Audit Report</i> and used to determine the level of conformance achieved.</p> <p>The audit report shall contain the following:</p> <ul style="list-style-type: none"> • conformities and nonconformities; • records of CARs resulting from the audit (as generated by auditees); • follow-up of previous audit findings; • conclusions and recommendations for changes to system for consideration at Management Review (see below). • effectiveness of the system in achieving Finance objectives and targets. <p>A draft of the report shall be forwarded to the FMC Project Manager for review, prior to submission to Finance for review. A meeting shall then be held between the Finance Project Manager, Systems Manager, FMC Project Manager, and auditor to discuss the findings of the audit and to develop a plan to implement and assess the effectiveness of the necessary corrective actions.</p>	In compliance	<p>Audit Register was sighted verifying that it included all annual audits from 2008 to 2022.</p> <p>This audit table comprises report results for this reporting period.</p> <p>Audit findings were provided to Finance as part of the draft PCR for the reporting period.</p>

Section	Requirement	Status	Evidence / Comment
FMP- 05 Control of Non-Conformances			
Purpose: This procedure addresses the reporting, recording, investigating and implementation of system non-conformances and corrective actions associated with the management of the IWDF, to ensure that any FMC system deficiencies are corrected or prevented.			
5.2	<p>Reporting of System Non-Conformances When a system non-conformance is identified a <i>Corrective Action Request (CAR)</i> form (IWDF-Form-10) shall be completed by the identifier and forwarded to the Systems Manager for action. The CAR shall be registered on a <i>CAR Register</i> (IWDF-Form-11) by the receiver.</p> <p>Potential non-conformances and suggestions for improvement may also be reported using a CAR.</p>	N/A	No IWDF FMC system non-compliances were identified during reporting period.
5.3	<p>Development and Implementation of Corrective/Preventive Actions The Systems Manager shall assess the CAR, in conjunction with the Project Manager (for off-site issues) or the Operations Manager (for on-site issues).</p> <p>Corrective/preventive actions to address the non-conformance shall be formulated and detailed on the CAR.</p> <p>A program for the implementation of the corrective/preventive actions shall be developed and reviewed regularly until the action is implemented, found to be effective and closed out.</p> <p>All procedures or other documentation shall be updated and redistributed accordingly, in accordance with FMC Management Procedure FMP-01 <i>Document and Data Control</i>.</p>	N/A	No IWDF FMC system non-compliances were identified during reporting period.

Section	Requirement	Status	Evidence / Comment
5.4	<p>Management Review All CARs and their implementation shall be reported at IWDF Management Review meetings, in accordance with Finance Management Procedure MP-12 Management Review.</p>	Partial compliance	As the audit report had not been completed before the 2 June 2022 MRM results will be reported at the Management Review Meeting to be held Dec 2022.
6.	The Systems Manager shall ensure that all records are filed in accordance with FMC Management Procedure FMP-02 Record Management.	In compliance	Random review confirmed records were filed in the appropriate IWDF FMC Project folders.
FMP- 06 Control and Maintenance of Equipment			
Purpose: This procedure addresses the control, calibration and maintenance of quality-critical inspection, measuring and test equipment associated with the operational management of the Intractable Waste Disposal Facility (IWDF).			
5.1	<p>Identification and Registration of Monitoring, Measuring and Test Equipment The Operations Manager and the user (or supervisor) of a piece of all monitoring, measuring and test equipment shall be responsible for ensuring that the equipment is calibrated or checked to manufacturers recommendations.</p> <p>The Operations Manager shall ensure that all FMC monitoring, measuring, and test equipment is recorded on Equipment Maintenance and Calibration List (IWDF-Form-40) stored in the Operation Manager’s office files. Separate lists may be produced on an operation-specific basis.</p> <p>Operation lists shall be stored at the IWDF site during site activities. The user and Operations Manager shall ensure that all equipment has a precision and sensitivity appropriate with the requirements of the monitoring, measurements, or tests.</p>	In compliance	Equipment Maintenance and Calibration List (IWDF-40) was sighted for water monitoring equipment used during Oct 2021 water monitoring event.

Section	Requirement	Status	Evidence / Comment
5.2	<p>Calibration and Checking of Monitoring, Measuring and Test Equipment All equipment requiring calibration shall be calibrated in accordance with manufacturer’s instructions. Hired equipment, or equipment used by a subcontractor shall be provided with calibration documents by the supplier and these shall be checked by the user.</p> <p>Equipment owned by Finance or the FMC, shall be calibrated by the user of the equipment. The calibration method and history of each piece of equipment shall be recorded using a <i>Maintenance and Calibration Register (IWDF-Form-41)</i>. Records provided by the supplier of a piece of equipment should be attached to this checklist.</p>	In compliance	Equipment Maintenance and Calibration Record (IWDF-40) was sighted for water monitoring equipment used during Oct 2021 water monitoring event.
5.3	<p>Non-Conformances Items of equipment that do not pass their calibration/checking or maintenance checks shall be clearly tagged to identify them as non-operational and removed from use.</p> <p>Such equipment shall only be reused upon positive results from re-calibration or maintenance. If equipment is faulty, a corrective action report (CAR) shall be raised and corrective actions undertaken, in accordance with Quality Procedure FMP-05 System Control of Non-Conformances.</p>	N/A	Interview with Operations Manager and review of documentation confirmed that no equipment failed calibration/checking.
5.4	<p>Other Equipment Maintenance All equipment shall be maintained to ensure a safe working environment. The Operations Manager shall ensure that Finance or FMC owned equipment that is used for IWDF activities and that requires maintenance is recorded on the <i>Equipment Maintenance and Calibration List (IWDF-Form-40)</i>. Separate lists may be produced on an operation-specific basis.</p> <p>The user and Operations Manager shall ensure that all equipment is suitable for its intended use. The maintenance method and history of each piece of equipment shall be</p>	In compliance	<p>Equipment Maintenance and Calibration Record (IWDF-40) was sighted for water monitoring equipment used during Oct 2021 water monitoring event.</p> <p>As the equipment is owned by the FMC and is used by other projects the master maintenance and calibration records are</p>

Section	Requirement	Status	Evidence / Comment
	recorded using a <i>Maintenance and Calibration Register (IWDF-Form-41)</i> . Records provided by a maintenance contractor should be attached to this checklist. The maintenance of contractor-owned equipment shall be the responsibility of the contractor.		maintained within the FMC's company management system.

FMC Environmental Procedures

Section	Requirement	Status	Evidence / Comment
EP-01 Vegetation (Flora) Management			
Purpose: Addresses the management of vegetation at the IWDF.			
5.1	<p>Flora Surveys</p> <p>Previous floristic assessments of the site reserve and the access road reserve have not identified any Declared Rare Flora (DRF) to be present (PVG Environmental, 2014). One priority species was identified. The locations of the priority species have been mapped (PVG Environmental, 2014). These locations shall be reviewed prior to any clearing activities. Clearing in areas identified as containing rare or priority species shall be avoided.</p> <p>The “Declared Rare Flora Database” is updated annually. Prior to any clearing (e.g., prior to the commencement of an operation), the list current at the time of development should be searched to determine the conservation status of rare and priority flora species and to check if species have been added or removed from the list.</p> <p>If significant changes in the conservation status of flora is likely to be found at the IWDF occur, or as otherwise directed by Finance, a floristic reassessment of the site may be undertaken.</p>	In compliance	<p>The location of any priority species is recorded on the monitoring locations figure provided at Figure 4 of this PCR.</p> <p>Florabase was consulted Oct 2021 and the Flora Identification Kit was reviewed prior to the October monitoring event.</p> <p>No clearing occurred during the audit / reporting period.</p>

Section	Requirement	Status	Evidence / Comment
5.2	<p>Clearance of Vegetation Unnecessary clearance or disturbance of native flora shall always be avoided. Clearance of vegetation shall only be undertaken under the direction of the Operations Manager, with advice from the Environment Manager and Botanist.</p> <p>The following clearing shall be permitted following approval by the Operations Manager:</p> <ul style="list-style-type: none"> • Firebreaks • New disposal trenches and surrounding areas required for vehicle access • Other areas of development as approved by Finance or the Operations Manager. <p>If an area is to be cleared that lies close to, or at, an area where a priority species has been identified, the priority species plant(s) shall be identified, marked in the field, and avoided if at all possible.</p> <p>If a priority species plant must be cleared, DWER shall be informed of the clearance, prior to clearing (although this is not a statutory requirement).</p> <p>Off-road (track) vehicle usage is strictly prohibited, without prior consent by the Operations Manager.</p> <p>The identification of rare flora or priority species shall be aided wherever possible using flora identification kits (see below).</p>	N/A	No clearing occurred during the reporting period.
5.3	<p>Flora Identification Available flora identification kits shall be maintained (and updated as necessary) for priority species (and any rare flora that may be identified in the future) known to occur at the IWDF.</p>	In compliance	Florabase was consulted October 2021 and the Flora Identification Kit was reviewed prior to the October monitoring event.

Section	Requirement	Status	Evidence / Comment
	<p>Where possible, the flora identification kits shall be referred to prior to clearing activities on the existing site to identify rare flora or priority species which may be impacted by proposed clearing.</p> <p>If there is uncertainty in the identification of flora in an area designated for clearing, a botanist may be brought up to site prior to significant clearing activities, particularly where priority species may be in, or close to, the area to be cleared.</p> <p>If rare flora or priority species are identified, efforts will be made to clear in alternative areas.</p>		<p>No clearing occurred during the audit / reporting period.</p>
5.4	<p>Weed Identification</p> <p>The weed identification kit shall be maintained for weeds (non-native plants, which may have a detrimental impact on local flora) that are known, or likely to occur at the IWDF.</p> <p>Where possible, the weed identification kit shall be referred to during activities on the existing site. If weeds are identified, they shall be removed at the direction of the Operations Manager (and botanist, if required).</p>	In compliance	Weed Identification Kit was reviewed Oct 2021.
EP- 02 Fauna Management			
Purpose: Addresses management of native fauna at the IWDF.			
5.2	<p>Native fauna is protected by law. Unauthorised killing or interference with native fauna is prohibited. All site personnel shall notify the Environment Manager or Operations Manager of potential or actual impacts on native fauna and habitat areas.</p>	In compliance	<p>Review of the incident records confirmed that no incident reports related to native fauna were made during the reporting period.</p>

Section	Requirement	Status	Evidence / Comment
5.3	<p>Clearance of Vegetation Unnecessary clearance or disturbance of vegetation (the natural habitats for native fauna) shall always be avoided.</p> <p>Off-road vehicle usage is strictly prohibited, unless authorised by the Operations Manager.</p> <p>Clearance of vegetation shall only be undertaken under the direction of the Operations Manager.</p>	N/A	No clearing occurred during the reporting period.
5.4	<p>Fauna Injuries or Deaths Fauna injuries or deaths shall be treated as environmental incidents and reported to the Environment Manager or Operations Manager.</p> <p>Management of environmental incidents is detailed in Environmental Procedure EP-09 Environmental Incident Management</p>	N/A	No fauna death or injuries were reported during the reporting period.
5.5	<p>Road Kills Drivers of vehicles within the IWDF site shall be aware of native fauna when driving on all tracks and roads.</p> <p>Where possible, roadkill shall be removed from the road, to prevent animals feeding on the carcass also being run down.</p>	N/A	Review of the incident records confirmed that no incident reports related to roadkill were made during the reporting period.
5.6	<p>Open Excavations and Boreholes Open trenches or excavations shall have an egress to allow trapped animals to exit the trench. (All disposal trenches have a ramp as part of the current trench design).</p>	In compliance	The Operations Manager confirmed that all monitoring bores were capped.

Section	Requirement	Status	Evidence / Comment
	Any drill hole, borehole or monitoring bore shall be filled, plugged, or capped, after completion, to avoid unnecessary trapping of animals in the open hole.		
5.7	<p>Feral Animals and Pets Feral animals shall be discouraged from the camp area, wherever possible, by the careful management of camp waste (to avoid odours, which may attract feral animals).</p> <p>Management of camp waste is detailed in Environmental Procedure EP-07 Waste Management.</p> <p>Pets (domestic animals) are not permitted on-site.</p>	N/A	Verbal communication with the Operations Manager and other IWDF personnel confirmed that no feral animals were sighted at the camp area while at the IWDF during the reporting period.
EP-03 Environmental Monitoring Management			
Purpose: Addresses the monitoring of the impact of waste disposal activities at the IWDF on the environment.			
5.1	<p>Scheduling and Management of Monitoring Programs FMC shall coordinate all IWDF ongoing monitoring programs, through yearly monitoring schedules.</p> <p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules. The FMC Environment Manager shall ensure that monitoring records are appropriately registered, distributed and filed in accordance with the specific instruction for the monitoring.</p> <p>5.2.1 Groundwater Monitoring Procedures for ongoing groundwater monitoring are given in Environmental Instruction EI-01.</p>	In compliance	<p>Monitoring records verify that all monitoring, required during the reporting period, was undertaken according to the schedule.</p> <p>See Appendix L for rehabilitation monitoring records, Appendix U for groundwater monitoring results, Appendix M for capping monitoring records.</p>

Section	Requirement	Status	Evidence / Comment
	<p>5.2.2 Radiation Monitoring Procedures for ongoing radiation monitoring are given in Radiation Instruction RI-01. Ongoing radiation monitoring will be undertaken every 5 years.</p>		Gamma radiation monitoring was not required during the reporting period.
5.3	<p>Operation-Specific Monitoring</p> <p>5.3.1 Groundwater Monitoring Groundwater monitoring shall be undertaken prior to the onset of waste disposal activities and following waste disposal activities, for any waste disposal operation. This may coincide with the ongoing groundwater monitoring.</p> <p>5.3.2 Radiation Monitoring Radiation monitoring shall be undertaken prior to the onset of waste disposal activities and following waste disposal activities, for any waste disposal operation involving the disposal of radioactive wastes. Procedures for radiation monitoring are given in Radiation Instruction RI-01.</p> <p>5.3.3 Soil Sampling Pre-disposal and post-disposal soil samples shall be collected from locations around each disposal trench. Procedures for soil sampling are given in Environmental Instruction EI-02 with reference to the Operation Environmental and Waste Acceptance Procedures (OEWP) for the specific waste disposal operation.</p> <p>5.3.4 Dust Sampling Pre-disposal and syn-disposal dust monitoring shall be undertaken at locations around each disposal trench.</p>	N/A	<p>Groundwater monitoring was completed Oct 2021, and Apr 2022. See Appendix U.</p> <p>Radiation monitoring was not required during reporting period.</p> <p>As a disposal operation did not occur during the reporting period no other sampling or monitoring was required.</p>

Section	Requirement	Status	Evidence / Comment
	Procedures for dust monitoring are given in Environmental Instruction EI-02 with reference to the Operation Environmental Procedures (OEP) for the specific waste disposal operation.		
5.4	<p>Specific/Validation Sampling</p> <p>In the event of a spill, or suspected spill of waste material, additional validation sampling shall be undertaken as outlined in Environmental Instructions EI-01, 02 and Radiation Instruction RI-01 with reference to the Operation Environmental and Waste Acceptance Procedures (OEWP) for the specific waste disposal operation.</p>	N/A	Review of incident reporting confirmed no spills occurred during the reporting period.
5.6	<p>Review of Monitoring Program</p> <p>The monitoring program shall be reviewed annually, as part of the annual Finance Management Review Meeting (Finance MP-12). Review may include the details of the program (such as appropriate numbers of monitoring bores and locations of radiation surveys).</p>	In compliance	The monitoring program was reviewed by the FMC and presented at the Management Review Meetings. See Appendix Q for Management Review Meeting minutes.
6.	<p>The results of FMC monitoring activities shall be documented and placed on the appropriate file (as per FMC Management Procedure FMP-02 Record Management). The Radiation Safety Officer and the Environment Manager shall report all results of FMC monitoring to the FMC Project Manager.</p> <p>The Project Manager shall forward results of all FMC environmental monitoring to the Finance Project Manager within 14 days of monitoring (or within 14 days of receipt of monitoring results). If abnormalities or exceedances are identified, the Finance Project Manager shall be informed as soon as practicable.</p> <p>Monitoring results shall be reported in the Performance & Compliance Report.</p>	In compliance	All monitoring results were provided to Finance with the monthly report after the monitoring was completed. Monitoring results are reported in this PCR. See monitoring results in Section 5 of this PCR report.

Section	Requirement	Status	Evidence / Comment
EP-04 Water Management			
Purpose: Addresses surface water management at the IWDF.			
5.1	<p>Project Planning in Relation to Seasonal Conditions The Operations Manager and FMC Project Manager shall liaise with Finance in relation to an appropriate time for field operations to take place at the IWDF, given weather (rainfall) data available for the site.</p> <p>Possible delays in field activities due to seasonal (and unseasonal) rainfall shall be considered when developing project schedules and budgets.</p>	N/A	No disposal occurred during the reporting period however a review of the project schedule and estimated budget confirmed that contingency had been included for possible delays due to unseasonal rainfall during non-disposal site inspection/monitoring events.
5.2	<p>Surface Topography Management and Drainage Design Surface topographic contour maps and aerial photographs for the site shall be referenced by the Operations Manager during positioning of future disposal trenches and the development of site drainage systems.</p> <p>Each disposal trench shall be constructed with an elevated clay dome, which acts to shed water away from the disposal location, in accordance with the construction specification for the trench.</p> <p>V-drains shall be constructed to divert surface water runoff away from trench areas.</p> <p>Each completed (capped) disposal trench shall be surrounded by a V-drain as outlined in the construction specification (CS) for the trench.</p> <p>V-drains shall be maintained (re-cut) as required to ensure adequate capacity, particularly during winter months and after periods of high rainfall.</p>	In compliance	No disposal operation occurred during the reporting period however each completed disposal is surrounded by a V-drain as outlined in the construction specification for the cell. Existing V-drains are inspected during each monitoring visit to the IWDF.

Section	Requirement	Status	Evidence / Comment
5.3	<p>Operation Weather Reporting and Surface Water Management</p> <p>During excavation and filling of disposal trenches, the Operations Manager shall assess weather conditions daily (or as otherwise required). This may include a request to Finance for weather reports from the Bureau of Meteorology, examination of the temporary weather station at the trench office, or online weather reports.</p> <p>During excavation and filling of disposal trenches, sand & gravel windrows shall be present around the perimeter of the trench, except for the ramp end of the trench.</p> <p>If heavy rainfall is expected, or possible, the Operations Manager shall ensure that temporary soil (ideally clay) berms are constructed at the top of the ramp, to prevent surface water runoff down the ramp into the trench. Temporary v-drains may also be constructed to aid local drainage.</p> <p>If waste is present within the disposal trench, sand & gravel shall be placed above the waste to a thickness of at least 250mm and shall be compacted as far as practicable. Clay berms may also be placed to surround the waste.</p> <p>Waste unloading and placement activities shall be suspended if heavy rain threatens or is falling, at the direction of the Operations Manager (or Earthworks Contractor Supervisor).</p>	N/A	No disposal operation occurred during the reporting period.
5.4	<p>Management of Accumulated Water in Trench</p> <p>If a significant amount of water collects in an open disposal trench (e.g., because of unforeseen rainfall), the water may be managed in one of the following ways:</p> <ul style="list-style-type: none"> • the water shall be allowed to dry out in situ; and / or • the water shall be soaked up by the introduction of sand and gravel or clay material into the trench, which would then be removed from the trench to a nearby area to dry. 	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>The dried material shall be placed back into the trench as part of the fill/capping material. The water shall be pumped out to a designated evaporation area (evaporation pond).</p> <p>If waste is present within the trench (even if it is buried beneath sand cover), or if contamination of the water with waste material is suspected, sampling and analysis of the pumped water may be undertaken for waste constituents.</p>		
EP-05 Rehabilitation Management			
Purpose: Addresses rehabilitation management at the IWDF.			
5.1	<p>Rehabilitation of Disposal Trench Surrounds</p> <p>The Operations Manager and Environment Manager shall ensure that vegetation and topsoil cleared from the site of a proposed disposal trench are stockpiled in a position close to the trench. Stockpiles shall be windrowed where possible.</p> <p>The maximum height of topsoil stockpiles shall be 2 m.</p> <p>On completion of a disposal trench (i.e., following completion of the water shedding clay dome) cleared areas surrounding the trench shall be rehabilitated by spreading the stockpiled vegetation and soil stockpiles evenly across the areas.</p> <p>The rehabilitated areas shall be tined/ripped to facilitate the infiltration of rainwater and aid revegetation, in accordance with Operation Construction Specifications (CS).</p>	N/A	No disposal operation occurred during the reporting period.
5.2	<p>Rehabilitation of Tracks</p> <p>Tracks used for access to the disposal compounds currently in use shall be kept clear of vegetation by vehicle use and re-grading where necessary.</p>	In compliance	Interview with the Operations Manager confirmed that tracks used to access disposal compounds have been kept clear of vegetation by vehicle use.

Section	Requirement	Status	Evidence / Comment
	<p>Tracks used for access to drill hole locations or other locations which are no longer used shall be allowed to revegetate naturally.</p> <p>Temporary tracks shall be constructed in a manner to preserve the topsoil and younger plants in situ to assist natural revegetation (i.e., avoiding grubbing or soil removal).</p>		<p>No re-grading was required during the audit period. Tracks to unused locations have been allowed to revegetate naturally. No new tracks constructed during this reporting period.</p>
5.3	<p>Rehabilitation of Oversize Silcrete Disposal Area</p> <p>The Operations Manager shall ensure that all oversize silcrete material generated during the excavation of silcrete for a disposal trench is removed to a dedicated oversize silcrete disposal area.</p> <p>The Operations Manager shall ensure that vegetation and soil cleared from the site of an oversize silcrete disposal pit are stockpiled in a position close to the pit.</p> <p>Stockpiles shall be windrowed where possible. The maximum height of topsoil stockpiles shall be 2 m.</p> <p>On completion of a disposal pit the silcrete shall be covered with the stockpiled sand and gravel to form a low mound (a maximum height of 1 m above ground level). The mound, as well as cleared areas adjacent to the pit shall be rehabilitated by spreading the stockpiled vegetation and soil stockpiles evenly across the areas.</p> <p>The rehabilitated areas shall be ripped to aid revegetation, in accordance with Operation Construction Specifications (CS).</p>	N/A	<p>No disposal operation occurred during the reporting period.</p>
5.4	<p>Rehabilitation of Borrow Pits</p> <p>Borrow pits are located at several locations along the access road to the IWDF.</p>	N/A	<p>No borrow pits have been decommissioned to date.</p>

Section	Requirement	Status	Evidence / Comment
	If borrow pits are likely to continue to be used during the operational period of the IWDF, their rehabilitation shall be addressed as part of the decommissioning rehabilitation plan (see below). Decommissioned/completed borrow pits shall be contoured, topsoil replaced and ripped to aid rehabilitation.		
5.5	Monitoring of Rehabilitation The Operations Manager and Environment Manager shall ensure that areas undergoing rehabilitation are monitored on a regular (yearly) basis, to determine progress and effectiveness of revegetation, in accordance with Environmental Instruction EI-04, Rehabilitation Monitoring.	In compliance	See Appendix L for records of Oct 2021 rehabilitation monitoring.
5.6	Seed Collection There are currently no plans to undertake local native seed collection or to use available regional seed stocks. However, if rehabilitation monitoring indicates that unassisted (unseeded) rehabilitation is not achieving targets (as defined in the IWDF Decommissioning and Rehabilitation Plan) a seed collection strategy will be put in place.	N/A	Not required as all revegetated areas have been achieving targets.
5.7	Post-Decommissioning Rehabilitation of the Site A decommissioning and rehabilitation plan shall be produced upon direction by Finance.	N/A	There are currently no plans to decommission the site.
EP-06 Air Quality and Dust Management			
Purpose: Addresses air quality and dust management at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
EP-07 Waste Management			
Purpose: Addresses the management of non-intractable waste at the IWDF.			

Section	Requirement	Status	Evidence / Comment
5.1	<p>Camp Waste</p> <p>The Operations Manager shall ensure that all food waste, litter, and other domestic waste materials are crushed, wherever possible, to reduce their volume prior to being placed in rubbish bags and stored in a rubbish trailer on site.</p> <p>The burying or burning of camp waste on site is not permitted.</p> <p>The waste shall be collected and transported off-site by Earthworks Contactor personnel and disposed of at the Southern Cross or Coolgardie municipal landfills.</p> <p>When contractor personnel are transporting the rubbish trailer, loads must be secured appropriately so that no waste leaves the vehicle during transit. Camp waste shall be transported off site as regularly as possible to minimise odour, flies, and maggots (ideally once per week, particularly during summer months).</p>	In compliance	Interview with Operations Manager and other monitoring personnel confirmed that all domestic waste was placed in rubbish bags and removed from site at the completion of monitoring events and other non-disposal site visits.
5.2	<p>Sewerage</p> <p>Septic tanks and leach drains have been installed for the existing accommodation and messing facilities. Temporary facilities (e.g., contractor kitchen and ablution blocks) shall be connected to the septic system by a qualified plumber at commencement of disposal operations.</p> <p>The status of the septic system should be checked by a qualified plumber every 5 years.</p>	In compliance	Status of septic system was checked April 2022 and was found to be satisfactory.
5.4	<p>Recycling</p> <p>Recycling facilities are not available in Coolgardie or Southern Cross but are available in Kalgoorlie. Hence, the generation of camp waste shall be minimised, where practicable, to reduce the amount of waste requiring disposal to landfill by: ordering in bulk, where practicable; compacting waste (such as cans, cartons, and boxes).</p>	N/A	Interview with the FMC Operations Manager confirmed that cans, cartons, and boxes were compacted before being removed from site for disposal.

Section	Requirement	Status	Evidence / Comment
EP-08 Fuel, Oil and Hazardous Materials Management			
Purpose: Addresses the management of fuels, oils, and other hazardous materials at the IWDF			
5.1	<p>Transport of Fuels The Earthworks Contractor shall ensure that the requirements of the Australian Dangerous Goods Code and the Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 are always followed.</p> <p>These requirements include the following:</p> <ul style="list-style-type: none"> • the vehicle shall be appropriately licensed; • any fuel drums must be secured against vertical and horizontal movement; • the vehicle must carry the appropriate type and size of fire extinguisher (e.g., 9 litre foam); • appropriate shipping documents must be carried; and • the vehicle must have the appropriate signage for the substances carried (i.e. Flammable Liquid Class 3). 	N/A	No fuel was delivered during reporting period.
5.2	<p>Storage of Fuels, Oils, and other Hazardous Materials Fuels and other hazardous materials shall be stored in accordance with the Dangerous Goods Safety (Storage and Handling of non-explosives) Regulations 2007 and AS 1940-2017 and amendments. Fuels shall be stored within the bunded fuel storage area at the site camp, in accordance with the Dangerous Goods Safety (Storage and Handling of non-explosives) Regulations 2007 and AS 1940 - 2017 and amendments.</p> <p>An inventory of dangerous goods stored at the site shall be maintained, using IWDF-Form-51 Dangerous Goods Storage Record. This record shall be updated upon delivery of fuels and oils and at the beginning and end of each disposal operation.</p>	In compliance	<p>The FMC Operations Manager verified that all fuels were stored in the appropriately bunded fuel storage area. The fuel storage area was upgraded during the 2020 disposal operation.</p> <p>See Appendix Y for Dangerous Goods Storage records.</p> <p>No drums of fuel were left on site during periods of ongoing management.</p>

Section	Requirement	Status	Evidence / Comment
	<p>Diesel shall be stored in the 2,000 litre above ground storage tank located within the bunded area.</p> <p>Other fuel, such as unleaded petrol (a maximum of 300L), and oils, shall be stored in drums within the bunded area. Drums shall always remain upright.</p> <p>Temporary storage of small volumes of diesel fuel or oil (e.g., up to 500L) shall be permitted at the trench location, for maintenance purposes, during excavation, waste disposal and capping activities if temporary bunding is put in place (e.g., a containment pallet).</p> <p>Safety precautions shall be implemented at the storage locations to minimise the risk of fire, including the following:</p> <ul style="list-style-type: none"> • Storage area shall be kept free of flammable vegetation. • Fire extinguishers shall be positioned in proximity. • Smoking shall not be permitted within 10 m of the storage area. <p>The Safety Manager shall ensure that Safety Data Sheets (SDSs) for all fuels, oils and other hazardous materials are available at site (site office).</p>		<p>The FMC Operations Manager verified that SDSs were available for all fuels, oils and hazardous materials thought to be on site.</p> <p>SDS information is now maintained in electronic format as well as hardcopy.</p> <p>Photographs confirmed that the fuel storage area was free of flammable vegetation and a current fire extinguisher was present.</p>
5.3	<p>Use of Fuels and Oils</p> <p>The use of fuel and oils shall be minimised wherever possible, whilst still allowing sufficient maintenance of equipment and machinery.</p> <p>Refuelling activities, vehicle and generator servicing and fuel storage shall be managed to minimise both the risk of spillages occurring and the damage to the environment should the spillage occur.</p>	In compliance	Interview with site personnel confirmed that refuelling tasks such as refuelling the generator were undertaken using spill trays. Review of incident records demonstrated that no reportable spills occurred.

Section	Requirement	Status	Evidence / Comment
	<p>Management controls shall include:</p> <ul style="list-style-type: none"> • Bunding storage areas (e.g., using spill trays/portable bunds). • Clean-up of spillages, including capture of further leaks/spills in drums or other approved storage containers. • Removal of soil affected by the spillage (see below). • Hydrocarbons shall be handled in accordance with safety instructions in the Safety Data Sheets (SDSs) available at site (site office). 		
5.4	<p>Emergency Spill Response Procedures for Emergency Spill Response are outlined in Emergency Response Procedure ERP-01 Incident Prevention, Reporting, and Investigation and ERI-02 Waste/Spill Incident Response Procedures.</p> <p>All spillages of fuels, oils or other hazardous materials shall be reported, as soon as practicable, to the Operations Manager.</p> <p>All spillages shall be cleaned up, as soon as practicable, under direction of the Operations Manager.</p> <p>Further leaks or spills shall be captured in drums or other approved storage containers until the cause of the leak can be rectified.</p> <p>Fuels, oils, and other hazardous materials shall be handled in accordance with safety instructions in the Materials Safety Data Sheets (MSDSs) available at site (site office).</p>	In compliance	<p>Review of incident reporting confirmed no spills were reported during the reporting period. As the IWDF is unmanned during non-disposal periods spill kits are stored in the sea container at the IWDF.</p> <p>FMC Operations Manager confirmed that a hardcopy SDS file is in the site office. SDS are also available in the FMC project folder.</p>
5.5	<p>Disposal of Contaminated Soil Contaminated soil shall be managed in one of the following ways:</p> <ul style="list-style-type: none"> • Contaminated soil shall be placed in the trench as part of the waste fill or backfill. 	N/A	No reportable spills occurred during this reporting period.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> Hydrocarbon-contaminated soil shall be spread thinly over a cleared area to allow for natural remediation, prior to stockpiling and placement in the trench. 		
5.6	<p>Storage and Disposal of Waste Fuels and Oils At the camp site or the trench location, drums or containers labelled “Waste Oil” shall be used for the disposal/storage of any waste oils which have been generated during the servicing of equipment, vehicles, and camp generators.</p> <p>Funnels shall be used to prevent any spillage while transferring waste oil into the drums.</p> <p>Drums shall be kept closed when not being filled. Oil filters shall also be emptied into the waste oil drums.</p> <p>When nearly full, the drums shall be disposed at an approved waste oil disposal site (e.g., in Kalgoorlie) by Earthwork’s contractor personnel.</p>	N/A	As no waste disposal operation occurred during the reporting period no waste oil drums were stored at the IWDF.
5.7	<p>Disposal of Empty Drums/Containers All emptied fuel and oil drums shall be taken off site to be re-filled, re-used, or delivered to an authorised landfill for disposal.</p>	N/A	As no waste disposal operation occurred during the reporting period no waste oil drums were stored at the IWDF.
EI-01 Groundwater Monitoring			
Purpose: Must be followed for the ongoing monitoring of groundwater at the IWDF site. Monitoring for the presence of groundwater and of groundwater quality (should groundwater be found) is required to assess the potential impact of buried waste on groundwater.			
5.1	<p>Nomenclature and Recording Monitoring locations are to be recorded using standard nomenclature, such as 2008-GM1-01. Where:</p> <ul style="list-style-type: none"> The first set of numbers relates to the year 	In compliance	See Figure 4 of this PCR for appropriately named monitoring locations and Appendix U for groundwater monitoring records.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • The second set of numbers refers to the monitoring location which should be referenced on a map or diagram • The last two numbers identify the sample number at that location. • Each monitoring event is to be recorded using the Sampling/Monitoring Record Form (IWDF-Form-03). 		
5.2	<p>Monitoring Locations The monitoring bore locations are recorded on a Monitoring Location Figure, which shall be updated as new locations are added.</p>	In Compliance	See Figure 4 of this PCR.
5.3	<p>Monitoring Schedule Finance shall coordinate all groundwater monitoring through yearly monitoring schedules. The FMC will undertake the monitoring.</p> <p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules.</p> <p>Groundwater monitoring shall be undertaken every 6 months (if no groundwater is encountered) or every 3 months (if groundwater is encountered). Successive monitoring events are to be recorded on a Monitoring Register IWDF-Form-39.</p>	In compliance	<p>Monitoring events have been recorded on a Monitoring Register IWDF-Form-39.</p> <p>See Appendix U for groundwater monitoring records.</p>
5.4	<p>Maintenance and Calibration of Monitoring Equipment The Operations Manager shall ensure that the monitoring equipment (i.e., the groundwater monitoring probe) used at the site undergoes regular maintenance and calibration in accordance with FMC Management Procedure FMP-06 Control and Maintenance of Equipment.</p>	In compliance	Monitoring personnel confirmed that groundwater monitoring equipment was tested by dipping in water and checking for signal prior to each monitoring round.

Section	Requirement	Status	Evidence / Comment
	<p>The groundwater monitoring probe shall be located at the FMC offices in Perth (during periods when no site activities are underway) or in the site office or store (during disposal activities).</p> <p>Site personnel undertaking groundwater monitoring (Environment Manager) shall ensure that the groundwater monitoring probe is calibrated prior to each monitoring event by dipping the probe in water and checking for the signal. The results of the calibration test shall be recorded on the Sampling/Monitoring Record Form (IWDF-Form-03).</p>		
5.5	<p>Monitoring Method</p> <p>At each prescribed monitoring location, the following shall be undertaken:</p> <ul style="list-style-type: none"> • The bore shall be dipped to determine if water is present. • Results shall be recorded on the Sampling/Monitoring Record Form (IWDF-Form-03). • If water is present: <ul style="list-style-type: none"> • The water level shall be measured and reported on the Sampling/Monitoring Record Form (IWDF-Form-03). • A water sample shall be taken (see below). • The bore shall be purged prior to sampling (using a bailer or pump) comprising the removal of a minimum of three bore volumes. <p>A water sample shall be taken using a disposable bailer or a bailer which has been decontaminated (using detergent and water) prior to use and then rinsed in fresh (ideally distilled) water. If a non-disposable bailer is used, equipment blank shall be taken (by sampling the distilled water passed through the cleaned bailer).</p> <p>The water sample(s) shall be placed in sample bottles appropriate for the proposed analyses (see below). At least one duplicate sample shall be taken and analysed.</p>	In Compliance	Bores were dipped but water was not present. Results were recorded on appropriate form. See Appendix U for groundwater monitoring records.

Section	Requirement	Status	Evidence / Comment
5.6	<p>Health and Safety</p> <p>The appropriate PPE shall be worn while collecting any sample, dependent on the type of sample, type of potential contaminant, potential exposure pathways and location.</p> <p>The Safety Manager will indicate the appropriate PPE required, as referred to in the Operation Health & Safety Procedures (if relevant).</p> <p>Any PPE that comes into contact, or is suspected to have come into contact, with contaminated samples, must be thrown away or decontaminated by washing with soapy water and rinsing in fresh water.</p>	N/A	No disposal operation occurred during reporting period however Interview confirmed that appropriate PPE is always worn during monitoring activities at the IWDF.
5.7	<p>Sample Storage and Transport</p> <p>Samples should be stored appropriately, dependent on their type and proposed analysis. Water samples should be stored in a chilled esky and packaged for transport. Transport to the receiving laboratory should be arranged as soon as possible.</p>	N/A	No water was detected therefore no samples to be stored or transported. See Appendix U for groundwater monitoring records.
5.8	<p>Sample Analysis and Chain of Custody</p> <p>All samples shall be analysed by a laboratory that is NATA certified for the analyses required.</p> <p>A Chain of Custody Record (IWDF-Form-01), signed by the Environment Manager, will accompany the samples from the IWDF to the laboratory (probably in Perth) to be signed on receipt by laboratory personnel.</p> <p>Analysis must be undertaken within permitted holding times for the parameter being analysed (liaise with the laboratory to ensure these holding times are known).</p>	N/A	No samples collected. See Appendix U for groundwater monitoring records

Section	Requirement	Status	Evidence / Comment
5.9	<p>Water Sample Analysis</p> <p>The water samples shall be analysed for the component(s) specific to all wastes currently buried at the site, as summarised in IWDF-Form-21 Groundwater Analysis Register, which is held by the FMC Environment Manager.</p> <p>The water analyses shall be interpreted using the relevant values from the DWER Contaminated Site Assessment Criteria or as otherwise determined by the Environment Manager or Radiation Safety Officer, or in the Operation Environmental Procedures.</p> <p>If any components are detected above recognised background (or previous monitoring) concentrations, Finance shall be notified, and appropriate remedial action taken, as directed by the Environment Manager.</p>	N/A	No groundwater water was detected therefore no analysis required. See Appendix U for groundwater monitoring records
EI-02 Soil and Dust Environmental Sampling			
Purpose: Addresses the methods for sampling and analysis of soil and dust during disposal operations at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
EI-03 Capping Monitoring			
Purpose: Must be followed for the ongoing monitoring of capping at the IWDF.			
5.1	<p>Nomenclature and Recording</p> <p>Monitoring locations are to be recorded using standard nomenclature, such as 2008RT01-L01-01 Where:</p> <ul style="list-style-type: none"> • The first set of numbers relate to the trench number or the activity. • The second set of numbers refers to the monitoring location which should be referenced on a map or diagram. • The last two numbers identify the photo or record number at that location. 	In compliance	See Appendix M for Capping Monitoring records.

Section	Requirement	Status	Evidence / Comment
	Monitoring records are to be recorded using the Capping Monitoring Record Form (IWDF-Form-38b).		
5.2	<p>Monitoring Locations For every waste disposal trench, at least one location shall be identified around the trench. The precise location will depend on the size and nature of the capping.</p> <p>The locations will be selected and marked so that the same locations can be used for repeated monitoring.</p> <p>The locations shall be recorded on a Monitoring Location Figure, which shall be updated as new locations are added.</p>	In compliance	See monitoring locations in Figure 4 of this PCR.
5.3	<p>Monitoring Schedule Monitoring shall be undertaken approximately once per year, or as otherwise directed by Finance, in accordance with Finance monitoring schedule(s). The FMC will undertake the monitoring.</p> <p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules. Successive monitoring events are to be recorded on a Monitoring Register (IWDF-Form-39).</p>	In compliance	See Appendix M for Capping Monitoring records.
5.3.1	<p>Monitoring Method At each prescribed monitoring location, the following shall be undertaken:</p> <ul style="list-style-type: none"> Photographs – to be taken from the same location, in the same direction, and of the same feature. 	In compliance	See Appendix M for Capping Monitoring records.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • Written notes – visual observations of the integrity of the trench dome surface, to include the presence of: • Erosion channels • Subsidence. • Measurements – depths of channel erosion or subsidence features, if feasible. <p>The exact location of measurements should be recorded in photographs or sketches to allow comparison with subsequent measurements.</p>		
5.3.2	<p>Monitoring Analysis and Actions</p> <p>Monitoring results and observations shall be compared with previous results to identify potential changes in the integrity of the capping.</p> <p>If erosion or subsidence of the capping is identified, the Operations Manager (having discussed the issue with the Engineering Manager) shall undertake repair works on the cap, as soon as practicable.</p>	In compliance	<p>Review of capping monitoring results demonstrated that some minor erosion has been detected but does not yet require repair work.</p> <p>See Appendix M for Capping Monitoring records.</p>
EI-04 Rehabilitation Monitoring			
Purpose: Must be followed for the ongoing monitoring of rehabilitation at the IWDF.			
5.1	<p>Nomenclature and Recording</p> <p>Monitoring locations are to be recorded using standard nomenclature, such as 2008RT01-L01-01. Where:</p> <ul style="list-style-type: none"> • The first set of numbers relate to the trench number or the activity. • The second set of numbers refers to the monitoring location which should be referenced on a map or diagram. • The last two numbers identify the photo or record number at that location. 	In compliance	See Appendix L for rehabilitation monitoring records.

Section	Requirement	Status	Evidence / Comment
	Monitoring records are to be recorded using the Rehabilitation Monitoring Record Form (IWDF-Form-38a).		
5.2	<p>Monitoring Locations For every waste disposal trench, approximately 2 locations shall be identified around the trench, one on each side of the trench.</p> <p>The precise location will depend on the size and nature of the trench and the extent of rehabilitated area.</p> <p>The locations will be selected so that the same locations can be used for repeated monitoring. The locations shall be recorded on a Monitoring Location Figure, which shall be updated as new locations are added.</p>	In compliance	See monitoring locations in Figure 4 of this PCR.
5.3	<p>Monitoring Schedule Monitoring shall be undertaken annually, ideally during spring months, in accordance with Finance monitoring schedule(s). The FMC will undertake the monitoring.</p> <p>The FMC Project Manager and Environment Manager shall ensure that monitoring undertaken by the FMC is undertaken in accordance with the Finance schedules. Successive monitoring events are to be recorded by Finance on a Monitoring Register (IWDF-Form-39).</p> <p>A botanist shall inspect the rehabilitation at least every 10 years.</p>	In compliance	See Appendix L for rehabilitation monitoring records.
5.3.1	<p>Monitoring Method At each prescribed monitoring location, the following shall be undertaken:</p>	In compliance	See Appendix L for rehabilitation monitoring records.

Section	Requirement	Status	Evidence / Comment
	<ul style="list-style-type: none"> • Photographs – to be taken from the same location, in the same direction, and of the same feature. • Written notes – visual observations of the extent of revegetation, such as: <ul style="list-style-type: none"> • Density of vegetation (% ground coverage). • Maximum height of vegetation. • Average height of vegetation. • Species diversity. • Presence of weeds. <p>The existing, fenced, disposal compounds shall remain clear of vegetation for the operational life of the site, to allow for monitoring of the integrity of the water shedding clay dome.</p> <p>Any vegetation found to be growing on the water shedding clay dome shall be removed.</p>		
5.3.2	<p>Monitoring Analysis and Actions</p> <p>Monitoring results and observations shall be compared with previous results to track the development of revegetation. Care should be taken to compare monitoring results with those of similar seasons (or consider seasonal changes).</p> <p>If revegetation does not appear to be progressing, the following may be undertaken:</p> <ul style="list-style-type: none"> • Inspection of the rehabilitated areas by a botanist to identify potential issues and management strategies. • A management strategy shall be implemented, such as reseeded. 	In compliance	Rehabilitation monitoring results 2014 to 2021 have been reviewed and it was concluded that the rehabilitation is progressing well.

FMC Radiation Management Procedures

Section	Requirement	Status	Evidence / Comment
RP-01 Radiation Management			
Purpose: addresses the management of radioactive waste disposal at the IWDF.			
Not required as no radioactive disposal operation occurred during the reporting period.			
RI-01 Gamma Radiation Monitoring			
Purpose: Must be followed for the measurement of gamma radiation levels at the IWDF.			
5.1	<p>Monitoring Equipment & Calibration</p> <p>Gamma radiation levels are to be measured using an appropriately calibrated Environmental Monitor, equipped with a Geiger-Muller scintillator probe, which enables the aggregate count in one minute to be recorded.</p> <p>The RSO shall ensure that appropriate calibration records are obtained in accordance with FMC Management Procedure FMP-06 Control and Maintenance of Equipment.</p> <p>A copy of the current calibration certificate or letter of authorisation is to be included with all reports.</p>	N/A	Gamma radiation monitoring is due Oct 2022
5.2	<p>Monitoring Method</p> <p>The detector is to be fixed horizontally one metre above the ground level at each location point, 3 (three) one-minute counts are taken, and the aggregate counts recorded.</p>	N/A	
5.3	<p>Pre-Disposal Monitoring</p> <p>A one-off gamma radiation survey is to be conducted prior to the commencement of any earthworks associated with a disposal operation.</p>	N/A	No disposal of radioactive waste occurred during audit period.

Section	Requirement	Status	Evidence / Comment
	<p>Measurements are to be made on a grid over the proposed disposal area. The size of the grid should be such that a minimum of 25 location points is measured within the area.</p> <p>The location of each point measured is to be established by GPS, or equivalent.</p> <p>All the data are to be recorded within a table, or equivalent, showing both the locations and the aggregate counts.</p> <p>The mean aggregate counts in one minute are to be converted to micrograys per hour using the approved calibration factor for the radiation monitor.</p> <p>The report should specify the number of measurements, the range of gamma radiation levels (or more strictly the absorbed dose rates in air expressed as micrograys per hour), and the mean and standard deviation from the mean.</p>		
5.4	<p>Post-Disposal Monitoring</p> <p>A one-off gamma radiation survey is to be conducted after the completion of all earthworks associated with a radioactive waste disposal operation.</p> <p>Measurements are to be made at a representative number of location points within, and at the perimeter of, the disposal compound. The location of each point measured is to be established by GPS, or equivalent.</p> <p>Results shall be recorded on the Gamma Radiation Monitoring Form. The mean of 3 (three) one-minute counts are to be recorded at each location.</p> <p>All the data are to be shown in a table, or equivalent, showing both the locations and the mean aggregate counts.</p> <p>The mean aggregate counts in one minute are to be converted to micrograys per hour using the approved calibration factor for the radiation monitor.</p>	N/A	No disposal of radioactive waste occurred during audit period.

Section	Requirement	Status	Evidence / Comment
	<p>The report should specify the number of measurements, the range of gamma radiation levels (or more strictly the absorbed dose rates in air expressed as micrograys per hour), and the mean and standard deviation from the mean.</p>		
5.5	<p>On-going Monitoring Gamma radiation surveys are to be conducted every five years, or associated with a burial operation involving radioactive waste, whichever is the shortest interval.</p> <p>Measurements are to be made at a representative number of location points within, and at the perimeter of, the disposal compound.</p> <p>The location of each point measured is to be established by GPS, or equivalent.</p> <p>Results shall be recorded on the Gamma Radiation Monitoring Form. The means of 3 (three) one-minute counts are to be recorded at each location.</p> <p>All the data are to be shown in a table, or equivalent, showing both the locations and the mean aggregate counts.</p> <p>The mean aggregate counts in one minute are to be converted to micrograys per hour using the approved calibration factor for the radiation monitor.</p> <p>The report should specify the number of measurements, the range of gamma radiation levels (or more strictly the absorbed dose rates in air expressed as micrograys per hour), and the mean and standard deviation from the mean.</p>	N/A	Gamma radiation monitoring is due in October 2022.

Section	Requirement	Status	Evidence / Comment
6.	The RSO shall ensure that all monitoring records are filed in the IWDF Radiation Monitoring File maintained in his office as per FMC Management Procedure FMP-02 Record Management.	In compliance	Review confirmed that all past radiation monitoring reports are included in the radiation monitoring folder of the IWDF Document Library.
7.	<p>The RSO shall submit reports on the various monitoring programs to the FMC Project Manager and Finance Project Manager.</p> <p>Finance shall forward a copy of each radiation monitoring report to the RCWA.</p>	N/A	The only monitoring undertaken during the reporting period was the public dose constraint monitoring. See Section 5.4 of this PCR for results. This PCR will be provided to RCWA.
RI-02 Occupational Radiation Monitoring			
Purpose: Must be followed for the personal radiation monitoring of personnel involved with disposal operations at the IWDF involving radioactive items. Personal radiation monitoring is applicable to the acceptance, packaging, transportation, and burial phases of an operation.			
As no radioactive disposal operation occurred during the reporting period only section 5.4 of RI-02 was audited.			
5.4	<p>Public Radiation Monitoring (dose constraint)</p> <p>Public dose exposures under normal operations (care and maintenance) need to be measured to demonstrate that the public dose constraint is achievable.</p> <p>Each time the FMC visit the IWDF a thermoluminescent dosimeter (TLD) badge will be assigned to a person involved in the site activities. The TLD badge should be worn at the waist height. The TLD badge shall be worn prior to the beginning of the site activities and for the duration of the site activities. A TLD badge will also be assigned as a control at a location that will not be impacted upon by any radioactive material.</p> <p>TLD badges should be provided from an approved radiation monitoring service provider.</p>	In compliance	See discussion at Section 5.4 of this PCR. Completed Form – PRM6 was sighted.

Section	Requirement	Status	Evidence / Comment
	<p>All TLD badges and the control TLD badge should be returned to the RSO as soon as practicable. The RSO will be responsible for sending the TLD badges to the monitoring service provider.</p> <p>On return of badges from monitoring service provider, record TLD dose of each person on the Personal (Worker) Radiation Monitoring Form – PRM5, and Personal (Public) Radiation Monitoring Form – PRM6, including issue date, worker name, date of birth, work activity, and work duration.</p> <p>Where the indicated dose is close to or exceeding the IWDF dose constraint, as discussed in Section 5.3, the RSO must investigate the cause of the dose constraint breach and, if appropriate, put in place further dose control measures to minimise worker exposures.</p>		

FMC Safety Management Procedures

Section	Requirement	Status	Evidence / Comment
SP-01 Health and Safety Management and Planning			
Purpose: addresses the management and planning of health & safety during disposal operations at the IWDF.			
5.1	<p>Identification of Hazards (Aspects and Impacts)</p> <p>An Environmental and Health and Safety Aspects and Impacts Register shall be maintained and updated for general and waste-specific activities at the IWDF.</p> <p>This may comprise part of the general IWDF Aspects and Impacts Register.</p> <p>The register shall be developed using a risk assessment method developed for the IWDF,</p>	In compliance	Aspects and Impacts Register was reviewed Dec 2021 and May 2022 by FMC Project Manager.

Section	Requirement	Status	Evidence / Comment
	<p>as outlined in Finance Management Procedure MP-01 Aspects and Impacts.</p> <p>The register shall be updated prior to each new disposal operation, to include waste-specific aspects and impacts.</p> <p>The register shall be updated to include additional activities that may be planned as part of the ongoing management of the site.</p>		
5.2	<p>Operational Health & Safety Documentation</p> <p>The Health & Safety Aspects and Impacts Register shall be used to identify (and if necessary, update), health and safety management procedures, as outlined in the IWDF Safety Procedures (SPs) and associated Safety Instructions (SIs).</p> <p>A document summarising the Operation Health & Safety and Emergency Response Procedures (OHS&ERP) for the proposed disposal project shall be compiled by the FMC Systems Manager with input from the Health & Safety Manager and the RSO (if necessary).</p> <p>The scope of the OHS&ERP shall be in accordance with the Health & Safety and Emergency Response (Reporting) Guidelines.</p>	N/A	<p>Aspects and Impacts Register was reviewed Dec 2021 and May 2022 by FMC Project Manager.</p> <p>No disposal operation occurred during the reporting period.</p>
5.3	<p>Operational Health & Safety Planning</p> <p>The following health and safety planning activities shall be completed prior to commencement of site operation activities:</p> <ul style="list-style-type: none"> • Selection and purchase of applicable PPE (see Safety Instruction SI-02 Personal Protective Equipment). • Engagement of a site nurse/paramedic or senior first aid officer (see Safety Instruction 	N/A	<p>No disposal operation occurred during the reporting period.</p>

Section	Requirement	Status	Evidence / Comment
	<p>SI-06 First Aid).</p> <p>The following health and safety planning activities shall be completed prior to commencement of any waste handling activities:</p> <ul style="list-style-type: none"> • Development and approval of operation specific health & safety and emergency response procedures (see above). • Appointment of and liaison with medical practitioner (in accordance with WorkSafe requirements) regarding health surveillance and medical clearance for respirator use (see Safety Instruction SI-04 Occupational Monitoring). • Liaison with Radiation Safety Officer (if necessary) to determine radiation safety requirements (see Radiation Procedure RP-01 Radiation Management). • Selection and purchase of applicable PPE (see Safety Instruction SI-02 Personal Protective Equipment). 		
SP-02 Operation Site Safety Management			
Purpose: Addresses safety management at the IWDF site during disposal operations.			
Not required as no disposal operation occurred during the reporting period.			
SI-01 Excavation Safety			
Purpose: Addresses the management of excavation safety at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-02 Personal Protective Equipment			
Purpose: Addresses the requirements for personal protective equipment at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-03 Hygiene and Decontamination			
Purpose: Addresses the requirements for decontamination at the IWDF.			

Section	Requirement	Status	Evidence / Comment
Not required as no disposal operation occurred during the reporting period.			
SI-04 Occupational Monitoring			
Purpose: Addresses the requirements for occupational monitoring and medical surveillance at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-05 Communications and Traffic Control			
Purpose: Addresses the requirements for communications and traffic control at the IWDF.			
5.1	<p>General Communications</p> <p>The IWDF 4WD vehicle is equipped with a portable satellite telephone and CB/UHF radio. Other communication on-site is by CB/UHF and portable radio.</p> <p>The portable radios must be capable of operating between the trench areas and the site accommodation area.</p> <p>Wherever possible, more than one person will be present at the site at any one time, and more than one person will undertake any isolated activity at the site.</p> <p>However, if an employee is isolated from other persons for a particular task, communication will be available in the form of a portable satellite telephone, CB/UHF radio or portable radio to enable the employee to call for help in the event of an emergency.</p> <p>Regular contact will be made between an isolated employee and either the Operations Manager or Safety Manager. An appropriate procedure (such as regular radio communication) will be established on a case-by-case basis by the Operations Manager or the Safety Manager and isolated worker, considering the proposed activity, proximity</p>	In compliance	<p>The FMC Operations Manager confirmed that:</p> <ul style="list-style-type: none"> • Portable satellite telephones and CB/UHF radios were in use. • The list of emergency contacts was displayed in the office and available in the site vehicles. <p>Review of Site Visit Records confirmed that there was always more than one person at the IWDF during monitoring events. See Appendix X for Site Visit Records.</p>

Section	Requirement	Status	Evidence / Comment
	<p>of the worker to the site and availability of communication systems.</p> <p>Site operations personnel will be in contact using portable radios. All persons expected to use the portable satellite telephone, CB/UHF radio and the portable radios will be trained in their use by the Operations Manager or Safety Manager.</p> <p>The list of Operation Emergency Contact numbers will be displayed next to the satellite phone in the office and the portable satellite telephone in the IWDF 4WD vehicle.</p> <p>The IWDF 4WD vehicle, with the satellite phone and CB/UHF radio, must be present on the site during general activities and at the operating trench during all waste disposal activities to enable emergency contacts to be alerted.</p>		
5.2	<p>Communication Protocol – Arrival/Departure</p> <p>All personnel (including visitors and contractors) are required to call the IWDF before departing the Great Eastern Highway turnoff to the site to advise on the anticipated time of arrival.</p> <p>Upon arrival, all persons must sign in the State Personnel and Visitor Logbook. Upon Departure, all persons must sign out in the State Personnel and Visitor Logbook.</p> <p>Similarly, personnel leaving the site are required to call the site when they have either left the access road at the southern end or arrived at their destination. This is to safeguard against personnel being stranded on the ill-frequented access road following an accident or breakdown.</p> <p>The Operations Manager or the Safety Manager will instigate a search if personnel fail to</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	arrive, or call from their destination, within one hour of the anticipated time.		
5.4	<p>Access Road – Waste Trucks Personnel involved in the dispatch of trucks from the waste producer’s storage location shall advise the Operations Manager at the site of the approximate arrival time of each convoy.</p> <p>Notify other road users (permit/agreement) approx. 30 days in advance that waste will be transported on the road – providing approximate dates and length of time.</p> <p>The Operations Manager will then inform local mining operations (if they are operational) of the anticipated arrival time of the trucks at the southern end of the site access road.</p> <p>At or before this anticipated time, the Operations Manager will place a sign at the Mt Dimer turn-off, which will read, “Beware Trucks on Road” or “Caution Convoy”.</p> <p>Once the trucks have arrived at the southern end of the access road, the driver of the last truck will place a sign that reads, “Beware Trucks on Road”. Alternatively, the Operations Manager, or delegate, will place these signs prior to arrival of the trucks. These signs shall remain until the operation is completed.</p> <p>Truck drivers will be informed not to use the road in wet conditions. A large truck bay has been constructed at the southern end of the access road to allow up to five trucks to safely wait off the road, until weather and road conditions improve.</p> <p>Trucks carrying waste shall only travel on the access road during daylight hours (or as directed by the Operations Manager).</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
5.5	<p>Speed Limits for Access Road and Exclusion Zone</p> <p>A maximum speed limit of 40 km/h is set for the exclusion zone for all vehicles including heavy machinery.</p> <p>A maximum speed limit of 80 km/h is set for all other areas. Normal caution is appropriate at the site, especially near turn-offs and around buildings (where there are pedestrians).</p> <p>The speed limit for the site access road is 80 km/h, although road and weather conditions should be considered in establishing a safe speed, which may be specified by the Operations Manager.</p>	General information	
5.6	<p>Side-tracks</p> <p>There are numerous narrow tracks in a network around the site that are not maintained. Driving on these tracks, while not prohibited, is discouraged. It is easy to get lost in the network and not being maintained, the tracks often contain stakes, which could puncture tyres.</p> <p>There is generally no requirement to use these tracks to operate at the site and use of these tracks should only be following specific permission of the Operations Manager.</p>	General information	No disposal operation occurred during reporting period.
5.7	<p>Excavation Traffic Control</p> <p>Specific traffic control procedures may be required in the vicinity of the trench excavation area, which must be developed and communicated on an operation-specific basis.</p> <p>It is likely that visibility around the trench area may be impaired due to the presence of stockpiles of material. In such cases, a communication protocol shall be developed, for</p>	N/A	No disposal operation occurred during reporting period.

Section	Requirement	Status	Evidence / Comment
	example using radio contact to announce the entry of every vehicle into the trench area. Visitors shall not be allowed to drive in the trench area, without the specific permission of the Operations Manager.		
SI-06 First Aid			
Purpose: Addresses the requirements for first aid management at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-07 Heavy Machinery Operations			
Purpose: Addresses the requirements for heavy machinery operations at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			
SI-08 Exclusion Zones			
Purpose: Addresses the requirements for Exclusion Zones at the IWDF.			
Not required as no disposal operation occurred during the reporting period.			

FMC Operation Emergency Response Procedures

Section	Requirement	Status	Evidence / Comment
ERP-01 Incident Prevention Reporting and Investigation			
Purpose: Addresses the management of incidents at the IWDF.			
5.2	Avoidance of Incidents All site personnel shall endeavour to avoid the occurrence of incidents by: <ul style="list-style-type: none"> identifying, reporting, investigating, and recording all hazards and near misses; and following relevant operational, environmental and safety procedures (OPs, EPs, SPs, 		General information.

Section	Requirement	Status	Evidence / Comment
	ERPs).		
5.3	<p>Emergency Response Emergency Response Procedures shall be implemented for major incidents in accordance with Emergency Response Procedure ERP-02 Emergency Response Management.</p>	N/A	No major incidents occurred at the IWDF during the reporting period.
5.4	<p>Reporting & Notification of Near Misses, Accidents, and Incidents All near misses, accidents and incidents shall be reported by the identifier immediately (or as soon as practicable) to the Operations Manager or Safety Manager.</p> <p>All near misses, incidents or accidents shall be reported using a Near Miss/Accident/Incident Report (IWDF-Form-06) which shall be completed and registered (IWDF Form-07).</p> <p>Copies of all major incident/accident reports shall be forwarded to the FMC and Finance Project Managers within 24 hours (and as soon as practicable for major incidents). Appropriate authorities shall be notified in the event of major incidents (see specific ERI's).</p> <p>The Operations Manager shall contact relatives of any injured personnel, as required (using contact details given in the Medical Advice Form completed for the individual, if completed).</p> <p>The Operations Manager or any other FMC personnel shall not speak to the media regarding the incident, without the express permission of the Finance Project Director.</p>	N/A	<p>No near misses, accidents or incidents occurred during the reporting period.</p> <p>It should be noted that personnel were only present at the IWDF for several days during the reporting period.</p>
5.5	<p>Investigation All near misses and incidents shall be investigated by the Operations Manager and Safety</p>	N/A	No major incidents occurred during the reporting period.

	<p>Manager, as a minimum.</p> <p>Environmental incidents shall also be investigated by the Environment Manager (EP-09).</p> <p>The objectives of the investigation will be to:</p> <ul style="list-style-type: none"> • determine the existence of unforeseen hazards or contributing factors; • make recommendations for managing such hazards; • determine if any unsafe practice or condition was involved; • evaluate the adequacy of the existing safety management practices; • evaluate the effectiveness of the response implemented during the emergency; and • make recommendations for managing or eliminating unsafe conditions and for changes to procedures if warranted. <p>Major incidents shall be investigated by the FMC Project Manager, Operations Manager, Safety Manager, Environment Manager, if required, and waste owner health & safety personnel, as appropriate – the Investigation Team.</p> <p>The investigation procedure for a major incident shall be as follows:</p> <ol style="list-style-type: none"> 1. Those members of the Investigation Team present on site at the time of the incident or just after (e.g., the Operations Manager, Safety Manager) will seek to obtain facts about the incident quickly and accurately (but without detriment to the emergency response procedure); 2. The Operations Manager / Safety Manager will assess the hazards to others at the scene and, as appropriate, evacuate the area and/or seek professional assistance (e.g., fire brigade) to secure the premises and prevent further such occurrences; 3. Those members of the Investigation Team who are not at the site at the time of the incident, but are required on site, will arrive at the scene as soon as possible and will be briefed by those members of the team already present; 		
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Section	Requirement	Status	Evidence / Comment
	<p>4. Evidence at the scene of the incident will be preserved, except to the extent necessary to protect personnel and the environment, until the investigation is completed;</p> <p>5. Statements will be recorded from all witnesses;</p> <p>6. The injured person(s) will be interviewed as soon as possible;</p> <p>7. Physical evidence of the incident will be taken in the form of photographs and measurements of the scene;</p> <p>8. All other evidence relating to the incident will be recorded;</p> <p>9. Recommendations will be made for:</p> <ol style="list-style-type: none"> 1. the management and / or elimination of hazards / impacts relating to the incident; 2. changes in standard operating procedures; and 3. revision of training. <p>An accident investigation report will be compiled by the Safety Manager and will be submitted to Finance within 7 days of the emergency, or as agreed with Finance.</p> <p>The FMC Safety Manager shall also supply copies of the report to:</p> <ul style="list-style-type: none"> • any personnel directly involved/injured in the incident; and • FMC Project Manager and Operations Manager. <p>The Finance IWDF Project Manager shall provide a copy to WorkSafe Western Australia if notifiable injuries had been incurred (Occupational Safety and Health Regulations 1996, Section 2.4).</p>		

Section	Requirement	Status	Evidence / Comment
ERP-02 Emergency Response Management			
Purpose: Addresses the management of emergency response at the IWDF.			
5.3	<p>IWDF 4WD Vehicle and Emergency Stretcher</p> <p>The IWDF 4 Wheel Drive (4WD) vehicle shall be equipped with satellite phone and UHF radio, first aid kit, emergency contact details and procedures and shall be capable of transporting the stretcher.</p> <p>This vehicle shall be maintained and kept on-site during all operations and in the vicinity of the active trench during all disposal operations.</p> <p>The stretcher will be stored in the trench office during all operations and in the storage shipping container at other times.</p> <p>In the event of absence or failure of the IWDF 4WD vehicle, an alternative vehicle will be used, equipped with at least a portable satellite phone, portable radio (preferably a UHF radio), first aid kit and emergency contact details. Preference should be given for a long-wheel base vehicle capable of transporting a stretcher if necessary.</p> <p>Communications must be maintained with the site office such that the alarm can be raised, and emergency services contacted from the site satellite phone. The limitations of the vehicle should be considered in relation to emergency procedures requiring evacuation of injured victims.</p> <p>The First Aid Officer will assess whether a victim may be transported in a vehicle for evacuation.</p>	In compliance	Observation confirmed that the IWDF 4WD vehicle was equipped with satellite phone and UHF radio, first aid kit, emergency contact details and procedures and can carry a stretcher.

Section	Requirement	Status	Evidence / Comment
5.4	<p>Emergency Contact Details General (ongoing) Emergency Contact Details for the IWDF are provided in IWDF Emergency Contact Numbers document.</p> <p>Operation-specific contact details are compiled as part of the Operation Transport Procedures (OTP).</p> <p>The Department of Fire and Emergency Services (DFES) is designated as the Hazard Management Agency for hazardous materials emergencies in Western Australia. The DFES will be the first point of contact in the event of an emergency (e.g., fire) involving waste at the IWDF.</p> <p>The DFES is responsible for ensuring that all emergency management activities pertaining to the prevention of, preparedness for, response to and recovery from hazardous materials emergencies are undertaken.</p> <p>The HAZMAT Coordinating Committee comprises many agencies, both government and private (e.g., DFES, Police, DWER, and Ambulance services) and assists the DFES to coordinate the State's resources in the management of hazardous materials emergencies.</p>	General information	
5.5	<p>Emergency Response Team An IWDF Emergency Response Team (ERT) shall respond to all incidents or emergencies at the IWDF site.</p> <p>The ERT shall comprise the Operations Manager, Safety Manager, First Aid Officer, Environment Manager, and the Contractor Supervisor, under the management of the</p>	N/A	No disposal operation occurred during the reporting period.

Section	Requirement	Status	Evidence / Comment
	<p>Operations Manager (or the Safety Manager if the Operations Manager is unavailable).</p> <p>The Operations Manager shall ensure that:</p> <ul style="list-style-type: none"> • ERT members have received appropriate training. • ERT members have appropriate PPE (see SI-02 Personal Protective Equipment and OHS&ERP) and emergency equipment (IWDF-Form-42) on standby. <p>In the event of an incident during transport of waste to the IWDF, members of the ERT may be required to travel to the incident site, under the direction of the Operations Manager, in accordance with ERI-04 Transport Emergency Response.</p>		
5.6	<p>Muster Points and Accounting for Personnel</p> <p>Muster Points shall be defined and communicated to all site personnel during inductions, and during safety briefings (e.g., if the muster points change during operations).</p> <p>The Site Plan shall specify all muster locations.</p> <p>Upon mustering of personnel, the Operations Manager, Site Manager or Safety Manager, shall ensure that all personnel are accounted for, by checking the latest entries in the State Personnel and Visitor Logbook.</p>	In compliance	<p>Review of Site Plan included in the General Site Induction confirmed that the muster points were defined.</p> <p>Accounting for personnel was not required during audit / reporting period as no incidents occurred.</p>
5.7	<p>General Emergency Response Procedure</p> <p>A general Emergency Response Procedure shall be communicated to all personnel at the site, as outlined in the IWDF Emergency Response Procedure Information Sheet.</p> <p>This procedure must be posted around the site and personnel are required to familiarise themselves with these procedures.</p>	In compliance	<p>Observation and review confirmed that the general Emergency Response Procedure was included in the General Site induction package and is posted in the site office.</p>

Section	Requirement	Status	Evidence / Comment
5.8	<p>Specific Emergency Response Procedures There are three main types of specific emergency response procedure defined for the IWDF:</p> <ul style="list-style-type: none"> • injury and evacuation procedure; • waste incident emergency response procedure; and • fire response procedure. <p>Sheets summarising these procedures shall be posted around the site and shall be given to site personnel during their site inductions (Emergency Procedure Information Sheets).</p> <p>These emergency procedures are outlined in more detail in Emergency Response Instructions ERI-01, Injury and Evacuation Response, ERI-02 Waste Incident & Spill Response, and ERI-03 Fire Response.</p> <p>The Operations Manager, Safety Manager and Contractor Safety Supervisor shall be familiar with these procedures.</p>	In compliance	The General Site Induction package contained the required specific emergency response procedures and procedures were also posted in the site office.
5.9	<p>Communications & Notification Other members of the Project Team, family members (in the event of an accident) and authorities, shall be contacted in accordance with ERP-01 Incident Prevention, Reporting, and Investigation.</p>		See ERP-01 Incident Prevention, Reporting and Investigation.
5.10	<p>Emergency Debriefing After every emergency incident, a de-briefing session is to be held as soon as practicable and prior to recommencement of operations.</p> <p>The events leading to the incident, the impacts of the incident and the</p>	N/A	No emergency incidents occurred during audit period.

Section	Requirement	Status	Evidence / Comment
	<p>corrective/preventive actions are to be discussed (as identified during the emergency investigation).</p> <p>The Operations Manager shall ensure that a record of the debriefing session is taken and filed.</p>		
5.11	<p>Resumption of Operations Site operations shall only resume when the Operations Manager is satisfied that:</p> <ul style="list-style-type: none"> • The incident has been investigated and documented. • The cause of the incident has been rectified and that no residual risk remains in the incident area. • Further activity can proceed safely. • Approval has been given by the FMC Project Manager and the Finance Project Manager. • Approval has been given by WorkSafe (WA) if notifiable injuries have been incurred. 	N/A	No emergency incidents occurred during audit period.
ERI-01 Injury and Evacuation Response			
Purpose: must be followed in the event of a serious injury, which may require evacuation, at the IWDF.			
As there was no serious injury which required evacuation from the IWDF, this emergency response instruction was not audited.			
ERI-02 Waste Incident and Spill Response			
Purpose: This instruction must be followed in the event of any incident relating to chemical waste, radioactive waste, or other hazardous material, at the IWDF.			
As there was no incident relating to chemical waste or other hazardous material during the reporting period, compliance with this emergency response instruction was not audited.			
ERI-03 Fire Response			
Purpose: This instruction must be followed in the event of fire at the IWDF.			
As there was no fire event at the IWDF during the reporting period, compliance with this emergency response instruction was not audited.			

Section	Requirement	Status	Evidence / Comment
ERI-04 Transport Emergency Response			
Purpose: Must be followed in the event of an incident occurring during transport of waste to the IWDF.			
As there was no incident occurring during transport of waste to the IWDF, compliance with this emergency response instruction was not audited.			

4.3 IWDF Environmental, Health & Safety Management Program

4.3.1 Overview

The IWDF Environmental, Health and Safety Management Program provides the basis for the establishment and maintenance of effective management programs to achieve the standards, objectives, and targets for the IWDF, and to enable continual improvement in performance. The IWDF Environmental, Health and Safety Management Program is comprised of Management Plans and Action Plans.

4.3.2 Management Plans

These management plans are summary documents which have been developed to provide high level management goals, objectives, and targets for the following aspects of the IWDF's activities:

- Flora and fauna;
- Water;
- Air quality;
- Decommissioning and rehabilitation;
- Health and safety;
- Emergency response;
- Radiation;
- Transport:
- Waste acceptance;
- Community liaison; and
- Management review.

The management plans summarise the methods (i.e., procedures and operational controls) that are in place and must be maintained to achieve the on-going management goals, objectives, and targets, and hence sustain best practice operational performance.

4.3.3 Compliance Assessment

Table 8 documents the level of compliance with the requirements of each of the IWDF Management Plans for the reporting period. Management of the IWDF was, with one exception, compliant with the applicable requirements of the management plans during the reporting period.

The non-compliance recorded was related to Management Plan 10 which requires that:

A community liaison committee, containing members of the community meets at least four times per year to raise community concerns, review important documents and provide input into operational decision-making.

Only three meetings were held during the reporting period. It should be noted that on the 14 October 2021 the CLC agreed to hold three meetings per year however the Management Plan cannot be modified to reflect this until Ministerial Statement 562 is modified.

Table 8
IWDF Management Plans Compliance Assessment for July 2021 to June 2022

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
1	Air Quality	Finance contractors will undertake inspections to ensure that waste is appropriately packaged, transported, and unloaded to prevent spillage or rupture.	N/A	No waste disposal occurred during reporting period.
		If a waste package ruptures, the waste material will be covered as soon as possible, and any spillage immediately contained and recovered.	N/A	No waste disposal occurred during reporting period.
		Appropriate personal protective equipment and safety measures will be utilised when necessary.	N/A	No waste disposal occurred during reporting period.
		Dust suppression techniques will be employed during earthworks.	N/A	No waste disposal occurred during reporting period.
		Dust monitoring shall be undertaken.	N/A	No waste disposal occurred during reporting period.
		Vehicles and machinery will be serviced regularly to ensure optimal efficiency.	N/A	No waste disposal occurred during reporting period.
2a	Decommissioning and	Vegetation and topsoil cleared during operations is stockpiled nearby.	N/A	No waste disposal occurred during reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
	Rehabilitation -A Operation Specific and Ongoing	Cleared areas shall be rehabilitated using the stockpiled vegetation and topsoil following completion of their use (except for fenced disposal compounds and tracks used for access).	N/A	No waste disposal occurred during reporting period.
		Areas undergoing rehabilitation will be monitored annually and assessed by a botanist every ten years.	In compliance	See Appendix L for Rehabilitation Inspection Records. Assessment by botanist next due in September 2024.
		Upon completion of site works temporary infrastructure shall be removed.	N/A	No temporary infrastructure on site during reporting period.
		Disused tracks and road shall be allowed to revegetate naturally.	In compliance	Site inspection reports and aerial photography show that all disused tracks and roads have revegetated naturally.
2b	Decommissioning & Rehabilitation -B Long Term and Site Closure	<p>A decommissioning statement will be prepared six months prior to decommissioning.</p> <p>The decommissioning statement will include a zone of restricted occupancy outside the site perimeter as a region in which there is public access, but in which permanent occupancy is prohibited for the institutional control period.</p>	N/A	Not yet required as the IWDF remains operational.
3	Emergency Response	Develop and implement effective and appropriate emergency response procedures.	In compliance	ER procedures and work instructions have been developed for the IWDF and approved by the EPA. See page 29 of this PCR for list of ER procedures and work instructions.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Report thoroughly on all emergency or potential emergency incidents.	N/A	No emergency or potential emergency incidents occurred during reporting period.
		Investigate all incidents, accidents and near misses and implement corrective actions to prevent recurrence.	N/A	No emergency or potential emergency incidents occurred during reporting period.
		Provide all personnel with the appropriate equipment and training.	In compliance	General site inductions were completed for all visitors to the IWDF during the reporting period.
4	Flora and Fauna	Flora and fauna surveys shall be undertaken to identify species at the site.	In compliance	Fauna Assessment was completed in 2009 by Coffey Environments. See 2009 PCR for report. Botanical assessment was completed in 2014. See 2014 – 2015 PCR for report. A botanical assessment will be undertaken in 2024.
		Prior to any clearing, the conservation status of plants in that area will be determined and clearing avoided in areas containing priority species.	N/A	Not required during reporting period as no clearing occurred.
		A botanist shall be brought to site prior to significant clearing, where necessary.	N/A	Not required during reporting period as no clearing occurred.
		Unnecessary clearance or disturbance of vegetation shall be avoided	N/A	No clearing occurred during reporting period.
		Fauna injuries and deaths will be treated as environmental incidents.	N/A	No environmental incidents were recorded during reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Drivers within the site shall be aware of native fauna.	In compliance	Native fauna awareness was included in the general site induction for all personnel visiting the IWDF during the reporting period.
		Trenches and boreholes shall be designed to prevent the trapping of fauna.	In compliance	FMC Operation Manager confirmed all boreholes and trenches are capped to prevent fauna ingress.
		Dust suppression techniques shall be used during operations.	N/A	No waste disposal occurred during reporting period.
		Priority flora identification kit to be regularly updated.	In compliance	Priority flora identification kit was reviewed prior to the October 21 monitoring event and no changes were required.
		Weed identification kit shall be regularly updated.	In compliance	The weed management plan and identification kit were reviewed Oct 2021 and no changes were required.
5	Health and Safety	Comply with Operation Health and Safety and Emergency Response Procedures.	In compliance	Where applicable – during site inspection visits.
		Maintain a Health & Safety Aspects and Impacts Register.	In compliance	The Aspects and Impacts Register was reviewed and updated Dec 2021 and May 2022.
		Ensure Safety Data Sheets are readily available.	In compliance	SDS are available in hardcopy at the IWDF site office and electronically in the IWDF Document Library.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Report all incidents and near misses and implement corrective actions.	N/A	No incidents or near misses were reported for the reporting period.
		Ensure appropriate safety equipment is worn and maintained, and all personnel are adequately trained.	In compliance	All personnel visiting the IWDF completed the general site induction.
		Hold safety management briefings, as appropriate to activities.	N/A	No disposal operation occurred during the reporting period.
		To undertake regular site safety inspections and operation safety audits.	N/A	No disposal operation occurred during the reporting period.
		Replace fire extinguishers every five years	In compliance	Fire extinguishers were last replaced in Jan 2020.
6	Radiation	All radioactive wastes will be assessed against the Acceptance Criteria for Radioactive Wastes and be packaged and transported in the approved manner.	In compliance	Although radioactive waste acceptance applications (proformas) were received during reporting period no radioactive waste was transported. Waste acceptance applications received were assessed against the waste acceptance criteria and draft Safety Assessment and Safety Case for the IWDF.
		The Radiological Council shall approve the design and location of the disposal trench.	N/A	Not required as a radioactive disposal operation did not occur during reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Radioactive waste will be placed in the trench in accordance with the RCWA Approvals and the position and activity of each drum recorded.	N/A	A radioactive disposal operation did not occur during reporting period.
		A permanent marker shall be placed above all trenches containing radioactive waste	In compliance	Inspection has confirmed that a permanent marker has been placed at each disposal cell.
		All personnel who come into proximity with radioactive waste shall attend an induction and wear personal radiation monitors.	N/A	A radioactive disposal operation did not occur during reporting period.
		Pre-disposal, ongoing and occupational radiation monitoring shall be undertaken.	N/A	A radioactive disposal operation did not occur, and ongoing monitoring not required during reporting period.
		Predisposal and post disposal environmental radiation monitoring.	N/A	Not required as a radioactive disposal operation did not occur during reporting period.
		Monitoring program for public dose constraint shall be undertaken.	In compliance	See Section 5.4 of this PCR.
		Gamma radiation surveys are to be conducted every five years, or associated with a burial operation involving radioactive waste, whichever is the shortest interval – last survey completed Sept 2017.	N/A	Next gamma radiation survey is due to be undertaken in October 2022.
		Third party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NH&MRC, 1993) every	N/A	Next third-party technical compliance audit is due October 2023.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		<p>five years (last completed October 2018) – although new code has been released compliance with the 1993 CoP is still required as it is called up in s31A of the Radiation Safety Regulations 1983 and the IWDF registration.</p>		
		<p>Copy of each radiation monitoring report and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NH&MRC, 1993) to RCWA.</p>	In compliance	<p>A copy of the third-party technical compliance audit was provided to RCWA on the 21 July 2021. No radiation monitoring was required for the reporting period.</p>
		<p>Copy of each radiation monitoring report and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NH&MRC, 1993) to CLC.</p>	In compliance	<p>A hardcopy of the third-party technical compliance report, received on the 9 June 2021, was tabled at the CLC meeting held 10 June 2021. See Appendix K for CLC meeting minutes 10 June 2021.</p>
		<p>Annual Performance and Compliance Report which will include a copy of all radiation monitoring for relevant reporting periods and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NH&MRC, 1993) when completed.</p>	N/A	<p>No radiation monitoring or third-party technical compliance auditing was required during the reporting period.</p>
7	Transport	<p>Operation Transport Procedures (OTP) shall be developed for each operation, which provide details of transport and packaging, emergency preparedness, contractor responsibilities, procedures, communications, and emergency response recovery, and are submitted to the EPA.</p>	N/A	<p>No disposal operation occurred during the reporting period.</p>

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Procedures for communications with the emergency response team, local community and emergency services shall be prepared and detailed in the OTP.	N/A	No disposal operation occurred during the reporting period.
		Waste shall be packaged, labelled, and transported in accordance with the OTP and applicable dangerous goods and radioactive legislation, and a Finance delegate will inspect prior to transport to ensure compliance.	N/A	No disposal operation occurred during the reporting period.
		Personnel involved in loading and transport of waste (including contractors) shall be briefed on the potential risks, emergency response and communication procedures.	N/A	No disposal operation occurred during the reporting period.
		Appropriate protective clothing and equipment shall be used.	N/A	No disposal operation occurred during the reporting period.
		Emergency Response Team (ERT) members shall be appropriately trained and equipped.	N/A	No disposal operation occurred during the reporting period.
		Shipping documentation, OTP and emergency information shall be kept in the transport vehicle.	N/A	No disposal operation occurred during the reporting period.
		If required, the Department of Fire & Emergency Services (DFES), Department of Mines, Industry Regulation & Safety (DMIRS), and the local shires shall be informed of transport routes and schedules.	N/A	No disposal operation occurred during the reporting period.
8	Water	Operations will not be planned for the wet season.	N/A	No disposal operation occurred during the reporting period.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		Regular weather reports will be obtained during waste disposal periods and site activities scheduled to avoid waste acceptance and burial activities during rainfall.	N/A	No disposal operation occurred during the reporting period.
		The trench and drainage systems will be designed and positioned to avoid the infiltration of surface water and potential groundwater effects.	N/A	No disposal operation occurred during the reporting period.
		When heavy rainfall is expected, temporary berms and V drains will be constructed and any waste in the open trench covered with compacted sand and gravel.	N/A	No disposal operation occurred during the reporting period.
		Groundwater monitoring shall be undertaken regularly.	In compliance	Groundwater monitoring was undertaken in Oct 2021, and April 2022 – see Appendix U for groundwater monitoring records.
		Water which accumulates in the trench, will be allowed to dry in situ, or if suspected to be contaminated, removed, and analysed.	N/A	No disposal operation occurred during the reporting period.
9	Waste Acceptance	Ensure all waste owners wishing to dispose of waste at the IWDF provide adequate details of the wastes, in accordance with Waste Acceptance Guidelines.	In compliance.	All waste acceptance applications received were reviewed by the FMC/RSO for completeness before an assessment of the waste against the waste acceptance criteria was undertaken.
		Assess a waste owner's waste details against the waste acceptance criteria.	In compliance	All complete waste disposal applications were assessed against the IWDF waste acceptance criteria, safety assessment, and

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
				safety case and a report for each application was provided to Finance for actioning.
		Provide details of the wastes in the Operation Environmental and Waste Acceptance Environmental procedures submitted to the EPA.	N/A	No disposal operation occurred during the reporting period.
		Undertake inspections of the waste.	In compliance	Review of waste assessments confirmed that, where applicable, waste was inspected by the FMC or RSO and photographs included in the assessment report.
10	Community Liaison	Maintain a public database which provides details of all waste disposed at the IWDF. This shall be accessible through the Finance office in Perth.	In compliance	The IWDF Waste Inventory Database contains the information required to be made publicly available. The publicly available information is accessible through the Finance office in Perth.
		Respond efficiently to complaints and undertake appropriate corrective actions.	N/A	No complaints were received during 2021 – 2022 reporting period.
		An archiving schedule and record retention table are maintained to ensure that documents are archived to allow future generations access to the information.	In compliance	Finance has in place a Retention and Disposal schedule which includes all appropriate IWDF records. This R&D schedule was approved by the State Records Commission in March 2014. See Appendix H.

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
		A community liaison committee, containing members of the community meets at least four times per year to raise community concerns, review important documents and provide input into operational decision-making.	Non-compliance	The CLC met three times during the reporting period. Meetings were held 14 Oct 2021, 10 Feb 2022, and 30 Jun 2022. It should be noted that the CLC agreed to meet three times per year at the meeting held 14 October 2021.
		Ensure information regarding the IWDF on Government web page for the IWDF – handbook, brochure etc. is always up to date.	In compliance	Review confirmed that the latest version of the IWDF handbook and brochure were available on the Government web page for the IWDF.
11	Review of Management	Undertake regular audits of the management system.	In compliance	The management system was audited during reporting period – see tables 6 and 7 of this PCR for audit tables.
		Hold management review meetings twice yearly.	In compliance	Management Review Meetings were held 16 Dec 2021 and 02 Jun 2022. See Appendix Q for minutes.
		Undertake disposal operation audit of operational procedures.	N/A	No disposal operation occurred during the reporting period.
		Produce an annual performance and compliance report and provide to EPA and RCWA for review.	In compliance	This PCR.
		Correct any non-conformances as soon as possible and ensure corrective/preventative actions are in place.	In compliance	Although three non-compliances for the reporting period have been recorded only one CAR has been raised. The non-compliances are all related to the same issue, the

MP No	Title	Management Plan Requirements	Compliance Status	Evidence / Comment / Suitability
				frequency of CLC meetings. Corrective action is still being investigated.
		Regularly review the situation regarding current disposal practices and the awareness of international best practices and advances in technology.	In compliance	Review was completed during the reporting period and the results reported at the Management Review Meetings. See Appendix Q for MRM minutes.
		Liaise regularly with national and international waste management regulators.	In compliance	Liaison with the International Atomic Energy Agency, UK, European facilities, and regulators occurred during reporting period. Results are reported at the Management Review Meetings. See Appendix Q for MRM minutes.

4.3.4 Ongoing Suitability of Management Plans and System Documents

The IWDF has in place a set of high-level management plans and two comprehensive management systems (Finance and FMC) that were developed to meet the functional requirements of the following International Standards:

- ISO 9001 – Quality
- ISO 14001 Environmental
- ISO 45001 Safety.

All three standards have the following principles as their basis:

- a. Process and system methodology;
- b. Integration of quality, safety and environmental requirements into the functions and processes;
- c. Direction established through planning, policy, objectives and targets;
- d. Commitment and involvement by all and especially senior management;
- e. Provision of “fit for purpose” resources and competent staff;
- f. Identification of risk and elimination or minimisation of these risks;
- g. Compliance and risk management;
- h. Communication and consultation;
- i. Documented system;
- j. Monitor, measure, audit, review;
- k. Responsibilities and accountabilities;
- l. Intervention when things go wrong and implementation of corrective and preventative action; and
- m. Continuous Improvement.

The approach, structure, and content of the IWDF management plans and management systems were approved by the EPA and where relevant the RCWA prior to implementation.

Continuous improvement in the management of the IWDF is achieved by implementing processes as follows:

- Regular current awareness monitoring and review of international advances in technology and current best practices for near surface disposal of hazardous and low-level radioactive wastes. This information is regularly discussed at project meetings, management team meetings and is included, where applicable, in operational documentation such as management plans, the IWDF aspects and impacts register, operational and ongoing management procedures.
- Monitoring and review of legislation, regulations, standards, and guidelines applicable to or that may impact near surface disposal of hazardous and low-level radioactive wastes. This information is regularly discussed at project meetings, management team meetings and is included, where applicable, in operational documentation such as management plans, IWDF aspects and impacts register, operational and ongoing management procedures.

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- Regular review, update, and modification of all IWDF processes and documentation informed by the knowledge obtained from the above activities and compliance auditing of such requirements ensures that all IWDF processes and documentation such as management plans and procedures continue to meet the objectives for the IWDF.

The ongoing suitability of the IWDF Management Plans and other system documents is discussed at the Management Review Meetings. See Appendix Q for Management Review Meeting minutes.

4.3.5 Action Plans

The Action Plans describe Finance's specific improvement objectives, both long and short term, which demonstrate continual improvement in performance and provide quantitative targets, timeframes, and personnel for achieving these objectives. Progress against each action in the Actions Plans is updated monthly and is a standing agenda item at the monthly management meetings.

The Action Plans for the 2021 - 2022 reporting period are included as Appendix R.

4.4 IWDF Safety Assessment and Safety Case

A draft safety assessment and draft operations safety case were submitted to the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) in December 2016 for third party review. ARPANSA provided feedback on the draft safety assessment on the 15 October 2020.

A high-level response to the feedback was prepared and provided to the RCWA, on 8 December 2020, for comment. On the 20 September 2021, RCWA agreed with the proposed approach, as outlined in the high-level response, to updating the draft operation and post closure safety assessment and the facility safety case.

There are currently three separate deliverables in production:

- Post-Closure Safety Assessment (PCSA) based on agreed postulated external accident events during the Institutional Control Period (ICP) and agreed future limits on radioactive inventories for disposal (based on database records).
- Operations Safety Assessment (OSA) based on previous draft OSA and incorporating requirements of RPSC-3 Disposal Code and ARPANSA recommendations (this part applies to PCSA too).
- Facility Safety Case (FSC) which will refer to OSA, PCSA, supporting deterministic and probabilistic assessments and historical safety assessments for siting, design, and construction of the IWDF.

When completed the draft documents will be submitted to the RCWA for approval.

5. ENVIRONMENTAL MONITORING RESULTS

Environmental monitoring is a fundamental component of both waste disposal operations and ongoing management at the IWDF. Groundwater, capping, radiation, and rehabilitation monitoring is undertaken irrespective of whether disposal operations are planned or undertaken, whereas other environmental monitoring such as some radiation monitoring, dust monitoring and soil sampling are undertaken on an operation-specific basis. The groundwater, trench capping and rehabilitation monitoring locations are shown on Figure 4.

5.1 Rehabilitation Monitoring

Rehabilitation monitoring occurs annually and involves recording the percentage coverage of vegetation in the rehabilitated areas around each disposal cell, maximum and average height of the plants, and the number of plant types. Photographs are taken at specific locations during each monitoring event for comparison and review (Figure 4).

The October 2021 rehabilitation monitoring showed good vegetation growth. No plant deaths were recorded. In some areas around the 2020NRT01 disposal cell rehabilitation appears to be restricted by the presence of fine clay. See Appendix L for rehabilitation monitoring records.

A vegetation survey completed, in October 2014, verified that the rehabilitated vegetation around the pre 2000 disposal cells was indistinguishable from the surrounding vegetation. No further monitoring of the vegetation around the pre 2000 disposal cells will occur.

5.2 Disposal Dome (Capping) Monitoring

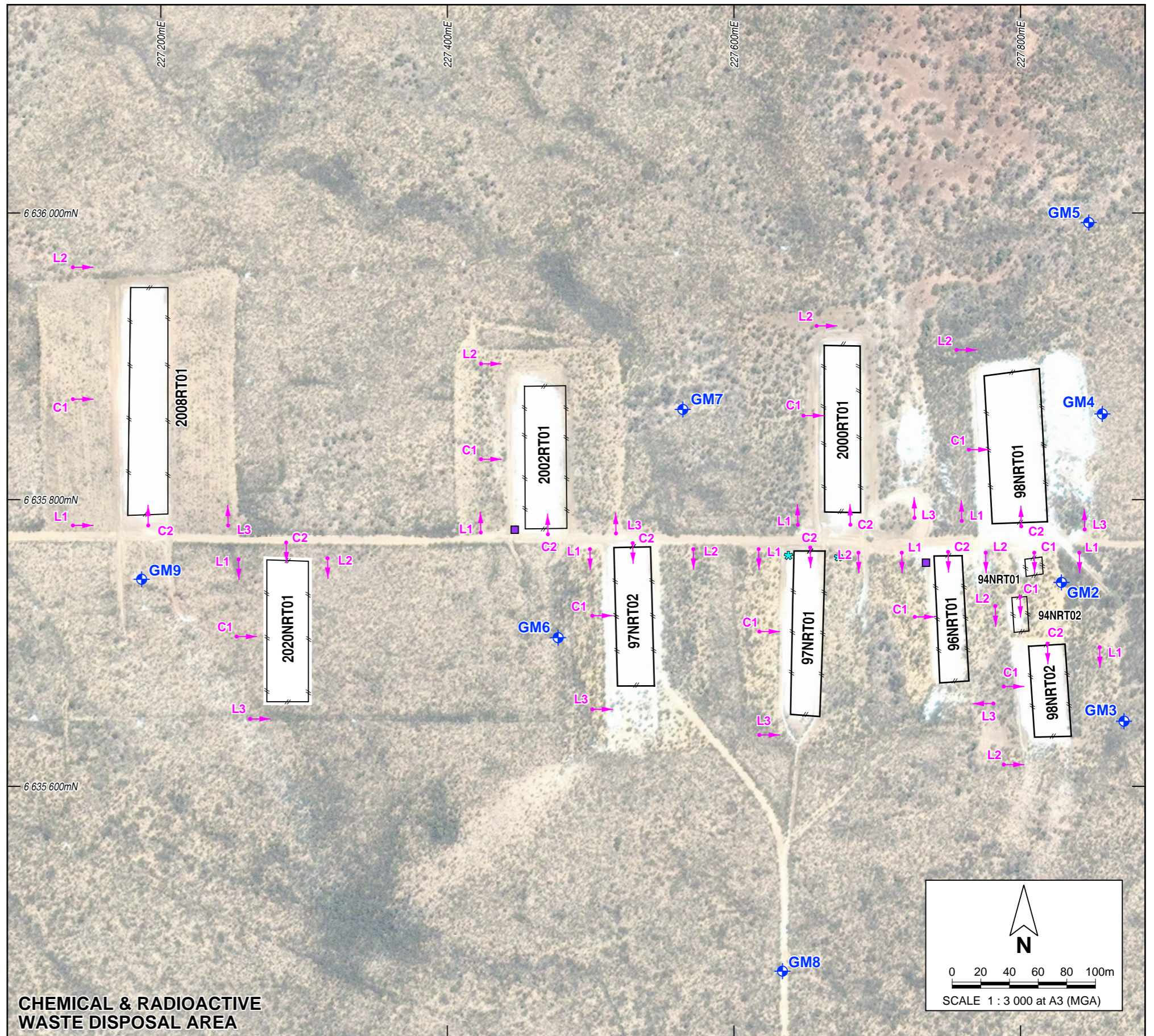
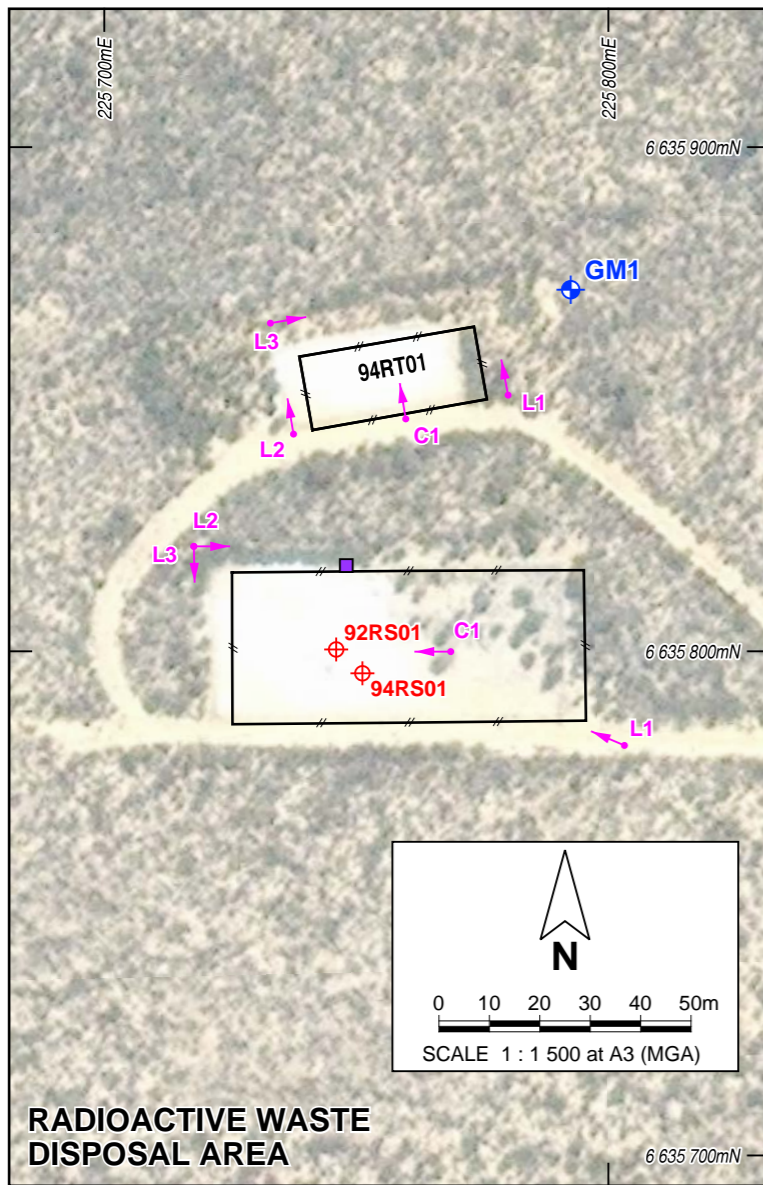
Monitoring of the disposal domes (the water shedding clay caps which overlie each disposal cell) also occurs annually and involves the recording of any erosion channels on the domes (number and depth) and any subsidence features (number and depth).

The most recent capping monitoring was completed in October 2021. It was found that the very minor erosion in the capping of the 2000RT01 disposal cell remains unchanged from the previous monitoring event. See Appendix M for capping monitoring report.

5.3 Groundwater Monitoring

Groundwater monitoring was completed in October 2021 and April 2022. There has been no groundwater detected on the site since the first bore was installed and as a result water quality cannot be tested. Ongoing six-monthly groundwater monitoring, undertaken since 2000, has shown that no groundwater has been found in any of the monitoring bores present at the site.

The October 2021, and April 2022 groundwater monitoring records are provided as Appendix U.



Legend

- Fence
- 2008RT01** Trench or Shaft ID
- Location of Groundwater Monitoring Bore
- Location of Radioactive Waste Shaft
- Photograph Location and Direction
- C3** Trench Capping Photograph Location ID
- L3** Rehabilitation Photograph Location ID
- Location of Calytrix creswellii P3
- Location of Lepidosperma sp

NOTE: Photograph Location IDs are used in conjunction with Trench IDs.



Government of **Western Australia**
Department of Finance

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA

**GROUNDWATER, TRENCH CAPPING &
REHABILITATION MONITORING LOCATIONS**

Figure 4

Drawn: M. Shepherd

Date: 30 Aug 2020

Job: DF12020-001

5.4 Public Dose Constraint Monitoring

Measurement of public dose exposures under normal operations (care and maintenance) to demonstrate that the public dose constraint is achievable was implemented at the IWDF in March 2021. Thermo-Luminescent Dosimeter (TLD) badges provided by Landauer Australia are used to monitor whole body dose exposures.

A TLD badge is issued to an FMC staff member to wear and one control TLD is placed at the IWDF site office to monitor whole-body dose exposures when visiting the IWDF.

Whole-body dose exposure monitoring comprises of quarterly periods between the calendar months April and March. The whole-body dose is recorded by TLD badges every three months and cumulative dose calculated over the period of a year to determine the annual dose exposure. Whether site visits are undertaken or not, or whether multiple visits are undertaken within a quarterly period, the cumulative dose is still recorded by the TLD badges for the whole calendar year. Hence, the dose monitoring period was between 30/03/2021 to 31/03/2022 for the 2021-2022 annual dose record and the dose monitoring period for the 2022-2023 annual dose record will be between 01/04/2022 and 31/03/2023.

Table 9 below shows the dose exposure results between 30 March 2021 and April 2022. It should be noted that the TLD badge dose accumulation has only been recorded for the quarterly periods that encompass the dates of the site visits and therefore the potential public dose exposures.

Table 9
Dose Exposure Results for March 2021 to April 2022

Period of Site Visit	Dose Exposure (mSv)
30/03/21 to 01/04/21	0.01
31/08/21 to 02/09/21	0.01
22/09/21 to 23/09/21	
11/11/21 to 14/11/21	*M
04/04/22 to 06/04/22	*M

*M: dose exposure below the minimum measurable quantity for the monitoring period.

Results have returned a dose exposure that was below the Minimum Detection Level (MDL) of 0.01 mSv for each quarter. The total accumulated dose for the 2021 - 2022 calendar year was 0.02 mSv. The total accumulated dose for April to June 2022 calendar months was MDL (0.01 mSv). A public dose constraint has been set for the IWDF of 0.3 mSv/year in line with International Atomic Energy Agency (IAEA) and ARPANSA guidance. Dose exposures were well below the dose constraint.

6. OUTSTANDING CLC MINUTES

The following CLC minutes were not included in previous Performance and Compliance Reports and have been included in this Report for completeness:

- CLC Meeting of 24 June 2020 (Appendix Z)
- CLC Meeting of 10 June 2021 (Appendix AA).

APPENDICES

APPENDIX A

Ministerial Statement 562



Statement No.

000562

MINISTER FOR THE ENVIRONMENT;
LABOUR RELATIONS

STATEMENT TO AMEND CONDITIONS APPLYING TO PROPOSALS
(PURSUANT TO THE PROVISIONS OF SECTION 46 OF THE
ENVIRONMENTAL PROTECTION ACT 1986)

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, SHIRE OF COOLGARDIE

- Proposals:** (1) Integrated Waste Disposal Facility, Eastern Goldfields, (Assessment No. 168); and
- (2) Disposal by Shaft Entombment or Trench Burial of a Range of Intractable Wastes at the Intractable Waste Disposal Facility, Mt Walton East, Shire of Coolgardie (Assessment No. 823).
- Proponent:** Waste Management (WA)
- Proponent Address:** Level 8, 141 St George's Terrace, PERTH WA 6000
- Assessment Number:** 1286
- Previous Assessment Numbers:** 168, 168-1, 823, 1127
- Previous Statement Numbers:** Statement No. 044 published on 26 October 1988
Statement No. 205 published on 8 January 1992
Statement No. 353 published on 28 April 1994
Statement No. 533 published on 19 January 2000

Report of the Environmental Protection Authority: Bulletin 1005

Previous Reports of the Environmental Protection Authority: Bulletins 353, 572, 726 and 954

The implementation of the proposals to which the above reports of the Environmental Protection Authority relate is now subject to the following consolidated environmental conditions and procedures which replace all previous conditions and procedures:

1 Implementation

- 1-1 Subject to these conditions and procedures, the proponent shall implement the proposals as documented in schedule 1 of this statement.

Published on

01 FEB 2001

- 1-2 Where the proponent seeks to change any aspect of the proposals as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the Environmental Protection Authority, is substantial, the proponent shall refer the matter to the Environmental Protection Authority.
- 1-3 Where the proponent seeks to change any aspect of the proposals as documented in schedule 1 of this statement in any way that the Minister for the Environment determines, on advice of the Environmental Protection Authority, is not substantial, those changes may be effected.

2 Proponent Commitments

- 2-1 The proponent shall implement the environmental management commitments of 25 October 2000 as documented in schedule 2 of this statement.
- 2-2 The proponent shall implement subsequent environmental management commitments which the proponent makes as part of the fulfillment of conditions and procedures in this statement.

3 Proponent

- 3-1 The proponent for the time being nominated by the Minister for the Environment under section 38(6) or (7) of the Environmental Protection Act 1986 is responsible for the implementation of the proposals until such time as the Minister for the Environment has exercised the Minister's power under section 38(7) of the Act to revoke the nomination of that proponent and nominate another person in respect of the proposals.
- 3-2 Any request for the exercise of that power of the Minister referred to in condition 3-1 shall be accompanied by a copy of this statement endorsed with an undertaking by the proposed replacement proponent to carry out the proposals in accordance with the conditions and procedures set out in the statement.
- 3-3 The proponent shall notify the Environmental Protection Authority of any change of proponent contact name and address within 30 days of such change.

4 Commencement

- 4-1 The proponent shall provide evidence to the Minister for the Environment within five years of the date of this statement that the proposals have been substantially commenced.
- 4-2 Where the proposals have not been substantially commenced within five years of the date of this statement, the approvals to implement the proposals as granted in this statement shall lapse and be void. The Minister for the Environment will determine any question as to whether the proposals have been substantially commenced.

- 4-3 The proponent shall make application to the Minister for the Environment for any extension of approval for the substantial commencement of the proposals beyond five years from the date of this statement at least six months prior to the expiration of the five year period referred to in conditions 4-1 and 4-2.
- 4-4 Where the proponent demonstrates to the requirements of the Minister for the Environment on advice of the Environmental Protection Authority that the environmental parameters of the proposals have not changed significantly, then the Minister may grant an extension not exceeding five years for the substantial commencement of the proposals.

5 Compliance Auditing

- 5-1 The proponent shall submit periodic Compliance Reports, in accordance with an audit program prepared in consultation between the proponent and the Environmental Protection Authority.
- 5-2 Unless otherwise specified, the Environmental Protection Authority is responsible for assessing compliance with the conditions, procedures and commitments contained in this statement and for issuing formal written advice that the requirements have been met.
- 5-3 Where compliance with any condition, procedure or commitment is in dispute, the matter will be determined by the Minister for the Environment.


CHERYL EDWARDES (Mrs) MLA
MINISTER FOR THE ENVIRONMENT

01 FEB 2001

Schedule 1

Summary of key proposal characteristics (1286) .

Element	Description
Location	Approximately 125 km north-west of Kalgoorlie-Boulder in the Shire of Coolgardie
Area	25 square kilometres
Purpose	For the disposal of intractable wastes for which there is no other practical method of disposal.
Potential waste	Restricted to those that meet the waste acceptance criteria
Disposal method	Burial by shaft entombment or trench, capped with water-shedding dome.
Environmental Management	<p>Environmental Management Plans as listed below:</p> <ul style="list-style-type: none"> • flora and fauna; • water; • air quality; • decommissioning and rehabilitation; • health and safety; • emergency response; • radiation; • transport. <p>Procedures for each disposal operation developed consistent with Operational Guidelines as listed below:</p> <ul style="list-style-type: none"> • environmental; • health and safety and emergency response; • radiation; • transport.
Reporting	Long term monitoring and operational monitoring to be addressed in Environmental Management Plans.

Note: The incinerator component of the original proposal (assessment no. 168) will not proceed and has been removed from the description of the proposal.

Figure

Figure 1: Site Location (attached)

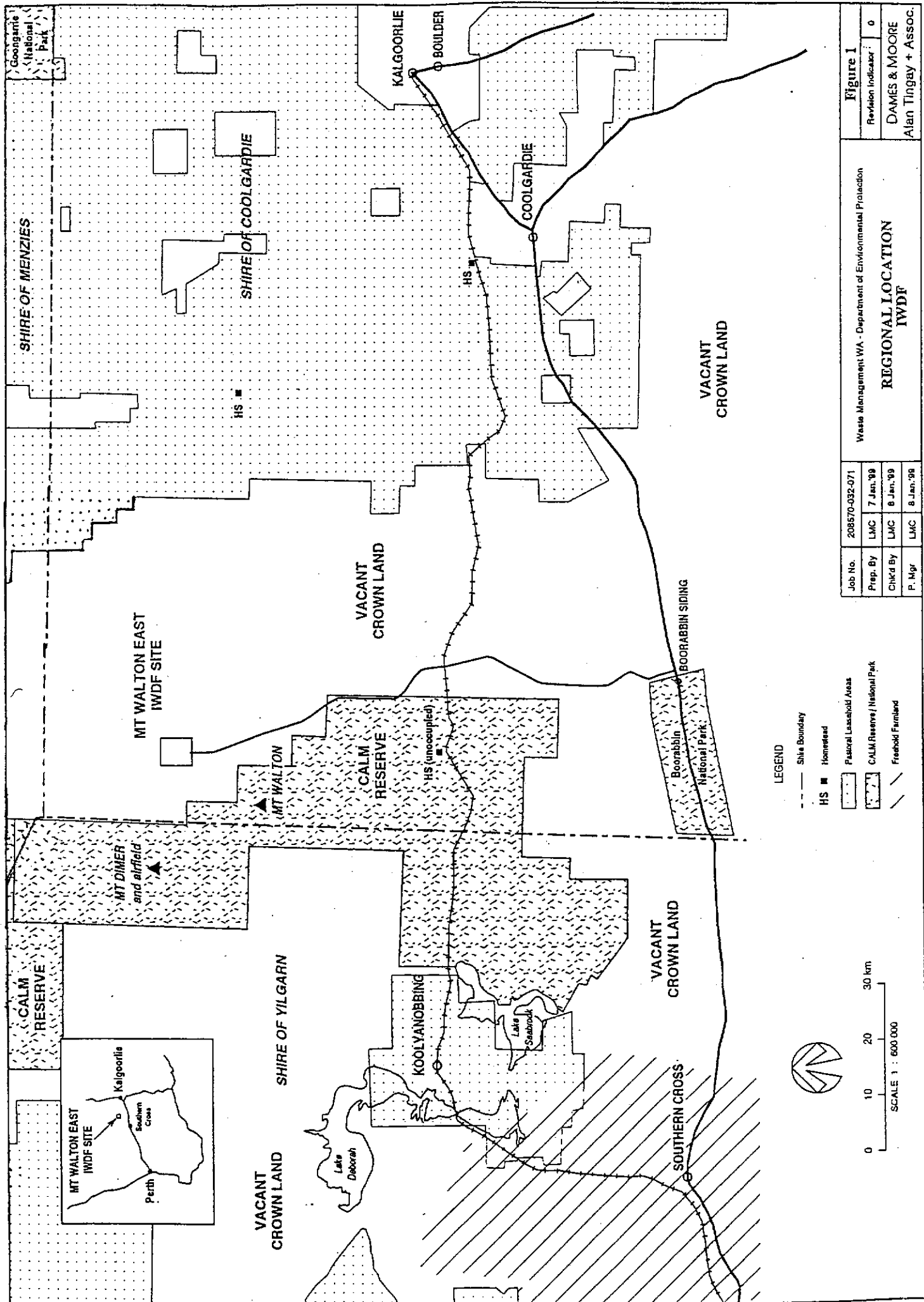


Figure 1. Site location.

**Proponent's Consolidated Environmental Management
Commitments**

25 October 2000

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, SHIRE OF COOLGARDIE (Two proposals)
(Assessment No. 1286)**

Waste Management (WA)

(The Health Department of Western Australia was formerly the proponent.)

Schedule 2 - Proponent's Consolidated Environmental Management Commitments of 25 October 2000
(Assessment No. 1286)

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
1	Environmental Management System	<p>(1.1) Demonstrate that there is in place an Environmental Management System that includes the following elements:</p> <ul style="list-style-type: none"> (a) an environmental, health and safety policy and corporate commitment to it; (b) mechanisms and processes to ensure: <ul style="list-style-type: none"> • Planning to meet environmental, health and safety requirements; • Implementation and operation of actions to meet environmental, health and safety requirements; • Measurement and evaluation of environmental, health and safety performance; and (c) review and improvements of environmental, health and safety outcomes. <p>(1.2) Implement the Environmental Management System required by commitment 1.1.</p>	<p>To effectively and comprehensively manage all matters relating to environmental protection and to fulfil the requirements of the conditions, procedures and commitments for the proposal.</p>	<p>Prior to the next disposal operation.</p>	<p>Environmental Protection Authority</p>		<p>Completed Environmental Management System</p>
			<p>To effectively and comprehensively manage all matters relating to environmental protection and to fulfil the requirements of the conditions, procedures and commitments for the proposal.</p>	<p>Prior to the next disposal operation</p>	<p>Environmental Protection Authority</p>		<p>Performance and Compliance Report</p>

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA
2	Environmental Management Program	(2.1) Prepare an Environmental Management Program. (2.2) Advertise and make the approved Environmental Management Program required by commitment 2.1 publicly available. (2.3) Implement the Environmental Management Program required by commitment 2.1.	To include but not be limited to the following: <ul style="list-style-type: none"> • environmental management plans (see commitment 3); and • operational guidelines (see commitment 4). To inform the community. To ensure that requirements specified in the approved Environmental Management Program are adhered to.	Prior to the next disposal operation. Prior to the next disposal operation. During all disposal operations.	Environmental Protection Authority Environmental Protection Authority Environmental Protection Authority		Approved Environmental Management Program Performance and Compliance Report Performance and Compliance Report
3	Environmental Management Plans Flora and Fauna	(3.1) Prepare a Flora and Fauna Management Plan.	To ensure that the abundance, species diversity, geographic distribution and productivity of vegetation communities and terrestrial fauna are maintained by monitoring against existing baseline survey data.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan

No.	TOPIC	ACTION	OBJECTIVES/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
	Transport Management Plan	(3.2) Prepare a Transport Management Plan that describes the general principles of managing the transportation of wastes to the Intractable Waste Disposal Facility. The plan will include but not limited to: <ul style="list-style-type: none"> • emergency preparedness; • contractor responsibilities; • procedures; • communications; and • emergency response recovery. 	To ensure that risk to the community, waste owners, contractors, employees, personnel and members of the emergency response services, property and the environment is minimised.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Water Management Plan	(3.3) Prepare a Water Management Plan.	To detail procedures and strategies to monitor: <ul style="list-style-type: none"> • for the presence of groundwater and if groundwater is present, groundwater will be analysed to determine whether it has been contaminated by leachate from disposed waste; and • surface water to ensure that if surface water is likely to run off the site it will be analysed to determine whether it has been contaminated if there has been a spillage of waste. • If contamination has occurred, a contingency plan that forms part of the Water Management Plan will be implemented. 	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
	Emergency Response Plan	(3.4) Prepare an Emergency Response Management Plan.	To ensure that in the case of an incident at the Intractable Waste Disposal Facility: <ul style="list-style-type: none"> all practicable measures are taken to ensure the welfare and amenity of the community; and the environment is not adversely affected. 	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Health and Safety Management Plan	(3.5) Prepare a Health and Safety Management Plan. The Plan will include but not limited to: <ul style="list-style-type: none"> procedures for training; and procedures for monitoring. 	To ensure that all practicable measures are taken to safeguard the welfare and amenity of personnel and the community at the Intractable Waste Disposal Facility.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Air Quality Management Plan	(3.6) Prepare an Air Quality Management Plan.	To detail monitoring procedures and strategies to suppress dust and odour adequately to ensure that dust and odour emissions do not adversely affect the environment, or health, welfare and amenity of personnel at the Intractable Waste Disposal Facility.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Environmental Management Plan
	Radiation Management Plan	(3.7) Prepare a Radiation Management Plan which will include but not be limited to: <ul style="list-style-type: none"> environmental radiation monitoring; periodic reporting to the Environmental Protection Authority and Radiological Council (Western Australia); procedures for compliance with the Code of Practice for the Near-surface Disposal of Radioactive Waste in Australia (1992); personnel radiation monitoring; and reporting of the monitoring results to the Community Liaison Committee. 	To detail procedures and strategies to ensure that risk of exposure to radiation is kept within public health standards and as low as reasonably achievable for the community, waste owners, contractors, employees, personnel and members of emergency response services, and the environment.	Prior to the next disposal operation.	Environmental Protection Authority	Radiological Council (WA)	Approved Environmental Management Plan

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASURE-MENT / COMPLIANCE CRITERIA
	Decommissioning and Rehabilitation Management Plan	<p>(3.8) Prepare a Decommissioning and Rehabilitation Management Plan to include but not be limited to:</p> <ul style="list-style-type: none"> • removal or, if appropriate, retention of infrastructure; • rehabilitation of all disturbed areas to a standard suitable for agreed future land use/s; and • identification of disposal areas, including provision of evidence of notification to relevant statutory authorities. 	<p>To ensure that the proposal is decommissioned and rehabilitated to a standard suitable for the future landuse/s.</p>	<p>At least six months before decommissioning.</p>	<p>Environmental Protection Authority</p>	<p>Radio-logical Council (WA)</p>	<p>Approved Environmental Management Plan</p>
		<p>(3.9) Make the draft Environmental Management Plans required by commitment 3.1 to 3.8 available for a four week limited stakeholder review to the:</p> <ul style="list-style-type: none"> • IWDF Community Liaison Committee; • The Chamber of Minerals and Energy of Western Australia; and • Chamber of Commerce and Industry of Western Australia; <p>prior to the Environmental Protection Authority finalising its consideration of the Plans.</p>	<p>To obtain stakeholder input to the Environmental Management Plans.</p>	<p>Prior to the next disposal operation. (Note: commitment 3.8 requires stakeholder review at least 6 months prior to decommissioning.)</p>	<p>Environmental Protection Authority</p>		<p>Approved Environmental Management Plan</p>
		<p>(3.10) Advertise and make the approved Environmental Management Plans required by commitments 3.1 to 3.8 publicly available.</p>	<p>To inform the community.</p>	<p>Prior to the next disposal operation. (Note: commitment 3.8 requires advertising and making publicly available at least 6 months prior to decommissioning.)</p>	<p>Environmental Protection Authority</p>		<p>Performance and Compliance Report</p>

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
		(3.1) Implement the Environmental Management Plans required by commitments 3.1 to 3.8.	To ensure that requirements specified in the approved Environmental Management Plans are adhered to.	During each disposal operation. (Note: commitment 3.8 requires implementation at least 6 months prior to decommissioning.)	Environmental Protection Authority		Performance and Compliance Report
4	<u>Operational Guidelines</u> Waste Acceptance Environmental Safety / Emergency Response Transport Radiation	(4.1) Prepare the Waste Acceptance Operational Guidelines. (4.2) Prepare the Environmental Operational Guidelines. (4.3) Prepare the Safety/Emergency Response Operational Guidelines. (4.4) Prepare the Transport Operational Guidelines. (4.5) Prepare the Radiation Operational Guidelines.	All relevant Operational Guidelines are to be used as a guide to the proponent for the preparation of the Operational Procedures for each particular disposal operation (see commitments 5.1 and 5.2). The Operational Guidelines give guidance to the proponent on the means for achieving environmental outcomes required by a particular waste disposal operation.	Prior to the next disposal operation.	Environmental Protection Authority		Approved Operational Guidelines

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
		(4.6) Make the draft Operational Guidelines required by commitments 4.1 to 4.5 available for a four week limited stakeholder review to the: <ul style="list-style-type: none"> IWDF Community Liaison Committee; The Chamber of Minerals and Energy of Western Australia; and Chamber of Commerce and Industry of Western Australia; prior to the Environmental Protection Authority finalising its consideration of the Plan.	To obtain stakeholder input to the Operational Guidelines.	Prior to the next disposal operation.	Environmental Protection Authority	Radio-logical Council (WA)	Approved Operational Guidelines
		(4.7) Advertise and make the approved Operational Guidelines required by commitments 4.1 to 4.5 publicly available.	To inform the community.	Prior to the next disposal operation.	Environmental Protection Authority		Performance and Compliance Report
		(4.8) Implement the Operational Guidelines required by commitments 4.1 to 4.5.	To ensure that requirements specified in the approved Operational Guidelines are adhered to.	Prior to the next disposal operation.	Environmental Protection Authority		Performance and Compliance Report
5	<u>Operational Procedures</u> Environmental, Radiation, Health and Safety	(5.1) Prepare the Environmental, Radiation, Health and Safety Operational Procedures in accordance with the Operational Guidelines.	To ensure that risk to the community, waste owners, contractors, employees, personnel and members of the emergency response services, and the environment is minimised.	Prior to each disposal operation.	Environmental Protection Authority	Radio-logical Council (WA)	Approved Operational Procedures

No.	TOPIC	ACTION	OBJECTIVES/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
	Transport	<p>(5.2) Prepare the Transport Operational Procedures in accordance with the Operational Guidelines to include but not limited to:</p> <ul style="list-style-type: none"> • details of waste loading and transport activities, and emergency response training for personnel; • identification of responsibility for the various aspects of transport, loading and unloading operations; • contingency plans for dealing with fire safety, accidents, spillages, vehicle breakdowns and other incidents should they occur; and • the procedure for liaison with the local community and emergency services. <p>(The Operational Procedures documents referred to in commitments 5.1 and 5.2 will be the detailed working documents specific to each waste disposal operation).</p>	To achieve environmental outcomes required by the Environmental Management Program in the conduct of a particular waste disposal operation (see commitment 2).	Prior to each disposal operation	Environmental Protection Authority		Performance and Compliance Report
		(5.3) Advertise and make the approved Operational Procedures required by commitments 5.1 and 5.2 publicly available.	To inform the community.	Prior to each disposal operation.	Environmental Protection Authority		Performance and Compliance Report

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA
		(5.4) Implement the Operational Procedures required by commitments 5.1 and 5.2.	To minimise the possibility of a waste disposal operation adversely affecting the environment.	During each particular waste disposal operation.	Environmental Protection Authority (Should any incident occur during each particular waste disposal operation it is to be reported immediately to the EPA)		Performance and Compliance Report
6	<u>Performance and Compliance Report</u>	(6.1) Prepare the Performance and Compliance Report at the conclusion of each waste disposal operation.	To outline the project outcomes and the environmental monitoring, and discuss adverse environmental impacts, if any and how these environmental impacts have been or will be managed. The process will provide feedback for continuous improvement to the Environmental Management Program.	Within three months following completion of each specific waste disposal operation.	Environmental Protection Authority	Radio-logical Council (WA) in relation to radiation issues	Approved Performance and Compliance Report
		(6.2) Advertise and make the approved Performance and Compliance Report required by commitment 6.1 publicly available.	To inform the public.	Within 4 weeks of obtaining approval for the Performance and Compliance Report.	Environmental Protection Authority		Approved Performance and Compliance Report
7	<u>Waste</u>	(7.1) Limit disposal of waste at the Intractable Waste Disposal Facility to waste generated in Western Australia (see commitment 4.1).	To comply with State Government requirements.	Prior to each disposal operation.	Environmental Protection Authority		Environmental, Radiation, Health and Safety Operational Procedures

No.	TOPIC	ACTION	OBJECTIVE/S	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT/ COMPLIANCE CRITERIA
		(7.2) Ensure that approval to dispose of any specific waste is conditional on a review of currently practicably available waste treatment, disposal or management alternatives in Australia (see commitment 4.1).	To ensure that only wastes for which there is no currently practicably available destruction, disposal or management technologies in Australia are disposed of at the site and to maintain the site as a facility of last resort.	Prior to each disposal operation.	Environmental Protection Authority		Environmental, Radiation, Health and Safety Operational Procedures
		(7.3) Prepare a waste register data base to be maintained, updated and made publicly available at the office of the proponent or on the World Wide Web.	To show the method of disposal, source, type, quantity and location of all waste disposed of at the Intractable Waste Disposal Facility to enable future land users to take account of the deposited wastes and protect future users from adverse impacts on health and amenity.	Prepare the waste register data base within six months of the issuing of the Minister's Statement that the proposal may be implemented and update the register within three months of completion of each disposal operation.	Environmental Protection Authority		Performance and Compliance Report
8	Community Liaison	Convening a minimum of four meetings a year of the Community Liaison Committee.	To ensure that the community remains informed of activities at the Intractable Waste Disposal Facility.	Following the Minister's Statement that the proposal may be implemented.	Environmental Protection Authority		Performance and Compliance Report
9	Fencing and Signposting	Fence and signpost each discrete disposal cell.	To discourage access by: <ul style="list-style-type: none"> • fauna; • unauthorised personnel; and • the public. 	Prior to demobilisation of each waste disposal operation following the Minister's Statement that the proposal may be implemented.	Environmental Protection Authority		Performance and Compliance Report

No.	TOPIC	ACTION	OBJECTIVES	TIMING	TO REQUIREMENTS OF	ADVICE	MEASUREMENT / COMPLIANCE CRITERIA
10	Water	Demonstrate that there are at least 5 metres of clay between the base of any disposal cell and bedrock.	To allow for the possible establishment of a groundwater table in the future without impinging upon the disposal cells.	Prior to each disposal operation.	Environmental Protection Authority		Performance and Compliance Report
11	Transport and Packaging	Where transport and packaging is to be undertaken by a party other than the proponent, the proponent will ensure that the packaging and transport requirements specified in the Operational Transport Guidelines and Waste Acceptance Guidelines are adhered to through the use of contracts and other controls as necessary (see commitments 4.1 and 4.4).	To ensure that risk to the community, waste owners, contractors, employees, personnel and members of the emergency response services, property and the environment is minimised.	Prior to the commencement of transportation activities during each disposal operation.	Environmental Protection Authority		Approved operational Transport Procedures
12	Decommissioning and Rehabilitation	Implement the requirements of the Decommissioning and Rehabilitation Management Plan until the Minister for the Environment determines that decommissioning and/or rehabilitation is/are complete.	To ensure that the proposal is decommissioned and rehabilitated according to the requirements specified in the approved Decommissioning and Rehabilitation Management Plan (refer commitment 3).	During decommissioning and/or rehabilitation.	Minister for the Environment		Determination by the Minister for the Environment that decommissioning and/or rehabilitation is/are complete.

APPENDIX B

RCWA Registration

RADIATION SAFETY ACT 1975
CERTIFICATE OF REGISTRATION* OF PREMISES
in which
RADIOACTIVE SUBSTANCES
are to be used, stored or manufactured

It is hereby certified that the premises referred to in this certificate have been registered under the Radiation Safety Act 1975 for the radioactive substances and purpose(s) specified below. The registration* is subject to all applicable regulations under the Act and to any conditions, restrictions or limitations that are specified below or in any attachments.

1. **Name and address of the registrant**
MS EMMA SAVAGE-JONES
DIRECTOR, BUILDING MANAGEMENT
DEPARTMENT OF FINANCE
LOCKED BAG 44
CLOISTERS SQUARE W A 6850

DEPARTMENT OF FINANCE
RECORDS

24 FEB 2020

2. **Location of premises subject to registration***
IWDF, MT WALTON EAST, CROWN RESERVE 42001, ~100 KM NORTH OF GT EASTERN HWY BOORABBIN W A 6429

3. **Particulars of the radioactive substances to be used, stored, manufactured or otherwise dealt with on the premises**
(See Note a). These particulars, where applicable, are given on attached supplementary sheet(s)

4. **Approved radiation safety officer(s).** (The registrant must appoint the person(s) named below in writing and inform them in writing of their duties and responsibilities. See also Note b).
PARR MR STUART RADIOACTIVE SUBSTANCES -

5. **Conditions, restrictions or limitations** (See Note c) Cond 114
SEE ATTACHED CONDITIONS

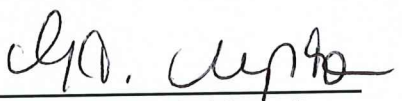
6. **Purpose(s) applied to the registration***
DISPOSAL OF RADIOACTIVE WASTE - INTRACTABLE WASTE DISPOSAL FACILITY (IWDF), MT WALTON EAST

Notes

- a) **Prior notice in writing** must be given to the Radiological Council of material changes. This includes changes affecting the type, form, maximum activity, use or purpose of the radioactive substances as well as any proposed changes to the structure, ventilation or drainage which may differ from information previously supplied and on which approval for this registration may be based. Failure to provide proper notification is an offence under section 38 of the Act.
- b) Although the radiation safety officer has specified duties in the regulations, the registrant is responsible for ensuring that those duties are performed and that the use, storage or manufacture of the radioactive substances complies with the Act and regulations. Failure to do so is an offence.
- c) **The registrant must ensure compliance** with any conditions imposed on this registration under section 36 of the Act. A requirement may be imposed for the **conditions to be displayed** in a location accessible to all radiation workers.

10 FEB 2020

Date


Secretary, Radiological Council

This Certificate is not valid until signed by the Secretary of the Radiological Council.

REGISTRATION* NO: RS 13/2011 20590

EXPIRY DATE: 08 Feb 2023

RADIATION SAFETY ACT**CONDITIONS, RESTRICTIONS AND LIMITATIONS (SECTION 36)****DISPOSAL OF RADIOACTIVE WASTE AT THE
INTRACTABLE WASTE DISPOSAL FACILITY (IWDF), CROWN RESERVE 42001**

1. This Registration is for the disposal of radioactive waste at the Intractable Waste Disposal Facility (IWDF), Crown Reserve 42001 in accordance with the *Radiation Safety Act 1975 (Section 28)*.
2. The Registrant is directed to ensure that –
 - 2.1 prior to radioactive waste being accepted for final disposal at the IWDF, a disposal permit must be granted by the Radiological Council in accordance with *Section 34 of the Act*;
 - 2.2 disposals are undertaken in accordance with the *Radiation Safety (General) Regulations (1983)* and *Regulation 31(A) Near-surface disposal of radioactive waste*, as amended;
 - 2.3 radiation safety management is undertaken by the appointed *Radiation Safety Officer (RSO)*, in accordance with his duties under *Regulations 19(3)*;
 - 2.4 all radioactive waste to be disposed of at the IWDF shall be conditioned in accordance with the *Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)*, *Radiation Health Series No. 35*, *National Health and Medical Research Council of Australia 1992*;
 - 2.5 all radioactive waste to be packaged and transported to the IWDF shall be in accordance with the *Radiation Safety (Transport of Radioactive Substances) Regulations 2002* and the *Code of Practice for the Safe Transport of Radioactive Material (2008)* as adopted;
 - 2.6 the *Radiation Safety Officer (RSO)* reports periodically in writing to the Radiological Council, the results of radiation monitoring and other factors relating to human health for the receipt, handling and near-surface disposal of the radioactive waste; and if there are any changes to the radiation safety management procedures for the IWDF;
 - 2.7 accurate records of all radioactive material disposed of at the IWDF shall be maintained and archived in an approved manner, and reported to the Radiological Council, including an updated report after each disposal campaign;

2.8 where appropriate, radiation safety is managed in accordance with the following IWDF guidelines, procedures and instructions –

- 2.8.1 *Disposal of Radioactive Waste at the Intractable Waste Disposal Facility (IWDF), Mt Walton East, Waste Acceptance Guideline and Waste Acceptance Proforma, Government of Western Australia Department of Finance Building Management and Works, as amended;*
- 2.8.2 *IWDF Radiation Procedure RP-01, Radiation Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;*
- 2.8.3 *IWDF Operational Procedure OP-04, Waste Preparation for Disposal, Government of Western Australia Department of Finance Building Management and Works, as amended;*
- 2.8.4 *IWDF Operational Procedure OP-05, Waste Loading and Transport, Government of Western Australia Department of Finance Building Management and Works, as amended;*
- 2.8.5 *IWDF Operational Procedure OP-06, Waste Delivery, Acceptance and Disposal, Department of Finance, Building Management and Works, as amended;*
- 2.8.6 *IWDF Operational Procedure OP-10, Operation Site Safety Management, Government of Western Australia, Department of Finance, Building Management and Works, as amended;*
- 2.8.7 *IWDF Operational Instruction OI-01, Waste Inspection, Government of Western Australia Department of Finance Building Management and Works, as amended.*

CONDITION NO: 114
CERTIFICATE NO: RS 13/2011 20590
EXPIRES ON: 08 February 2023

RADIATION SAFETY ACT

CONDITIONS, RESTRICTIONS AND LIMITATIONS (SECTION 36)

SPECIAL CONDITIONS

- 1. Inventory locations of material at Intractable Waste Disposal Facility (IWDF), Mt Walton East, are outlined as follows -**
 - 92RS01: Final report on disposal of low level radioactive waste at the IWDF east of Mt Walton. Environmental Health Branch**
 - 92RS02: Disposal of second batch of radioactive waste at the IWDF, Mt Walton. Katee Enterprises, July 1994**
 - 94RT01: Radiological aspects of the acceptance and burial of CSBP & Farmers Ltd radioactive waste at Mt Walton East. Katee Enterprises, July 1994**
 - 2000RT01: 1999 Annual Radiation Report: Operations of the IWDF Mt Walton East. WM(WA), June 2000**
 - 2002RT01: 2002 Annual Radiation Report: Operations of the IWDF Mt Walton East. WM(WA)**
 - Report EP2008-154: Performance and Compliance Report: Intractable Waste Disposal Facility Mt Walton East, Coffey Environments, December 2008**

- 2. The full inventory of items buried at the IWDF is to be available on a database maintained by the Registrant.**

CERTIFICATE NO:

RS 13/2011 20590

EXPIRES ON:

08 February 2023

APPENDIX C

Department of Environment Regulation Licence



LICENCE FOR PRESCRIBED PREMISES

Environmental Protection Act 1986, Part V

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

LICENSEE AND OCCUPIER

Department of Finance
Building Management and Works
Optima Centre, 16 Parkland Road
OSBORNE PARK WA 6017

ABN: 995 933 47728

PREMISES

Intractable Waste Disposal Facility Mt Walton East
Crown Reserve No. 42001, approximately 100 km north of Great Eastern Highway
BOORABBIN, WA, 6429
(as depicted in attachment 1)

PRESCRIBED PREMISES CATEGORY

Schedule 1 of the *Environmental Protection Regulations 1987*

CATEGORY	DESCRIPTION	CAPACITY
66	Class V intractable landfill site.	Not applicable

CONDITIONS OF LICENCE

Subject to the conditions of licence set out in the attached pages.

Date signed: 11 February 2016

Steve Checker
MANAGER LICENSING (WASTE INDUSTRIES)
Officer delegated under Section 20
of the *Environmental Protection Act 1986*

ISSUE DATE Thursday, 14 February 2008
COMMENCEMENT DATE Monday, 18 February 2008
EXPIRY DATE Friday, 17 February 2017
AMENDMENT DATE Thursday, 11 February 2016

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

DEFINITIONS

'CEO' means Chief Executive Officer of the Department of Environment Regulation;

'CEO' for the purpose of correspondence means;

Chief Executive Officer
Department Administering the Environmental Protection Act 1986
Locked Bag 33
CLOISTERS SQUARE WA 6850
Email: info@der.wa.gov.au

REPORTING CONDITIONS

- 1 The licensee shall by **1 March** in each year, provide to the CEO an Annual Audit Compliance Report in the form in Attachment 3 to this licence, signed and certified in the manner required by Section C of the form, indicating the extent to which the licensee has complied with the conditions of this licence, and any previous licence issued under Part V of the Act for the premises, during the period beginning 1 February the previous year and ending on 31 January in that year.

NOTIFICATION OF INTENTION TO DISPOSE

- 2 The licensee shall notify the CEO in writing at least 3 months prior to the delivery of waste to the Intractable Waste Disposal Facility Mt Walton East.

CONDITIONS OF LICENCE

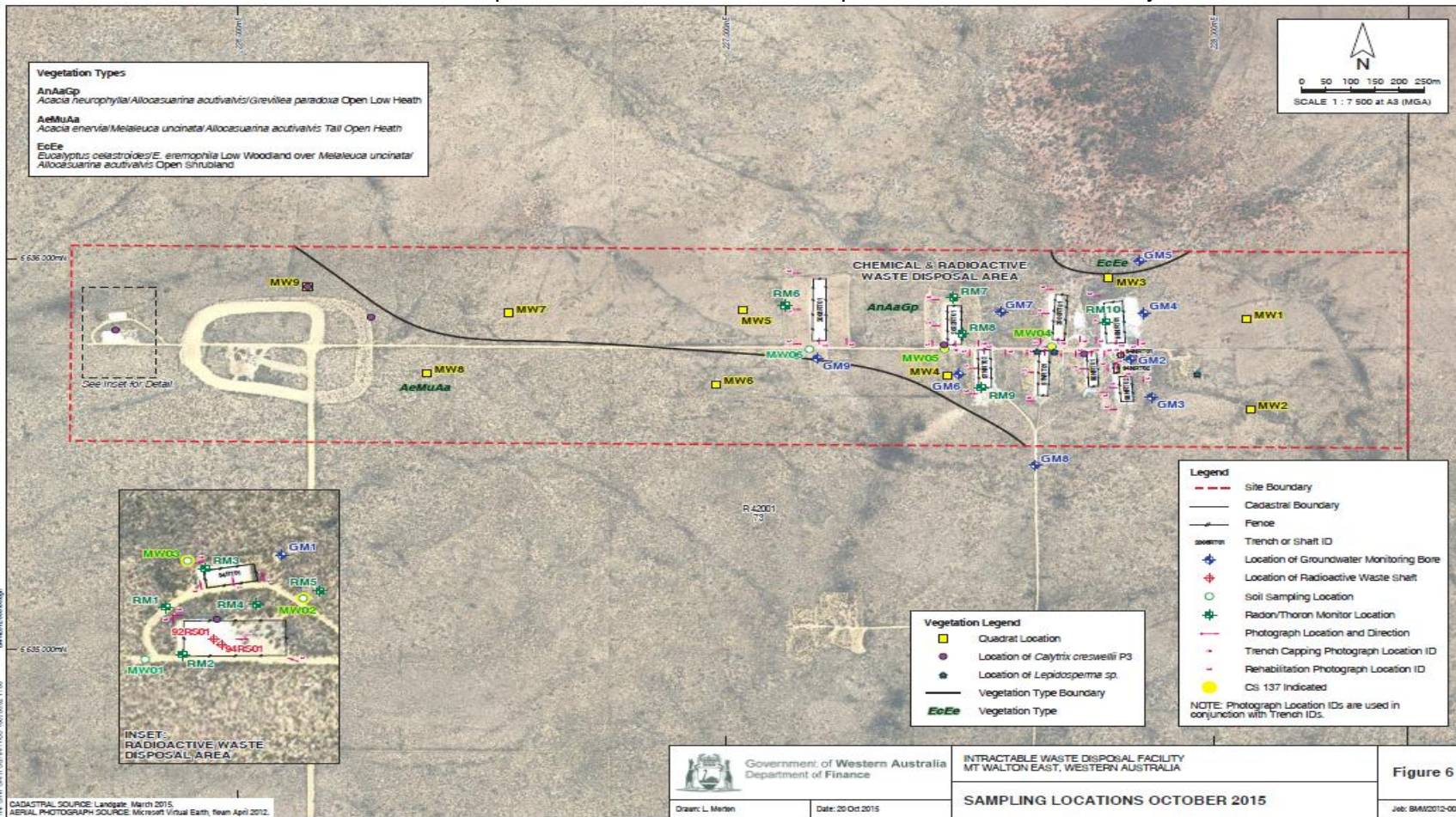
Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

Attachment 1 – Premises map

The Premises is shown in the map below. The red dotted line depicts the Premises boundary.



ISSUE DATE Thursday, 14 February 2008

Page 3 of 7

AMENDMENT DATE Thursday, 11 February 2016

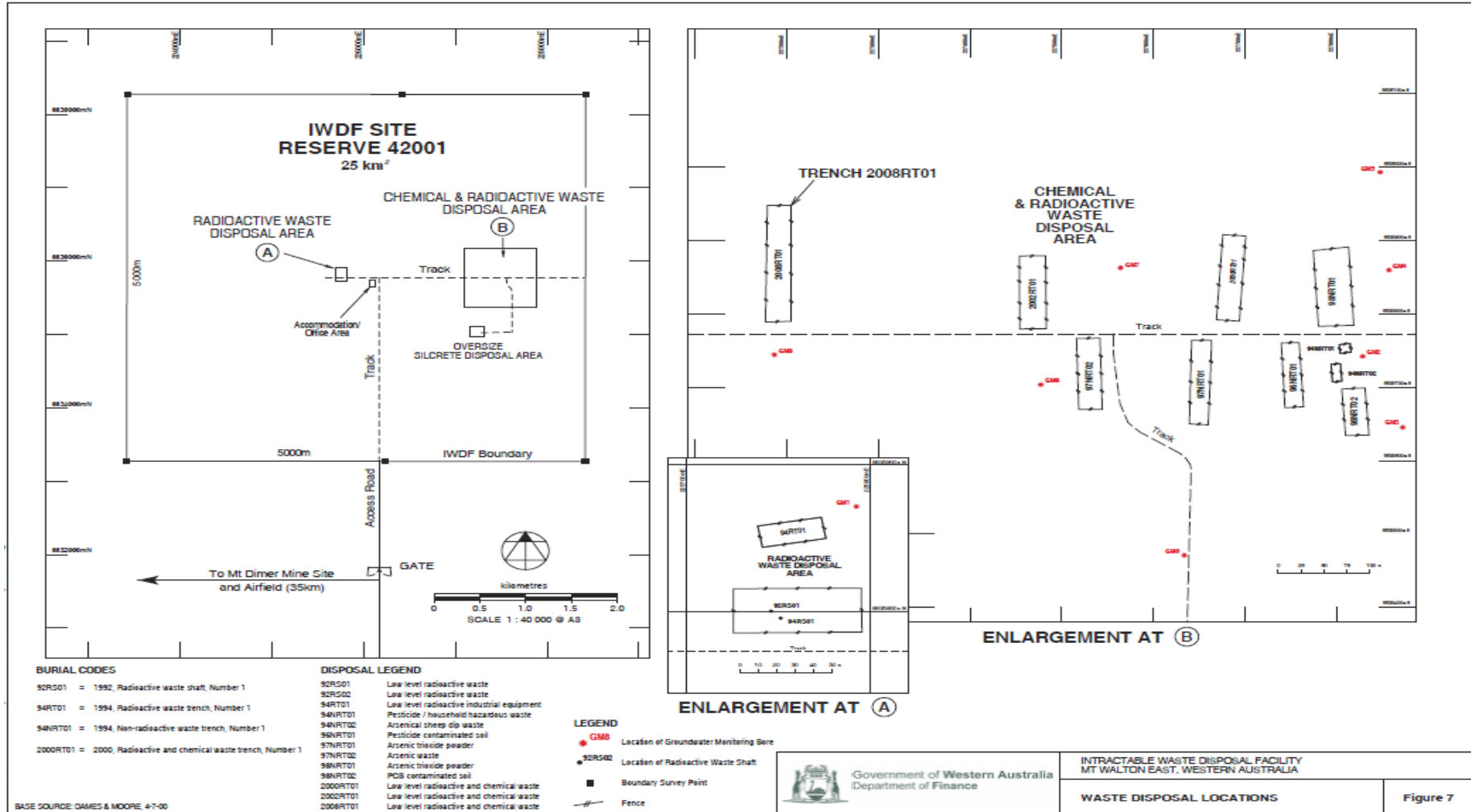
CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

Attachment 2 – Waste disposal locations



ISSUE DATE

Thursday, 14 February 2008

Page 4 of 7

AMENDMENT DATE

Thursday, 11 February 2016

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

ATTACHMENT 3: Reporting & notification forms

These forms are provided for the proponent to report monitoring and other data required by the Licence. They can be requested in an electronic format.

SECTION A - LICENCE DETAILS

Licence Number:	Licence File Number:
Company Name: Department of Finance	ABN: 995 933 47728
Trading as:	
Reporting period: _____ to _____	

STATEMENT OF COMPLIANCE WITH LICENCE CONDITIONS

1. Were all conditions of licence complied with within the reporting period? (please tick the appropriate box)
- Yes Please proceed to Section C
No Please proceed to Section B

Each page must be initialed by the person(s) who signs Section C of this annual audit compliance report

INITIAL: _____

ISSUE DATE

Thursday, 14 February 2008

Page 5 of 7

AMENDMENT DATE

Thursday, 11 February 2016

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

SECTION B - DETAILS OF NON-COMPLIANCE WITH LICENCE CONDITION.

Please use a separate page for each licence condition that was not complied with.

a) Licence condition not complied with?	
b) Date(s) when the non-compliance occurred, if applicable?	
c) Was this non-compliance reported to DER?	
<input type="checkbox"/> Yes	<input type="checkbox"/> Reported to DER verbally Date _____
	<input type="checkbox"/> No
	<input type="checkbox"/> Reported to DER in writing Date _____
d) Has DER taken, or finalised any action in relation to the non-compliance?	
e) Summary of particulars of non-compliance, and what was the environmental impact?	
f) If relevant, the precise location where the non-compliance occurred (attach map or diagram)	
g) Cause of non-compliance	
h) Action taken or that will be taken to mitigate any adverse effects of the non-compliance	
i) Action taken or that will be taken to prevent recurrence of the non-compliance	

Each page must be initialed by the person(s) who signs Section C of this annual audit compliance report

INITIAL: _____

ISSUE DATE

Thursday, 14 February 2008

Page 6 of 7

AMENDMENT DATE

Thursday, 11 February 2016

CONDITIONS OF LICENCE

Environmental Protection Act 1986

LICENCE NUMBER L8190/2007/1

FILE NUMBER 2012/006884

SECTION C - SIGNATURE AND CERTIFICATION

This Annual Audit Compliance Report (AACR) may only be signed by a person(s) with legal authority to sign it. The ways in which the AACR must be signed and certified, and the people who may sign the statement, are set out below.

Please tick the box next to the category that describes how this AACR is being signed. If you are uncertain about who is entitled to sign or which category to tick, please contact the licensing officer for your premises.

If the licence holder is	The Annual Audit Compliance Report must be signed and certified:
an individual	<input type="checkbox"/> by the individual licence holder, or <input type="checkbox"/> by a person approved in writing by the Chief Executive Officer of the Department of Environment Regulation to sign on the licensee's behalf.
A firm or other unincorporated company	<input type="checkbox"/> by the principal executive officer of the licensee; or <input type="checkbox"/> by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A corporation	<input type="checkbox"/> by affixing the common seal of the licensee in accordance with the Corporations Act 2001; or <input type="checkbox"/> by two directors of the licensee; or <input type="checkbox"/> by a director and a company secretary of the licensee, or <input type="checkbox"/> if the licensee is a proprietary company that has a sole director who is also the sole company secretary – by that director, or <input type="checkbox"/> by the principal executive officer of the licensee; or <input type="checkbox"/> by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
A public authority (other than a local government)	<input type="checkbox"/> by the principal executive officer of the licensee; or <input type="checkbox"/> by a person with authority to sign on the licensee's behalf who is approved in writing by the Chief Executive Officer of the Department of Environment Regulation.
a local government	<input type="checkbox"/> by the chief executive officer of the licensee; or <input type="checkbox"/> by affixing the seal of the local government.

It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular. There is a maximum penalty of \$50,000 for an individual or body corporate.

I/We declare that the information in this annual audit compliance report is correct and not false or misleading in a material particular.

SIGNATURE: _____

SIGNATURE: _____

NAME: (printed) _____

NAME: (printed) _____

POSITION: _____

POSITION: _____

DATE: ____/____/____

DATE: ____/____/____

SEAL (if signing under seal)



Decision Document

Environmental Protection Act 1986, Part V

Proponent: Department of Finance

Licence: L8190/2007/1

Registered office: Department of Finance
Building Management and Works
Optima Centre, 16 Parkland Road
OSBORNE PARK WA 6017

Premises address: Intractable Waste Disposal Facility Mt Walton East
Portion of Reserve No. 42001, approximately 100 km north of Great Eastern
Highway
BOORABBIN, WA, 6429

Issue date: Thursday, 14 February 2008

Commencement date: Monday, 18 February 2008

Expiry date: Friday, 17 February 2017

Decision

Based on the assessment detailed in this document, the Department of Environment Regulation (DER), has decided to issue an amended licence. DER considers that in reaching this decision, it has taken into account all relevant considerations.

Decision Document prepared by: Abnesh Chetty
Licensing Officer

Decision Document authorised by: Steve Checker
Delegated Officer



Contents

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Contents	2
1 Purpose of this Document	2
2 Administrative summary	3
3 Executive summary of proposal and assessment	4
4 Decision table	5
5 Advertisement and consultation table	6
6 Risk Assessment	7

1 Purpose of this Document

This decision document explains how DER has assessed and determined the application for a works approval or licence, and provides a record of DER's decision-making process and how relevant factors have been taken into account. Stakeholders should note that this document is limited to DER's assessment and decision making under Part V of the *Environmental Protection Act 1986*. Other approvals may be required for the proposal, and it is the proponent's responsibility to ensure they have all relevant approvals for their Premises.



2 Administrative summary

Administrative details		
Application type	Works Approval <input type="checkbox"/>	<input type="checkbox"/>
	New Licence <input type="checkbox"/>	<input type="checkbox"/>
	Licence amendment <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Works Approval amendment <input type="checkbox"/>	<input type="checkbox"/>
Activities that cause the premises to become prescribed premises	Category number(s)	Assessed design capacity
	66	Not applicable
Application verified	Date: N/A	
Application fee paid	Date: N/A	
Works Approval has been complied with	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Compliance Certificate received	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
Commercial-in-confidence claim	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Commercial-in-confidence claim outcome	N/A	
Is the proposal a Major Resource Project?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Was the proposal referred to the Environmental Protection Authority (EPA) under Part IV of the <i>Environmental Protection Act 1986</i> ?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Is the proposal subject to Ministerial Conditions?	Yes <input checked="" type="checkbox"/>	Referral decision No: Managed under Part V <input type="checkbox"/>
		Assessed under Part IV <input type="checkbox"/>
Does the proposal involve a discharge of waste into a designated area (as defined in section 57 of the <i>Environmental Protection Act 1986</i>)?	Yes <input type="checkbox"/>	Ministerial statement No:562
		EPA Report No:
Is the Premises within an Environmental Protection Policy (EPP) Area	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
		If Yes include details of which EPP(s) here.
Is the Premises subject to any EPP requirements?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
		If Yes, include details here, eg Site is subject to SO ₂ requirements of Kwinana EPP.



3 Executive summary of proposal and assessment

The IWDF was established to take waste that is a management problem due to its toxicity or physical or chemicals properties that make it difficult to dispose of or to treat safely and is not suitable for disposal into a Class I, II, III or IV category of landfill. Examples of these wastes are:

- Radioactive wastes (approved by the Radiological Council of Western Australia);
- Significantly contaminated soils, industrial sludge (with any free liquid removed prior to transport), some spent catalyst wastes.

DoF operates the IWDF on a cost recovery basis, providing the only such disposal site in Western Australia. Use of the site has been very infrequent, with the most recent disposal of waste being in 2008.

DER is amending the current Licence (L8190/2007/1) to extend the expiry date by 12 months to 17 February 2016. This will allow for a full review of the Licence in accordance with DER's current licensing practices which was not able to be achieved under the previous expiry date due to time constraints. Administrative changes have been incorporated in accordance with DER protocol.

The IWDF risk rating will remain as Medium until a full review of the site's operations has been carried out.



4 Decision table

All applications are assessed in line with the *Environmental Protection Act 1986*, the *Environmental Protection Regulations 1987* and DER's Operational Procedure on Assessing Emissions and Discharges from Prescribed Premises. Where other references have been used in making the decision they are detailed in the decision document.

Based on the information available to DER at the time of the renewal, DER is not aware of any changes at the premises that would alter the risk profile for emissions and discharges since the previous licence was granted.

DECISION TABLE				
Works Approval / Licence section	Condition number W = Works Approval L = Licence	OSC or NSC	Justification (including risk description & decision methodology where relevant)	Reference documents
Licence Duration	N/A	N/A	DER will amend the current Licence and extend the duration of the Licence for 12 months to allow for a fully review of the sites Licence to be carried out. DER will consider the duration of any future licence issues based on the outcomes of the review. Administrative changes have also been incorporated in accordance with DER protocol.	



5 Advertisement and consultation table

Date	Event	Comments received/Notes	How comments were taken into consideration
4/02/2016	Proponent sent a copy of draft instrument	Confirmation and acceptance of the draft amended instrument was provided on 10 February 2016.	Finalisation of instrument



6 Risk Assessment

Note: This matrix is taken from the DER Corporate Policy Statement No. 07 - Operational Risk Management

Table 1: Emissions Risk Matrix

Likelihood	Consequence				
	Insignificant	Minor	Moderate	Major	Severe
Almost Certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High

**NOTICE OF AMENDMENT OF LICENCE EXPIRY DATES
SECTION 59B(9) AND SECTION 59(1)(k) ENVIRONMENTAL PROTECTION ACT 1986
LICENCED PRESCRIBED PREMISES**

Section 63 of the *Environmental Protection Act 1986* prescribes that a licence shall continue in force for such period as is specified in the licence. The Department of Environment Regulation's (DER) Guidance Statement on Licence Duration provides for the granting of licences for up to 20 years duration.

In accordance with section 59(1)(k) of the *Environmental Protection Act 1986*, the CEO may amend the duration of a licence. Having had regard to the Guidance Statement on Licence Duration, the Chief Executive Officer (CEO) has determined that the licence expiry dates for almost all of the licensed prescribed premises are to be amended. The following matters have been considered:

- confirmations which have been received from licensees and local government authorities have been considered to ensure that amended expiry dates do not exceed the duration of any relevant planning approvals and mining tenements;
- risk-based reviews for the assessment of licenced prescribed premises will be undertaken in accordance with DER's regulatory framework;
- licenced prescribed premises will be subject to ongoing compliance inspections and investigations following incidences and complaints, in accordance with the EP Act;
- in the event that risk issues arise in relation to licenced prescribed premises, the CEO may, depending on the circumstances:
 - amend the conditions of licenced prescribed premises at any time;
 - in the event of an alleged offence, exercise enforcement powers under the EP Act, including an environmental protection notice; and
 - in the event of breach of licence conditions, revoke the licence;
- to ensure the efficient operation of the licensing regime, the regulatory burden of frequent renewals in the absence of full assessment has been removed; and
- the extension of expiry dates will enable both DER and affected licensees to undertake an ordered and structured implementation of DER's risk-based regulatory framework to existing premises.

Notice of Amendments

This notice is given in accordance with section 59B(9) of the *Environmental Protection Act 1986* that the following licences are hereby amended to have the new expiry date in accordance with the schedule set out below. These amendments are effective as of 29 April 2016.

Jason Banks

DIRECTOR GENERAL
DEPARTMENT OF ENVIRONMENT REGULATION

29 April 2016

SCHEDULE OF LICENCE PREMISES EXPIRY DATE AMENDMENTS

LICENCE	OCCUPIER NAME	PREMISES NAME	COMMENCEMENT DATE	PREVIOUS EXPIRY DATE	NEW EXPIRY DATE
L8171/2007/2	Daromi Pty Ltd	RMD Tankers	30 August 2012	29 August 2017	29 August 2027
L8173/2007/2	Poseidon Nickel Limited	Windarra Nickel Project	22 October 2013	21 October 2018	21 October 2027
L8174/2007/5	Alcoa of Australia Ltd	Wagerup Cogeneration Plant	29 November 2014	28 November 2016	28 November 2034
L8176/2007/2	Holcim (Australia) Pty Limited	Baldivis Sand Quarry	4 March 2011	2 June 2016	3 March 2029
L8177/2007/2	Downer EDi Works Pty Ltd	Downer EDi Works Pty Ltd - Narngulu Asphalt Plant	8 October 2012	7 October 2017	7 October 2022
L8190/2007/1	Department of Finance	Mt Walton Intractable Waste Disposal Facility (IWDF) Class V Landfill	18 February 2008	17 February 2017	17 February 2022
L8193/2007/3	Talisman Nickel Pty Ltd	Sinclair Nickel Project	20 October 2014	19 October 2019	19 October 2026
L8194/2007/3	Fortescue Metals Group Limited	Anderson Point Materials Handling Facility	24 April 2014	23 April 2017	23 April 2027
L8199/2007/2	Chichester Metals Pty Ltd	Cloudbreak Iron Ore Mine	4 February 2012	3 February 2026	3 February 2032
L8202/2007/2	Water Corporation	Cunderdin Wastewater Treatment Plant	16 July 2014	15 July 2019	15 July 2032
L8222/2008/2	Naturaliste Vintners Pty Ltd	Naturaliste Vintners Winery	28 September 2014	27 September 2016	27 September 2036
L8225/2008/2	Main Roads Western Australia	Asphalt Manufacturing Derby	2 June 2013	1 June 2018	1 June 2034
L8232/2008/2	Pilbara Iron Company (Services) Pty Ltd	Brockman 4 Mine	31 July 2013	30 July 2018	30 July 2029
L8234/2008/2	Robe River Mining Co Pty Ltd	Mesa A Warramboe Iron Ore Mine	31 July 2013	30 July 2018	30 July 2033
L8235/2008/2	Ian & Jemima Minty	Narrabie Farm	8 July 2013	7 July 2018	7 July 2030
L8237/2008/2	Water Corporation	Corrigin Wastewater Treatment Plant	10 December 2014	9 December 2019	9 December 2023
L8238/2008/2	Water Corporation	Quairading Wastewater Treatment Plant	5 December 2014	4 December 2019	4 December 2029
L8239/2008/2	Water Corporation	York Wastewater Treatment Plant	22 April 2015	21 April 2020	21 April 2028
L8240/2008/2	Water Corporation	Narembeen Wastewater Treatment Plant	20 May 2015	19 May 2020	19 May 2033
L8241/2008/2	Mr Ambrose James Smith & Mrs Shiralee Smith	WA Tyre Recovery - Albany Storage	29 May 2013	28 May 2018	28 May 2028
L8242/2008/4	AnaeCo Limited	AnaeCo Limited	22 January 2014	21 January 2017	21 January 2023
L8245/2008/2	Water Corporation	Narngulu Wastewater Treatment Plant	6 October 2013	5 October 2018	5 October 2024
L8246/2008/2	Romine Holdings Pty Ltd f/t Wren Family Trust	Wren Oil Midvale Depot	4 August 2013	3 August 2018	3 August 2031
L8247/2008/2	IPM Operation & Maintenance Kwinana Pty Ltd	Kwinana Cogeneration Plant	3 July 2013	2 July 2018	2 July 2034
L8249/2008/2	Focus Operations Pty Ltd	Three Mile Hill Mine Site	29 September 2013	28 September 2018	28 September 2022

APPENDIX D

ASNO Permit PN207



PERMIT TO POSSESS NUCLEAR MATERIAL

This Permit granted pursuant to Section 13 of the *Nuclear Non-Proliferation (Safeguards) Act 1987* ("the Act") authorises the Permit Holder to possess the *nuclear material* designated in Part 1, subject to *the Act* and any orders, directions or regulations made thereunder and to the restrictions and conditions set out in Parts 1, 2 and 3 hereunder. Under section 21 of *the Act*, this Permit does not make it lawful for the Permit Holder to do any act or thing that, apart from *the Act*, is unlawful under another law of the Commonwealth or under a law of a State or Territory.

In this Permit, unless the contrary intention appears, words and phrases have the same meaning as in *the Act*. Terms in italics have specialised meanings, which are defined in Section 5 of the Class L2 *Compliance Code*.

The *Compliance Code* is an integral part of this Permit.

PART 1

1.	NAME	Minister for Works C/- Department of Finance (Western Australia)		
	ABN/ACN	99 593 347 728		
2.	ADDRESS			
	2.1. Physical Address	Department of Finance, Optima Centre 16 Parkland Road, OSBORNE PARK WA 6017		
	2.2. Postal Address	Department of Finance Locked Bag 44, CLOISTERS SQUARE WA 6850		
3.	PERMIT NUMBER	PN207	Version	3
			Class	L2
4.	DATES OF EFFECT			
	4.1. Commencement Date	30 October 2020		
	4.2. Expiration Date	30 November 2024		

5.	Chemical and isotopic composition and physical form of <i>nuclear material</i> in relation to which this Permit has effect ("the nuclear material")	6.	Maximum amount that the Permit Holder may possess at any one time under this Permit
	Source Material		Element Weight
5.1	Depleted uranium in any form	6.1	500 kilograms
5.2	Natural uranium in any form	6.2	500 kilograms
5.3	Thorium in any form	6.3	500 kilograms
	Special Fissionable Material		Isotope Weight
5.4	Uranium-235 (as enriched U) in any form	6.4	5 grams
5.5	Uranium-233 in any form	6.5	5 grams
5.6	Plutonium-239 in any form	6.6	5 grams



7. Permit History

Version	Date of Effect	Description
1	21/11/2011	Permit original issue
2	28/09/2018	Variation—Issue of permit using Class L2 template
3	30/10/2020	This Variation – Extension to permit and minor language updates to paragraphs 8 to 13 and Compliance Code sections 1, 3 and 4. Definitions updated and moved to Compliance Code.

This Variation of the Permit is issued on the 19th of October 2020.

John Kalish
Acting Director General
ASNO

**8. Authorised Use**

8.1. Storage.

9. Locations for Which This Permit has Effect ("Approved Locations")

9.1. Storage at:

- a) Intractable Waste Disposal Facility (IWDF), Mt Walton East, Crown Reserve 42001, Western Australia, (GPS coordinates at centre point Lat -30 22' 43" Long 120 8' 46"); and
- b) any other location/s as approved by the *Director General*.

10. Transport for Which This Permit has Effect

This Permit grants the Permit Holder permission to transport *nuclear material* to anywhere within Australia for amounts up to those specified in paragraphs 5 and 6.



PART 2

11. Communications with the Director General

11.1. The Permit Holder or *Designated Individual* shall submit all applications, notifications and reports to the *Director General* via the following means:

- ASNO's NUMBAT online database portal: (<https://numbat.dfat.gov.au>);
- EMAIL: nuclear.asno@dfat.gov.au;
- Australian Safeguards and Non-Proliferation Office
RG Casey Building
John McEwen Crescent
Barton, ACT 0221; or
- as otherwise specified in writing by the *Director General*.

NOTE: A reference to the Director General in relation to applications, approvals, notification or reports under this Permit or its Compliance Code includes the Director General and ASNO inspectors.

12. Principles

The Permit Holder shall:

- 12.1. implement the requirements of the *Compliance Code*;
- 12.2. not commence any activity for which approval of the *Director General* is required, prior to the receipt of written approval from the *Director General*;
- 12.3. carry out such activity in accordance with any requirements specified by the *Director General* in such approval;
- 12.4. not transfer *nuclear material* to another person in Australia or aid, abet, counsel or procure such a transfer, unless the transferee is the holder of:
 - a) a current appropriate Permit to Possess Nuclear Material granted under section 13 of *the Act*; except for *nuclear material* to which Part II of *the Act* does not apply when in the possession of the transferee; or
 - b) a current appropriate Special Transport Permit granted under section 16 of *the Act*; except for *nuclear material* of a kind prescribed by the regulations for the purpose of sub-section 24(1) of *the Act*;
- 12.5. train all persons authorised by the Permit Holder to have access to *nuclear material* in the conditions of this Permit and the Permit Holder's procedures enabling it to meet these conditions;
- 12.6. notify the *Director General*, where a *loss of control* or incident involving *nuclear material* has occurred; and
- 12.7. apply any special conditions as set out in Appendix A of this Permit.



13. Inspections by ASNO Inspectors and Agency Inspectors

13.1. The Permit Holder shall:

- 13.1.1 provide *inspector(s)* with an up-to-date *inventory* listing at the commencement of an inspection;
- 13.1.2 provide, within 2 hours of a request by *inspector(s)*, copies of any other record(s), demonstrating that the Permit Holder has operated, and is operating, in compliance with this Permit and the *Compliance Code*;
- 13.1.3 ensure, at the time of each inspection, the presence of persons responsible for those areas being inspected and the necessary personnel responsible for handling the *nuclear material*;
- 13.1.4 make available, at the request of the *inspector(s)*, equipment that the Permit Holder has available for measurement of the *nuclear material* and, the means and staff required for handling the *nuclear material*;
- 13.1.5 if requested, provide suitable office space at the *Approved Locations* to facilitate inspection functions; and
- 13.1.6 afford *inspector(s)* every assistance and comply with any reasonable request in order to achieve a relevant safeguards purpose.

13.2. To further the health and safety requirements under the current Work Health and Safety legislation, and relevant state and federal legislation, regulations and standards, the Permit Holder shall:

- 13.2.1 provide to the *inspector(s)* (and the *Director General*, on request) sufficient information, training, instruction or supervision in order to allow those *inspectors* to comply with any health and safety procedures applicable at the *Approved Locations* and carry out their duties at the *Approved Locations* without risk to their health or safety;
- 13.2.2 provide the *inspector(s)* with all necessary personal protective equipment in order to ensure, so far as reasonably practicable, their health and safety while carrying out duties at the *Approved Locations*;
- 13.2.3 respond promptly to any request for information by an *inspector*, *Agency inspector*, or an officer of ASNO acting on behalf of such an *inspector*, regarding the procedures or equipment referred to in paragraphs 13.2.1 and 13.2.2; and
- 13.2.4 take any other reasonable steps to ensure the health and safety of the *inspector(s)* while those *inspectors* are at the *Approved Locations*, including steps to comply with any applicable provisions of a radiation protection law or regulation of the jurisdiction in which the Permit Holder is located which applies to the Permit Holder (in whole or in part).



PART 3

14. Inspections to be Permitted

- 14.1. The Permit is granted on condition that the Permit Holder consents, for the purposes of sections 59 and 60 of *the Act*, to all inspections carried out including:
- 14.1.1 the entry by any *ASNO inspector* upon any land or upon or into any premises occupied by the Permit Holder and the exercise by that *inspector* of any relevant power for any relevant safeguards purpose;
 - 14.1.2 the entry by any *ASNO inspector* upon any vessel, aircraft or vehicle in the control of the Permit Holder and the exercise by that *inspector* of any relevant power for any relevant safeguards purpose;
 - 14.1.3 the entry by any *Agency inspector* upon any land or upon or into any premises occupied by the Permit Holder, and the exercise by that *Agency inspector* of any relevant power for the purposes of carrying out an inspection that the *Agency* has the right to make in accordance with the *Agency Agreement* and the *Additional Protocol*;
 - 14.1.4 the entry by an *Agency inspector* upon any vessel, aircraft or vehicle in the control of the Permit Holder, and the exercise by that *Agency inspector* of any relevant power for the purposes of carrying out an inspection that the *Agency* has the right to make in accordance with the *Agency Agreement* and the *Additional Protocol*; and
 - 14.1.5 the Permit Holder shall provide upon request of an *inspector* or *Agency inspector* access to any place within an *Approved Location* as soon as possible, and in any case within 2 hours of a request for such access.
- 14.2. An *inspector* or *Agency inspector* exercising any relevant power is required to comply with the provisions of section 64 of *the Act*.

NOTE: Subject to the Administrative Appeals Tribunal Act 1975 and to sub-section 22(8) of the Nuclear Non-Proliferation (Safeguards) Act 1987, application may be made to the Administrative Appeals Tribunal, by or on behalf of a person whose interests are affected by a decision by the Minister, pursuant to sub-section (2) of section 13 of the Act, imposing a condition or restriction on the grant of a Permit, for review of the decision.



Appendix A – Special conditions for Permit PN207

1. For *nuclear material* that has been stored below ground since before the commencement date in paragraph 4.1 in shaft 92RS01, shaft 94RS01, trench 2000RT01, trench 2002RT01 or trench 2008RT01 (or any other below ground location/s with no intention of retrieval as approved by the *Director General* in writing on a case by case basis), the following special conditions shall apply:
 - a. Section 1.1.2 of the Compliance Code does not apply; and
 - b. Section 4.1.2 of the Compliance Code is replaced by
“securing inventory in a drum-in-drum structure where 60 litre drums are filled with cement-based grout and placed inside 200 litre drums filled with concrete, (or any other packaging structure as approved by the *Director General* on a case by case basis); and”
2. For any *nuclear material* that has not been stored below ground since before the commencement date in paragraph 4.1, the conditions in the Compliance Code shall apply and in particular:
 - a. the Permit Holder shall not receive or otherwise allow such *nuclear material* to arrive at an Approved Location prior to the receipt of written approval from the *Director General*; and
 - b. the Permit Holder shall not place below ground or allow the placement below ground of such *nuclear material* prior to the receipt of written approval from the *Director General*.

Note: In accordance with section 3 of the Compliance Code, the Permit Holder shall use the forms listed in section 3.1 for the purposes of seeking the approval of the *Director General*.

– END OF PERMIT –



COMPLIANCE CODE FOR CLASS L2 PERMITS

Compliance Code History

Version	Date of Effect	Description
1	18/09/2015	Compliance Code first issue
2	28/09/2020	New section 4.2, incorporation of definitions section, minor updates to various conditions
3		

Purpose

The purpose of this *Compliance Code* is to establish a standard set of requirements for the systems of *Nuclear Material Accounting and Control* and *Nuclear Security* for all Class L2 Permits to Possess Nuclear Material issued under section 13 of *the Act*. It also sets out forms for the submission of applications, notifications and reports.

Scope

This *Compliance Code* applies to Permits to Possess Nuclear Material issued under section 13 of *the Act* identified under paragraph 3 of the Permit as a Class L2 Permit. The requirements of the code apply to all *nuclear material* in the possession of the Permit Holder except *nuclear material* which is declared under section 11 of *the Act* as exempt from the application of Part II of *the Act*.

For the purpose of this *Compliance Code*, *nuclear security* will be taken to apply to *nuclear material* including *UOC*, but not to include other radioactive materials.

1. Nuclear Material Accounting and Control (NMAC) System

1.1. The Permit Holder shall:

- 1.1.1 keep an *inventory* listing of *nuclear material* up-to-date;
- 1.1.2 label all physical batches and containers of *nuclear material* on the Permit Holder's *inventory*, with unique identification markings in a way that enables timely matching with batch numbers assigned by ASNO;
- 1.1.3 maintain organisational arrangements enabling the Permit Holder to determine the precise location of any material on the Permit Holder's *inventory* in less than 2 hours;
- 1.1.4 keep records of transfers of *nuclear material*;
- 1.1.5 conduct a Physical Inventory Taking (stocktake) not more than thirty (30) days prior to and no later than 30 June each year (or other dates as may be designated by ASNO in advance), of any *nuclear material* on the *inventory*;
- 1.1.6 maintain organisational arrangements to detect any *loss of control of nuclear material* listed on the *inventory* within 7 days; and
- 1.1.7 retain records of holdings and transfers of *nuclear material* for a period of 5 years.

1.2. Given the low safeguards significance of material covered by Class L2 Permits, the Permit Holder is not required to develop formal written NMAC procedures.



2. Reports, Notifications and Requests for Approvals

- 2.1. The Permit Holder or *Designated Individual* shall report to, notify or apply to the *Director General* as appropriate for each activity or item listed in section 3.
- 2.2. Each such report, notification or application shall be made by completing the specified forms listed in section 3 or using other formats as approved by *ASNO*.
- 2.3. The reports, notifications or applications shall be delivered to the *Director General* in accordance with the reporting requirements specified on the respective form.
- 2.4. Reporting of domestic and international transfers:
The Permit Holder shall:
- 2.4.1 Provide an annual report (as at 30 June) to *ASNO* and submit the report by the 5th of July of the same year (or other dates as may be designated by *ASNO* in advance), including:
- (i) Physical Inventory Taking as described in section 1.1.5; and
 - (ii) All *inventory* changes that occurred during the reporting period.
- 2.4.2 Notify *ASNO* of all international transfers (dispatch of *nuclear material* under this Permit or receipt of *nuclear material* to this Permit) in accordance with the reporting timeframes and forms.

3. ASNO Forms

The Permit Holder shall use the forms listed in sections 3.1-3.3 available at www.dfat.gov.au/asno, as amended from time to time or the equivalent on *ASNO*'s online portal (the NUMBAT database portal <https://numbat.dfat.gov.au>).

3.1. Application Forms

APPLICATION FORMS TO CONDUCT CERTAIN ACTIONS: ¹	TIMEFRAME LIMITS FOR APPLICATIONS, NOTICE OR REPORTING: ^{2, 3}	FORM TO USE:
Application to Transfer Material (Import, Export or Domestic Transfer)	- 7 day notice	ASO106
Application to Consume, Dilute or Dispose of Nuclear Material or Associated Item ⁴	- 7 day notice	ASO108
Application to Create a New Approved Location	- 7 day notice	ASO112
Application to Vary Disposition of Material Such That it will Become Unavailable for Verification	- 14 day notice	ASO128

¹ Each report, notification or application should be made by the *Permit Holder's Representative* or by a *Designated Individual* as notified under ASO214, responsible for compliance with that application requirement.

² Refer to related form for detailed timeframe requirements. All days refer to consecutive business days.

³ For events requiring approval forms, the event must not take place before *ASNO* approval is granted.

⁴ *Nuclear material* may only be disposed of in such a way that the *nuclear material* will become practicably irrecoverable.



3.2. Notification Forms

NOTIFICATION IS REQUIRED FOR: ¹	TIMEFRAME LIMITS FOR APPLICATIONS, NOTICE OR REPORTING: ²	FORM TO USE:
Notification of an Incident	- Report incidents by phone within 2 hrs. of detection - submit form within 4 hrs.	ASO201
Notification of Designation of an Individual		ASO214
Notification of Change to Permit Holder's Particulars	- Within 10 days of effect of change	ASO231

3.3. Report Forms

REQUIRED REPORTS: ¹	TIMEFRAME LIMITS FOR APPLICATIONS, NOTICE OR REPORTING: ²	FORM TO USE:
Report on Incident Investigation	- Within 10 days of initial notification	ASO303
Inventory Listing (Nuclear Materials and Associated Materials)	- 5 days after the physical inventory taking date set in 1.1.5	ASO310
Ledger Page	- Report monthly transactions or - 5 days after the physical inventory taking date set in 1.1.5	ASO311
Description of each building at an approved Location	- 15th of March every year	ASO316
Initial inventory listing		ASO323

4. Security Measures

- 4.1. The Permit Holder shall maintain security measures for preventing the theft, loss or unauthorised handling of *nuclear material* and its associated records, including:
- 4.1.1 restricting access to *nuclear material* to persons who need to access such material;
 - 4.1.2 securing *nuclear material* in a lockable room or container or, for *nuclear material* incorporated into equipment, securing the equipment; and
 - 4.1.3 maintaining documentary records associated with the Permit conditions (e.g. defined access list, log in/out sheet)
- 4.2. The Permit Holder shall promptly notify *the Director General* within 2 hours of detection of each incident under Form ASO201 of a:
- 4.2.1 *loss of control* including actual, attempted or suspected theft, loss or compromise of *nuclear material*;
 - 4.2.2 unauthorised access to *nuclear material*; or
 - 4.2.3 adverse failure of the security measures.

¹ Each report, notification or application should be made by the *Permit Holder's Representative* or by a *Designated Individual* as notified under ASO214, responsible for compliance with that application requirement.

² Refer to related form for detailed timeframe requirements. All days refer to consecutive business days.



5. Definitions

(the) Act	The <i>Nuclear Non-Proliferation (Safeguards) Act 1987</i> .
Additional Protocol	The Protocol Additional to the Agency Agreement (INFCIRC/217/Add.1) that entered into force on 12 December 1997.
(the) Agency	The International Atomic Energy Agency (IAEA).
Agency Agreement	The Agreement between Australia and the International Atomic Energy Agency for the Application of Safeguards in Connection with the Treaty on the Non-Proliferation of Nuclear Weapons (INFCIRC/217), being the Agreement which was signed on behalf of Australia on 10 July 1974, a copy of which is set out in Schedule 3 of <i>the Act</i> .
ASNO	The Australian Safeguards and Non-Proliferation Office.
Designated Individual(s)	Individual(s) to whom the <i>Permit Holder's Representative</i> delegates some of the responsibility and authority with respect to compliance with this Permit.
Director General	The Director General of the Australian Safeguards and Non-Proliferation Office.
Inspector	A person appointed an inspector or a person declared an Agency inspector, pursuant to section 57 of <i>the Act</i> .
Inventory	The entire physical stock of <i>nuclear material</i> , irrespective of its form or usefulness, held by the Permit Holder.
Loss of Control (of material)	The Permit Holder has lost the ability to apply the Permit conditions (on a continuous basis) to <i>nuclear material</i> including UOC or associated items (including technology, material or equipment).
Nuclear fuel cycle-related research and development activities	Those activities which are specifically related to any process or system development aspect of any conversion of <i>nuclear material</i> , enrichment of <i>nuclear material</i> , nuclear fuel fabrication, reactors, critical facilities, reprocessing of nuclear fuel, processing (not including repackaging or conditioning not involving the separation of elements, for storage or disposal) of intermediate or high-level waste containing plutonium, or high enriched uranium or uranium-233. It does not include activities related to theoretical or basic scientific research or to research and development on industrial radioisotope applications, medical, hydrological and agricultural applications, health and environmental effects and improved maintenance.



Nuclear Material	<i>Source and special fissionable material</i> the same as in <i>the Act</i> but for the purposes of this Permit excludes material that has been deemed by ASNO as practicably irrecoverable (Schedule 3, Article 11 of <i>the Act</i>) or material that is the subject of an exemption or termination declaration under section 11 of <i>the Act</i> .
Nuclear Security	The prevention of, detection of, and response to, criminal or intentional unauthorised acts involving or directed at <i>nuclear material</i> , nuclear facilities and associated items. NOTE: <i>The Act</i> refers to physical security, which in relation to the protection of <i>nuclear material</i> , is defined as nuclear security or physical protection consistent with IAEA guidance material, and for the protection of associated items, as protective security consistent with the Australian Physical Security Policy Framework (PSPF).
Permit Holder's Representative	The representative of the Permit Holder (i.e. the organisation) who will take responsibility and sign documents on behalf of the organisation. This person must be in a position with sufficient authority to ensure all Permit conditions are met.
Source Material and Special Fissionable Material	The same as in Schedule 1 of <i>the Act</i> .
UOC	Uranium ore concentrates

NOTE: Subject to the Administrative Appeals Tribunal Act 1975 and to sub-section 22(8) of the Nuclear Non-Proliferation (Safeguards) Act 1987, application may be made to the Administrative Appeals Tribunal, by or on behalf of a person whose interests are affected by a decision by the Minister, pursuant to sub-section (2) of section 13 of the Act, imposing a condition or restriction on the grant of a Permit, for review of the decision.

APPENDIX E

2021 – 2022 Management Plans



ENVIRONMENTAL, HEALTH & SAFETY AND RADIATION MANAGEMENT PLANS

INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

In accordance with proponent commitment 3.1 - 3.8 of the Ministerial Statement for the operation and management of the IWDF, Mt Walton East eleven Management Plans have been developed.

These Management Plans provide a summary of the methods and controls that are in place, and must be maintained, to achieve ongoing management goals and targets and maintain operational performance.

Each Management Plan is designed to address an aspect of the IWDF's activities or management, as listed below:

1. Air Quality
2. Decommissioning and Rehabilitation
3. Emergency Response
4. Flora and Fauna
5. Health and Safety
6. Radiation
7. Transport
8. Water
9. Waste Acceptance
10. Community Liaison
11. Management Review



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO. 1
INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

AIR QUALITY

Environmental, Health and Safety Policy Statement:

Take all practical steps to minimise the impact of the site and operational activities on the environment, and the community, and ensure the protection of the health and safety of the public and the IWDF personnel by appropriate training of all personnel.

Management Goal:

To effectively manage air quality at the IWDF.

Management Objective:

To ensure dust and air emissions are monitored and managed effectively to minimise potential risks to health and the environment.

Management Target:

- No waste dust released during operations at the site.
- Minimal atmospheric emissions from vehicles and machinery.
- No health or environmental effects resulting from air or dust emissions.

Management Program:

- FMC will undertake inspections to ensure that waste is appropriately packaged, transported, and unloaded to prevent spillage or rupture.
- If a waste package ruptures, the waste material will be covered as soon as possible, and any spillage immediately contained and recovered.
- Appropriate personal protective equipment and safety measures will be utilised when necessary.
- Dust suppression techniques will be employed during earthworks.
- Dust monitoring shall be undertaken.
- Vehicles and machinery will be serviced regularly to ensure optimal efficiency.

Improvement Program:

Nil

Relevant Documents and Procedures:

- Environmental Procedure EP-06: Air Quality and Dust Management.
- Environmental Instruction EI-02: Soil and Dust Environmental Sampling.
- Emergency Response Procedure ERP-01: Incident Prevention, Reporting & Investigation.
- OHS&ER Procedures (operation specific air quality requirements).
- A guideline for managing the impacts of dust and associated contaminants from land development sites, contaminated sites remediation and other related activities (DEC Mar 2011).
- AS / NZS 3580.10.1: 2016 Methods for Sampling and Analysis of Ambient Air - Determination of particulate matter - Deposited matter - Gravimetric method. (Currency checked May 2022)
- AS / NZS 3580.1.1: 2016 Methods for Sampling and Analysis of Ambient Air - Guide to siting air monitoring equipment. (Currency checked May 2022)



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO. 1
INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

- AS / NZS 3580.9.13:2022 Methods for sampling and analysis of ambient air - Determination of suspended particulate matter - PM2.5 continuous direct mass method using a tapered element oscillating microbalance monitor. (Standard revised March 2022).

Forms:

- IWDF Form-03: Sampling/Groundwater Monitoring Record.
- IWDF Form-01: Chain of Custody.

Monitoring of Performance:

- Predisposal monitoring:- 5 days minimum dust sampling.
- Disposal operations: dust samples will be collected during disposal at designated sites around the cell.
- In the case of a spill, samples shall be gathered from gauges in the vicinity of the spill and downwind.

Reporting:

Annual Performance and Compliance Report

Key Responsibilities:

- Facility Management Contractor – monitoring.
- Environment Manager: Implementation.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2A
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

DECOMMISSIONING AND REHABILITATION - A
OPERATION SPECIFIC AND ONGOING

Environmental, Health and Safety Policy Statement:

Use recognised current best practices for near surface disposal of hazardous and low-level radioactive wastes and to remain aware of international advances in intractable waste management technology.

Management Goal:

To return the site to as close as original condition as possible.

Management Objective:

To ensure that areas of the site that have ceased to be operational are progressively decommissioned and rehabilitated in manner which restores the original ecosystem.

Management Target:

- Re-establishment of indigenous habitats following conclusion of their operational use.
- No introduction of non-indigenous species.

Management Program:

- Vegetation and topsoil cleared during operations is stockpiled nearby.
- Cleared areas shall be rehabilitated using the stockpiled vegetation and topsoil following completion of their use (except for fenced disposal compounds and tracks used for access).
- Areas undergoing rehabilitation will be monitored annually by the FMC and assessed by a botanist every ten years. Assessment by a botanist should be next undertaken in October 2024.
- Upon completion of site works temporary infrastructure shall be removed.
- Disused tracks and road shall be allowed to revegetate naturally.

Improvement program:

- Nil – see long term & site closure management plan below.

Relevant Documents and Procedures:

- Environmental Procedure EP-05: Rehabilitation Management (includes vegetation completion criteria).
- Environmental Instruction EI-04: Rehabilitation Monitoring.
- Flora identification kit (significant flora) – located within FMC EHSQMS.
- Proposed Final Cover for Waste Disposal Cells at the Intractable Waste Disposal Facility, Mt Walton East (Clayvault WA, May 2014, reviewed 2019) RCWA approval received 17 February 2022. Review of rehabilitation scenarios required every five years.

Forms:

- IWDF Form 38a: Rehabilitation Monitoring Record.
- IWDF Form 39: Monitoring Register.
- Monitoring Location Figure – showing location of photo points, monitoring bores and any priority flora.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2A INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST
Performance Monitoring: <ul style="list-style-type: none">• Botanist: Inspect the progress of rehabilitation every ten years (next due Oct 2024).• FMC personnel: annual monitoring of rehabilitation (preferably in spring (next due Oct 2022))
Reporting: Annual Performance and Compliance Report - monitoring results for the reporting period
Key Responsibilities: <ul style="list-style-type: none">• FMC Site Personnel: Annual Monitoring• Botanist: Rehabilitation Progress Status
ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2B MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY
DECOMMISSIONING AND REHABILITATION - B LONG TERM AND SITE CLOSURE
Environmental, Health and Safety Policy Statement: Use recognised current best practices for near surface disposal of hazardous and low-level radioactive wastes and to remain aware of international advances in technology.
Management Goal: To return the site to as close as original condition as possible.
Management Objective: To ensure that the site is rehabilitated and decommissioned in manner which restores the original ecosystem.
Management Target: <ul style="list-style-type: none">• Re-establish removed and disturbed indigenous habitats to their original level of species diversity.• All site infrastructure removed.
Management Program: <ul style="list-style-type: none">• A decommissioning statement will be prepared six months prior to decommissioning.• Proposed Final Cover for Waste Disposal Cells at the Intractable Waste Disposal Facility, Mt Walton East (Clayvault WA, May 2014, reviewed 2019) RCWA approval received 17 February 2022. Review of rehabilitation scenarios required every five years.• The decommissioning statement will include a zone of restricted occupancy outside the site perimeter as a region in which there is public access, but in which permanent occupancy is prohibited for the institutional control period.
Improvement program: <ul style="list-style-type: none">• Seek approval from the RCWA for the review of rehabilitation scenarios as completed May 2014 and reviewed / resubmitted 2019.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 2B
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

Relevant Documents and Procedures:

- Environmental Procedure EP-05: Rehabilitation Management (includes veg completion criteria).
- Work Instruction WI-04b: Rehabilitation Monitoring.
- Decommissioning and Rehabilitation Plan (to be developed 6 months prior to closure).

Forms:

- IWDF Form 38a: Rehabilitation Monitoring Record.
- IWDF Form 39: Monitoring Register.
- Monitoring location figure showing vegetation photo point locations & groundwater monitoring & priority flora locations.

Performance Monitoring:

- Botanist: Inspect the progress of vegetation rehabilitation every ten years – next due Oct 2024
- IWDF Project Manager: Monitoring of rehabilitation every 12 months (in spring) next due Oct 2022.

Reporting:

Annual Performance and Compliance Report

Key Responsibilities:

IWDF FMC Project Manager: coordinate development of Decommissioning Statement and Rehabilitation Plan when required.

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 3
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

EMERGENCY RESPONSE

Environmental, Health, Safety and Quality Policy Statement:

- Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EHSQMS, the Environmental, Health & Safety and Quality Policy and operational activities at the IWDF, through a process of continual review.
- Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.

Management Goal:

To prevent and effectively manage emergency incidents at the IWDF.

Management Objective:

To ensure emergencies are responded to and managed effectively and efficiently.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 3
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Management Target:

- No lost time injuries.
- No harm or injury to the public or environment.
- Quick, accurate and effective responses to emergencies.
- Continual improvement and revision.

Management Program:

- Implement effective and appropriate emergency response procedures.
- Report thoroughly on all emergency or potentially emergency incidents.
- Investigate all incidents, accidents and near misses and implement corrective actions to prevent recurrence.
- Provide all personnel with the appropriate equipment and training.

Improvement Plan:

Nil

Relevant Documents and Procedures:

- Emergency Response Procedure ERP-01- Incident Prevention, Reporting and Investigation.
- Emergency Response Procedure ERP-02- Emergency Response Management.
- Management Procedure MP-13- Control of Non-Conformances & Corrective & Preventative Action.
- Emergency Response Instruction ERI-01 Injury and Evacuation.
- Emergency Response Instruction ERI-02 Waste Incident and Spill Response.
- Emergency Response Instruction ERI-03 Fire Response.
- Emergency Response Instruction ERI-04 Transport Emergency Response.
- State Emergency Management a Strategic Framework for Emergency Management in Western Australia (came into effect 21 Dec 2018)
- State Hazard Plan: Hazardous materials emergencies (HAZMAT) (came into effect 21 Dec 2018)

Forms:

- Emergency procedure sheets.
- IWDF Form 06: Near Miss/ Incident/ Accident/Exposure Report.
- IWDF Form 07: Near Miss/Incident/Accident/Exposure Report Register.
- IWDF Form 36: Emergency Response Team Contact Details.
- IWDF Form 42: Emergency Response Equipment Checklist.
- Corrective Action Form (CAR)- MF-13-2.

Performance Monitoring:

Review and assessment of effectiveness of corrective actions

Reporting:

- Close out Report
- Annual Performance & Compliance report, operational specific incidents, and other incidents such as fires outside operations.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 3
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Key Responsibilities:

- Operations Manager / Safety Manager – revision, maintenance, and implementation
- IWDF FMC Project Manager – reporting

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 4
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

FLORA AND FAUNA

Environmental, Health, Safety and Quality Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EHSQMS, the Environmental, Health & Safety and Quality Policy and operational activities at the IWDF, through a process of continual review.

Management Goal:

To minimise the impacts of the site on native flora and fauna.

Management Objective:

To ensure that potential impacts on native flora and fauna are effectively managed.

Management Target:

- Minimal impacts on native flora and fauna.
- Identify priority or endangered species.
- Prevent the contamination of flora, fauna and their habitats through dust.
- Prevent the introduction of non-indigenous species.

Management Program:

- Flora and fauna surveys shall be undertaken to identify species at the site.
- Prior to any clearing the conservation status of plants in that area will be determined and clearing avoided in areas containing priority species.
- A botanist shall be brought to site prior to significant clearing, where necessary.
- Unnecessary clearance or disturbance of vegetation shall be avoided.
- Fauna injuries and deaths will be treated as environmental incidents.
- Drivers within the IWDF shall be aware of native fauna .
- Trenches and boreholes shall be designed to prevent the trapping of fauna.
- Dust suppression techniques shall be used during operations.
- Priority flora identification kit to be regularly updated (to be reviewed October 2022).
- Weed identification kit – regularly reviewed (to be reviewed October 2022)

Improvement program:

Nil



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 4
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

Relevant Documents and Procedures:

- Environmental Procedure EP-01- Vegetation (Flora) Management.
- Environmental Procedure EP-02- Fauna Management.
- Emergency Response Procedures ERP-01- Incident Prevention , Reporting and Investigation.
- Environmental Procedure EP-05- Rehabilitation Management (includes veg completion criteria).
- Environmental Procedure EP-06- Air Quality and Dust Management.
- Florabase Declared Rare Flora and Priority Database.
- Flora and weed identification kits.

Forms:

- Location maps of priority species – Groundwater, trench capping and rehabilitation monitoring locations.

Performance Monitoring:

Flora (and Fauna) surveys as required.

Reporting:

Identification of new priority or rare species – Department of Water & Environmental Regulation.

Key Responsibilities:

Environment Manager on advice of Botanist: approval of significant clearing.
Environment Manager: management of protection of flora and fauna.

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 5
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

HEALTH AND SAFETY

Environmental, Health, Safety and Quality Policy Statement:

- Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EHSQMS, the Environmental, Health & Safety and Quality Policy and operational activities at the IWDF, through a process of continual review.
- Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.

Management Goal:

To provide a safe workplace and implement programs and strategies that ensure legislative compliance.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 5
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Management Objective:

To minimise the health and safety risks to the public and workers through the identification and management of potential risks.

Management Target:

- No lost time injuries.
- No major accidents or incidents.
- No complaints from the public.

Management Program:

- Comply with Operation Health and Safety and Emergency Response Procedures.
- Maintain a Health & Safety Aspects and Impacts Register.
- Ensure Safety Data Sheets are readily available.
- Report all incidents and near misses and implement corrective actions.
- Ensure appropriate safety equipment is worn and maintained, and all personnel are adequately trained.
- Hold safety management briefings, as appropriate to activities.
- Undertake regular site safety inspections and operation safety audits.
- Replace fire extinguishers every 5 years. Last replaced January 2020, due to be replaced January 2025.

Improvement Program:

Ensure that the IWDF health and safety processes and procedures comply with the *Work Health and Safety Act 2020* (WHS Act) and accompanying regulations which will commence in March 2022.

Relevant Documents and Procedures:

- Safety Procedure SP-01- Health and Safety Management and Planning.
- Safety Procedure SP-02 Operation Site Safety Management.
- Safety Instruction SI-01 Excavation Safety.
- Safety Instruction SI-02 Personal Protective Equipment.
- Safety Instruction SI-03 Hygiene and Decontamination.
- Safety Instruction SI-04 Occupational Monitoring.
- Safety Instruction SI-06 First Aid.

Forms:

- IWDF Form 06: Near Miss Incident/Accident/Exposure Report
- IWDF Form 34: Safety Management Schedule
- IWDF Form 37: Transport Induction Form
- IWDF Form 43: Medical Advice Form
- IWDF Form 12a: Competency Plan
- IWDF Form 12b: Operational Training Register
- IWDF Form 27: Safety Record
- IWDF Form 28: Excavation Safety Record
- IWDF Form 30: Safety Audit Checklist
- IWDF Form 32: General Induction Form
- IWDF Form 33: Waste Handling Induction Form



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 5
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Performance Monitoring:

- Safety Briefings.
- Site Inspections and operational safety audits.
- Effectiveness of corrective actions.
- Complaints.

Reporting:

Incidents: reported in accordance with ERP-01

Key Responsibilities:

- Health & Safety Manager and Operations Manager: Training, management, and implementation on site.
- Health & Safety Manager: planning and ongoing management

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 6
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

RADIATION

Environmental, Health and Safety Policy Statement:

Use recognised current best practices for near surface disposal of hazardous and low-level radioactive wastes and to remain aware of international advances in technology.

Management Goal:

To ensure radiation is managed effectively.

Management Objective:

To monitor and manage radioactive waste to ensure the environment, public and workers are protected from the adverse effects of radiation.

Management Target:

- Minimal release of radiation into the environment (compared to environmental background).
- Radiation levels within the safe occupational limits for workers.
- Comply with *Code for Disposal Facilities for Solid Radioactive Waste* (released October 2018).



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 6
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

Management Program:

- All radioactive wastes will be assessed against the Acceptance Criteria for Radioactive Wastes and be packaged and transported in the approved manner.
- The Radiological Council shall approve the design of the disposal trench.
- Radioactive waste will be placed in the disposal cell in accordance with the Radiological Council approvals and the position and activity of each drum recorded.
- A permanent marker shall be placed above all trenches containing radioactive waste.
- All personnel who come into proximity with radioactive waste shall attend an induction and wear personal radiation monitors.
- Predisposal, and post disposal occupational radiation monitoring shall be undertaken.
- Predisposal and post disposal environmental radiation monitoring shall be undertaken.
- Monitoring program for public dose constraint shall be undertaken.
- Gamma radiation surveys are to be conducted every five years, or associated with a burial operation involving radioactive waste, whichever is the shortest interval – last survey completed Sept 2017.
- Third party technical compliance audit against the requirements of the *Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992)* (NH&MRC, 1993) every five years (last completed October 2018) – although new code has been released compliance with the 1993 CoP is still required as it is called up in s31A of the Radiation Safety Regulations 1983 and the IWDF registration.

Improvement Program:

- Investigate appropriate below ground markers before next disposal of radioactive waste.
- Complete procedure for providing public access to database.
- Complete Operation and Closure Safety Assessment and Case.
- Document analysis of the behaviour of the cement matrix.

Relevant Documents and Procedures:

- Radioactive Waste Acceptance guidelines.
- Radioactive Instruction RI-01 Gamma Radiation Monitoring.
- Work Instruction RI-02: Occupational Radiation Monitoring.
- Radiation Management Procedure RP-01: Radiation Management.
- Safety Assessment Report for the IWDF draft –21 October 2016 Operations Safety Case for the IWDF (draft) – prepared 20 April 2017 as amended.

Forms:

- Personal Radiation Monitoring form PRM-1: Passive Personal Radiation Monitors
- Personal Radiation Monitoring form PRM-2: Integrated Electronic Dosimeters
- Personal Radiation Monitoring form PRM-3: Personal Air Sampling
- Personal Radiation Monitoring form PRM-4: gross alpha activity concentration



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 6
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

Performance Monitoring:

- Pre-burial environmental radiation monitoring of disposal area.
- Post-burial environmental radiation monitoring of the disposal compound.
- On-going environmental radiation monitoring of disposal compounds – next 5 yearly round of monitoring to be undertaken in October 2022.
- Occupational Radiation Monitoring.

Reporting:

- Radiological Council: copy of each radiation monitoring report and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NH&MRC, 1993).
- Community Liaison Committee: copy of each radiation monitoring report and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NH&MRC, 1993).
- EPA: Annual Performance and Compliance Report which will include a copy of all radiation monitoring for relevant reporting periods and third-party technical compliance audit against the requirements of the Code of Practice for the Near-Surface Disposal of Radioactive Waste in Australia (1992) (NH&MRC, 1993) when completed.

Key Responsibilities:

Radiation Safety Officer – radiation monitoring

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 7
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

TRANSPORT

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EHSQMS, the Environmental, Health & Safety and Quality Policy and operational activities at the IWDF, through a process of continual review.

Management Goal:

To effectively manage the transport of waste to the IWDF.

Management Objective:

To ensure waste is transported in a manner which minimises any potential risks to humans or the environment.

Management Target:

- No unacceptable (above background) effects on health or the environment from the transport of waste.
- No spill or leakage of waste during transport.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 7
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Management Program:

- Operation Transport Procedures (OTP) shall be developed for each operation, which provide details of transport and packaging, emergency preparedness, contractor responsibilities, procedures, communications, and emergency response recovery, and are submitted to the EPA.
- Procedures for communications with the emergency response team, local community and emergency services shall be prepared and detailed in the OTP.
- Waste shall be packaged, labelled, and transported in accordance with the OTP and applicable dangerous goods and radioactive legislation, and a Finance delegate will inspect prior to transport to ensure compliance.
- Personnel involved in loading and transport of waste (including contractors) shall be briefed on the potential risks, emergency response and communication procedures.
- Appropriate protective clothing and equipment shall be used.
- Emergency Response Team (ERT) members shall be appropriately trained and equipped.
- Shipping documentation, OTP and emergency information shall be kept in the transport vehicle.
- If required, the Department of Fire & Emergency Services (DFES), Department of Mines, Industry Regulation & Safety (DMIRS), and the local shires shall be informed of transport routes and schedules.

Improvement Program:

Nil

Relevant Documents and Procedures:

- Waste Acceptance Criteria / Guidelines.
- Operational Procedure OP-04:Waste Preparation for Disposal.
- Operational Procedure OP-05: Waste Loading and Transport.
- Operation Transport Procedures.
- Emergency Response Plans.
- Emergency Response Instruction – Transport Emergency Response.
- Safety Instruction SI-07 Heavy Machinery Operations.
- Safety Instruction SI-05 Communications and Traffic Control.
- Operational Procedure OP-06: Waste Delivery, Acceptance and Disposal.

Forms:

- IWDF Form 45: Packaging and Loading Checklist
- IWDF Form 37: Transport Induction
- IWDF Form 35: Transport Incident Questionnaire
- IWDF Form 46: Transport Chain of Custody
- IWDF Form 47: Vehicle Checklist

Performance Monitoring:

Validation sampling in the event of a spill.

Reporting:

- **Close-out report:** results of operation specific transport activities
- Annual Performance and Compliance Report



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 7
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Key Responsibilities:

- FMC Operations Manager and Transport Coordinator: Supervision and Implementation
- FMC Project Manager : Reporting

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 8
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

WATER

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EHSQMS, the Environmental, Health & Safety and Quality Policy and operational activities at the IWDF, through a process of continual review.

Management Goal:

To effectively manage and protect groundwater and surface water.

Management Objective:

To ensure groundwater and surface water are monitored and managed to prevent contamination and minimise operational delays.

Management Target:

- No contamination of ground and surface water from waste components.
- Minimal operational difficulties and delays due to water.

Management Program:

- Operations will not be planned for the wet season.
- Regular weather reports will be obtained during waste disposal periods and site activities scheduled to avoid waste acceptance and burial activities during rainfall.
- The trench and drainage systems will be designed and positioned to avoid the infiltration of surface water and potential groundwater effects.
- When heavy rainfall is expected temporary berms and V drains will be constructed and any waste in the open trench covered with compacted sand and gravel.
- Groundwater monitoring shall be undertaken.
- Water which accumulates in the trench, will be allowed to dry in situ, or if suspected to be contaminated removed and analysed.

Relevant Documents and Procedures:

- Environmental Procedure EP-04: Surface Water Management
- Environmental Procedure EP-03: Environmental Monitoring Management
- Environmental Instruction EI-01: Groundwater Monitoring

Improvement Program:

Nil



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 8
MT WALTON EAST INTRACTABLE WASTE DISPOSAL FACILITY

Forms:

- IWDF Form 01: Chain of Custody Record
- IWDF Form 03: Sampling and Groundwater Monitoring Record
- IWDF Form 21: Groundwater Analysis Register
- IWDF Form 39: Monitoring Register
- Monitoring Bore Location Figure and site contour maps

Performance Monitoring:

- Ongoing Groundwater Monitoring – every 6 months
- Operational Groundwater Monitoring- immediately before and after an operation

Reporting:

- Annual Performance and Compliance Report: Groundwater monitoring results.
- Operation Close-out report: operation specific surface water management results.

Key Responsibilities:

- Operations Manager- drainage construction and surface water management
- Environmental Manager – groundwater monitoring



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 9
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

WASTE ACCEPTANCE

Environmental, Health and Safety Policy Statement:

- Maintain a strict adherence to the “waste hierarchy” by ensuring that there is no **practically available** reuse, recycling, treatment, destruction, or alternative disposal options in Australia for all wastes accepted for disposal at the IWDF.
- To ensure that only wastes generated in Western Australia are accepted for disposal at the IWDF.

Management Goal:

To assess all waste management options and suitability of the waste, prior to accepting waste for disposal.

Management Objective:

To ensure that only waste that meets the Waste Acceptance Criteria is accepted for disposal at the IWDF.

Management Target:

- All wastes disposed at the IWDF have no other practically available avoidance, waste reduction, treatment, recycling, and reuse alternative at the time of acceptance.
- No wastes generated outside Western Australia will be accepted for disposal at the IWDF,
- Wastes that are in the following categories are not accepted, without prior conditioning, at the IWDF:
 - Free liquid or sludge (except in small volumes)
 - Explosive materials
 - Highly flammable materials
 - Highly reactive or chelating agent materials
 - Compressed gases (greater than 5% by waste volume)
 - Materials that may decompose
 - Toxic, pathogenic, or infectious radioactive materials.

Management Program:

- Ensure all waste owners wishing to dispose of waste at the IWDF provide adequate details of the wastes, in accordance with Waste Acceptance Guidelines.
- Assess a waste owners waste details against the waste acceptance criteria.
- Provide details of the wastes in the Operational and Waste Acceptance Environmental Procedures submitted to the EPA.
- Undertake inspections of the waste.

Improvement Plan:

Continue to monitor the current approach to waste acceptance – to implement a more practical approach to the adherence to the waste hierarchy to ensure there are no inadvertent barriers to appropriate waste being disposed at the IWDF so that all waste that requires disposal can be disposed in a cost-effective manner.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 9
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Relevant Documents:

- Guideline: Chemical Waste Acceptance
- Guideline: Radioactive Waste Acceptance
- Operation Procedure: Operation Environmental and Waste Acceptance Procedures
- Management Procedure MP-08: Operational Planning and Management
- Operation Procedure: OP-01 Assessment of applications for disposal
- Operational Procedure OP-02 Operational Administration, Planning and Approvals
- Operational Instruction OI-1 Waste Inspection

Forms:

- Waste Acceptance Proforma.
- IWDF Form 53: Waste Inspection Checklist.
- IWDF Form 55: Waste Assessment Checklist.

Performance Monitoring:

Inspections and assessment of waste

Reporting:

- EPA: Performance and Compliance Report.
- EPA: Close-out Report.
- EPA/Radiological Council: Operation Environmental and Waste Acceptance Procedures.

Key Responsibilities:

- IWDF Project Manager: Ensure wastes for disposal comply with the waste acceptance criteria.
- IWDF Project Manager and Operations Manager : waste inspections.
- Operations Manager: Acceptance of wastes at site.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 10
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

COMMUNITY LIAISON

Environmental, Health and Safety Policy Statement:

Liaise directly with the community on all operational activities and outcomes and ensure that all disposal details and monitoring records/auditing records, are both publicly available and securely stored for future reference.

Management Goal:

To ensure the community is adequately informed regarding the IWDF and its operations.

Management Objective:

To ensure that the community is informed of IWDF activities and has easy access to important documents and information regarding the site, both now and in the future.

Management Target:

- Details of all wastes disposed at the IWDF are readily available to the community.
- Representatives of the community can regularly voice their concerns and discuss issues and changes to the management of the IWDF.
- Community is kept informed with all activities associated with the IWDF.
- Zero complaints from the community.

Management Program:

- Maintain a public database / register which provides details of all waste disposed at the IWDF. Publicly available register (Spreadsheet) will be accessible through the Government web page for the IWDF.
- Respond efficiently to complaints and undertake appropriate corrective actions.
- An archiving schedule and record retention table are maintained to ensure that documents are archived to allow future generations access to the information.
- A CLC, containing members of the community meets quarterly to raise community concerns, review important documents and provide input into operational decision making. Note: At the October 2021 CLC meeting the CLC agreed to reduce the frequency of meetings to three meetings a year. Ministerial Statement 562 remains unchanged.
- Ensure information regarding the IWDF on Government web page for the IWDF – handbook, brochure etc. is always up to date.

Improvement Program:

- Publicly available waste disposal spreadsheet on the Government web page for the IWDF .



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 10
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Relevant Documents and Procedures:

- IWDF Waste Inventory Database/publicly available spreadsheet
- Management Procedure: MP-05 Communication and Public Relations
- Management Procedure: MP-07 Management of Records
- IWDF Complaints Register

Forms:

- MF-07-1: Archiving schedule
- MF-07-2: Record Retention Table

Performance Monitoring:

- Community Liaison Committee: provides community feedback.
- Management Review Meetings: detail number of complaints and corrective actions.
-

Reporting:

- Annual Performance and Compliance Report
- Radiological Council: Annual Radiological Report (Radiological Council have specified that they will accept submission of Annual PCR in place of a separate Radiological Report).

Key Responsibilities:

FMC Project Manager: implementation and reporting

ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 11
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

REVIEW OF MANAGEMENT

Environmental, Health and Safety Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EHSQMS, the Environmental, Health & Safety and Quality Policy and operational activities at the IWDF, through a process of continual review.

Management Goal:

To manage the IWDF and its operations as efficiently and successfully as possible.

Management Objective:

To ensure the IWDF meets all requirements and follows the principle of continual improvement.



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 11
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Management Target:

- Operation and management of IWDF complies with all regulatory requirements and conditions and commitments.
- EHSQMS successfully mitigates risks and impacts from the site.
- Establish and maintain current best practice for the near surface disposal of hazardous and low-level radioactive materials.

Management Program:

- Undertake regular audits of the management system.
- Hold management review meetings every six months.
- Undertake disposal operation audit of operational procedures.
- Produce an annual performance and compliance report and submit to EPA, DWER and Radiological Council.
- Correct non-conformances as soon as possible and ensure corrective/preventative actions are in place.
- Regularly review the situation regarding current disposal practices and the awareness of international best practices and advances in technology.
- Liaise regularly with national and international waste management regulators.

Improvement Plan:

Submit annual PCRs to State Library to fulfil legal deposit requirements. Legal Deposit Regulations 2013 for print and other non-online publications including audio-visual came into force on 1 January 2014.

Relevant Documents and Procedures:

- Management Procedure: MP-11 Management Audits
- Management Procedure: MP-12 Management Review
- Management Procedure: MP-02 Applicable Laws and Regulations
- Management Procedure: MP-13 Control of Non-Conformance & Corrective and Preventative Action
- Emergency Response Procedure ERP-Incident Prevention, Reporting and Investigation
- Facility Management Procedure FMP-04 System Audit
- Facility Management Procedure FMP-05 Control of Non-Conformance

Forms:

- MF-11-3: Audit Report Log
- MF-11-1: Corrective Action Request
- MF-11-2: Internal Management Audit schedule
- MF-11-4: CAR Log
- IWDF Form 10: System Corrective Action Request
- IWDF Form 11: System Corrective Action Register
- IWDF Form 49: Audit Report Register
- IWDF Form 50: Audit Schedule

Performance monitoring:

Management Review Meetings



ENVIRONMENTAL HEALTH & SAFETY MANAGEMENT PLAN NO: 11
INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST

Reporting:

- Management Review Meetings.
- Performance and Compliance Report.

Key Responsibilities:

- Finance IWDF Project Manager: implementation
- Finance IWDF Project Director: review of management
- FMC IWDF Project Manager: implementation



Rev	Date	Description	Prepared by:	Checked by:	Approved by:
1	17/09/01	Draft	LCH	LM	
2	4/10/01	Draft	LCH	MJS	
3	1/10/07	Draft	LM	MJS	
4	22/06/09	Draft	LM	MJS/RH	
5	01/07/10	Draft	LM	RH/MJS	
6	04/08/11	Draft	LM	RH	
6.1	14/12/11	Review for PCR	LM	MJS	
7	12/03/12	Review & minor changes to Plans 2, 3 & 4	LM	RH	
7.1	13/09/12	Review & minor changes to Plans 3 & 4	LM	MJS	
8	07/01/13	Review & minor changes to Plans 5 & 6	LM	MJS	
8.1	16/07/13	Review & minor changes to Plans 2, 3 & 4	LM	MJS	
9	15/01/14	Review & minor changes to Plans 2, 3, 4 & 4	LM	MJS	
10	17/04/14	Review and acceptance of past changes	LM	LM & RH	RH
10.1	09/01/15	Review & update to improvement program sections of each plan	LM		
11	25/05/15	Review & update to improvement program sections of each plan and changes to Management program for plans 2a, 2b & 6	LM	LM & RH	
12	24/05/16	Review & update to improvement program sections of each plan and changes to Management program for plans 2b & 6	LM		MJS
13	13/07/16	Review & update to improvement program sections of each plan and changes to Management program for plans 1, 2b & 4	LM		MJS
14	14/02/17	Review & update to improvement program sections of each plan and changes to Management program for plans 1, 2b, 4, 6 & 11.	LM		MJS
15	23/05/17	Update to plan 6 to include OSC and Safety Assessment	LM		MJS
16	6/12/17	Update to improvement plan sections to include outcome as agreed at MRM held 22 June 17	LM		MT
17	27/09/18	Review with consideration to the updated legislation e.g., DG transport, Cops etc, dates for upcoming events updated	LM		
18	10/05/19	Plan 3 updated to include the New (Dec 218) State Emergency Management Plan & Hazmat Plan, Plan 6 updated to include new code, Plan 11 updated improvement request re MRM	LM		MT
19	15/11/19	Reviewed and updated prior to planned disposal for Feb 2020 only significant change MP04 where advice from DWER regarding clearing permit requirements has been included.	LM		MT
20	12/05/20	Reviewed/ updated to remove improvement plans that are now completed.	LM	MT	MT
21	22/11/20	Management Plan 11 – change to meeting frequency	LM	MT	MT
22	15/05/21	Review, update to improvement program of Management Plan 6 – MPs reviewed and agreed on at MRM held 3 June 2021, AS /N/ZS standards checked for currency May 2021.	LM	MT	MT
23	03/11/21	General formatting changes to all plans, update to dates for monitoring events etc., Policy statement updated to reflect current naming conventions in plans	LM	MT	MT



		3,4,5,7,8, and 11. Plan 11 new Improvement Plan item, Plan 9 updated item in Management Target section, where improvements plans were completed, action was moved to Management Program for ongoing maintenance			
24	7/02/22	Update to Plan 5 to include requirement for fire extinguisher replacement.	LM		
25	12/05/22	Plan 1 update to AS / NZS 3580.9.13. Plans 2a and 2b updated to include Final Cover approval from RCWA	LM	MT	MT

APPENDIX F

Notice of Revocation of a Proponent and Notice of Nomination as Proponent



Environmental Protection Act 1986

**SECTIONS 38I
NOTICE OF REVOCATION OF A PROPONENT AND
NOTICE OF NOMINATION AS PROPONENT**

PERSON TO WHOM THIS NOTICE IS GIVEN

- (a) Department of Finance, Building Management and Works
(ABN: 99 593 347 728)
Optima Centre
16 Parkland Road
OSBORNE PARK WA 6017
- (b) Minister for Works C/- Department of Finance
(ABN: 99 593 347 728)
Optima Centre
16 Parkland Road
OSBORNE PARK WA 6017
- (c) Environmental Protection Authority
Locked Bag 10
JOONDALUP DC WA 6919
- (d) Relevant Decision-Making Authorities, see Attachment 1

PROPOSAL TO WHICH THIS NOTICE RELATES:

Proposal Title: Intractable Waste Disposal Facility, Mt Walton East,
Shire of Coolgardie
Assessment No.: 1286
Statement No: 562

Pursuant to section 38I of the *Environmental Protection Act 1986*, I, as a delegate of the Minister for Environment:

- (a) revoke the nomination of Department of Finance, Building Management and Works as the person responsible for the Proposal; and
- (b) nominate Minister for Works C/- Department of Finance as the person responsible for the Proposal.

Dr Robert Hughes
Delegate of the Minister for Environment

21 January 2022

Attached: Relevant Decision Making Authorities.

Relevant Decision Making Authorities

Director General, Department of Water and Environmental Regulation
Chief Dangerous Goods Officer, Department of Mines, Industry Regulation
and Safety
Secretary, Radiation Council

APPENDIX G
DWER AAC Report



Annual Audit Compliance Report Form

Environmental Protection Act 1986, Part V Division 3

Once completed, please submit this form either via email to info@dwer.wa.gov.au, or to the below postal address:

Department of Water and Environmental Regulation
Locked Bag 10
Joondalup DC WA 6919

Section A – Licence details			
Licence number:	L8190/2007/1	Licence file number:	2012/006884
Licence holder name:	Department of Finance Building Management and Works		
Trading as:	N/A		
ACN:	ABN: 995 933 47728		
Registered business address:	Optima Centre, 16 Parkland Road, Osborne Park, 6017		
Reporting period:	1 / 02 / 2021 to 31 / 01 / 2022		

Section B – Statement of compliance with licence conditions
Did you comply with all of your licence conditions during the reporting period? (please tick the appropriate box)
<input checked="" type="checkbox"/> Yes – please complete: <ul style="list-style-type: none">• section C;• section D (if required); and• sign the declaration in Section F.
<input type="checkbox"/> No – please complete: <ul style="list-style-type: none">• section C;• section D (if required);• section E; and• sign the declaration in Section F.

Section C – Statement of actual production	
Provide the actual production quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual production quantity
66	Not applicable

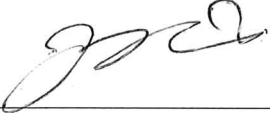
Section D – Statement of actual Part 2 waste discharge quantity	
Provide the actual Part 2 waste discharge quantity for this reporting period. Supporting documentation is to be attached.	
Prescribed premises category	Actual Part 2 waste discharge quantity
66	Not applicable

Section E – Details of non-compliance with licence condition			
Please use a separate page for each condition with which the licence holder was non-compliant at a time during the reporting period.			
Condition no:		Date(s) of non-compliance:	
Details of non-compliance:			
What was the actual (or suspected) environmental impact of the non-compliance? NOTE – please attach maps or diagrams to provide insight into the precise location of where the non-compliance took place.			
Cause (or suspected cause) of non-compliance:			
Action taken to mitigate any adverse effects of non-compliance and prevent recurrence of the non-compliance:			
Was this non-compliance previously reported to DWER?			
<input type="checkbox"/> Yes, and			
<input type="checkbox"/> Reported to DWER verbally		Date: / /	
<input type="checkbox"/> Reported to DWER in writing		Date: / /	

Section F – Declaration

I / We declare that the information in this Annual Audit Compliance Report is true and correct and is not false or misleading in a material particular¹.

I / We consent to the Annual Audit Compliance Report being published on the Department of Water and Environmental Regulation's (DWER) website.

Signature ² :		Signature:	
Name: (printed)	Jodi Cant	Name: (printed)	
Position:	Director General	Position:	
Date:	1/3/2022	Date:	
Seal (if signing under seal):			

¹ It is an offence under section 112 of the *Environmental Protection Act 1986* for a person to give information on this form that to their knowledge is false or misleading in a material particular.

² AACRs can only be signed by the licence holder or an authorised person with the legal authority to sign on behalf of the licence holder.

APPENDIX H

**Extract from Department of Finance Retention and
Disposal Schedule**

Extract from Department of Finance Retention and Disposal Schedule 2018-005 – matters relating directly to the Mount Walton East Intractable Waste Disposal Facility

1	ADVICE	Refer also to General Disposal Authority for State Government Information		
1.2	Advice - File Notification Areas	The Department of Mines and Petroleum (DMP) liaise with Department of Finance regarding any proposed activity around the Mount Walton East Intractable Waste Disposal Facility. The Department of Finance provides advice and suggests conditions for the approval for the third party. The Department of Finance is not advised if any of these conditions are applied to the approval for the third party. The term File Notification Area is used by the DMP for this process.	Destroy	Retain 7 years after date of last action, then Destroy.
2.2	Vesting Orders / Reserve Management Orders	Placing control of reserved Crown Land with the Department (under the Land Administration Act 1997)	Required as State archives	Retain 10 years after action completed, then transfer to the SRO.
3	ACQUISITION/DISPOSAL	Refer also to General Disposal Authority for State Government Information		
3.1	Waste Disposal	Records relating to the disposal of radioactive/chemical/hazardous waste at the Mount Walton East Intractable Waste Disposal Facility. For disposal of other hazardous material e.g. asbestos refer to GDASGI.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
6	COMPLIANCE	Refer also the General Disposal Authority for State Government Information		
6.2	Management System - Mount Walton East Intractable Waste Disposal Facility	Refers to all records relating to the Environmental Health and Safety Management System as it relates to the Mount Walton East Intractable Waste Disposal Facility. The management system is a requirement under the Ministerial Statement and is approved by Environmental Protection Authority. While not certified, the management system does meet the requirements of ISO 9001 Quality Management, ISO14001 Environmental Management System and ISAS/NZS 4801 Occupational Health and Safety Management Systems. The system includes but is not limited to procedures, forms, reference material, meetings, reviews, registers and manuals.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
7	CONSTRUCTION / CAPITAL WORKS SURVEYS	Refer also to General Disposal Authority for State Government Information.		
7.1	Surveys - Significant	Records relating to significant Geological, Geotechnical, Geophysical, Aboriginal and Ethnographical surveys where they are kept separately from the Construction Files e.g. surveys relating to the radioactive site at Mt Walton East.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
		Refer also to General Disposal Authority for State Government Information.		
12	ENQUIRIES	Refer also to General Disposal Authority for Government Records		
12.1	Enquiries - Hazardous Waste Disposal	Enquiries relating directly to hazardous waste disposal at Mt Walton East Intractable Waste Disposal Facility.	Required as State archives	Retain 5 years after date of last action, then transfer to the SRO.
18	LICENCES AND PERMITS	Records relating to licences, permits or registrations issued to or from the Department of Finance.		
18.1	Licences and Permits - Significant	Records relating to significant Licences, Permits or Registrations issued to or from the Department of	Required as State archives	Retain 5 years after expiry of approval, then

		<p>Finance.</p> <p>Such as: Permit to store Nuclear Waste, Licence to operate a landfill facility, Registration to store Radioactive Waste, Radiological Council Registration, Australian <u>Safeguards</u> and Non-proliferation Office Permits, Road Use Permits in relation to the Mount Walton East Intractable Waste Disposal Facility</p> <p>See related Activities:</p> <ul style="list-style-type: none"> • Agreements/Contracts 		transfer to the SRO.
20	MAINTENANCE	Refer also to General Disposal Authority for State Government Information		
20.1	Disposal Cell - Shafts and Trenches	Records relating to the maintenance of Disposal Cells at the Mount Walton Intractable Waste Disposal Facility.	Required as State archives	Retain 5 years after action completed, then transfer to the SRO.
23	MONITORING	<p>Records relating to the activity of monitoring operations and effects of various systems, includes but is not limited to the monitoring of:</p> <ul style="list-style-type: none"> • Groundwater • Capping (process used at Mt Walton East Waste Disposal Facility) • Dust • Rehabilitation • Performance - organisational not personal 		
23.1	Monitoring - Significant	<p>Records relating to monitoring where there may be potential long term impacts on public health and safety, could relate to facility or personnel, e.g. exposure to radiation.</p> <p>Note: Monitoring occurring at the Mt Walton Intractable Waste Disposal Facility is considered significant.</p>	Required as State archives	Retain 5 years after last action, then transfer to the SRO.
27	REPORTING	Refer to General Disposal Authority for State Government Information		
27.1	Reports - Mount Walton East Intractable Waste Disposal Facility	<p>Reports relating specifically to Mount Walton East Intractable Waste Disposal Facility</p> <ul style="list-style-type: none"> • Close-out reports contain details of each specific disposal operation • Performance and Compliance Reports 	Required as State archives	Retain 5 years after date of last action, then transfer to the SRO.
30	OCCUPATIONAL HEALTH AND SAFETY	Also refer to General Disposal Authority for State Government Information		
30.1	Intractable Waste - OHS	Includes but is not limited to: Use, presence, neutralisation and removal, transport, safety precautions; and advice on health risks relating to the radioactive waste site at Mount Walton East	Required as State archives	Retain 5 years after last action, then transfer to the SRO.

APPENDIX I

ASNO Annual Inventory Reporting

From: [ASNO Nuclear](#)
To: [leanne.morton](#)
Subject: RE: ASNO - action required - Physical Inventory Taking (PIT) as at 30 June 2021 - due 5 July 2021 [SEC=OFFICIAL]
Date: Thursday, 1 July 2021 12:41:54 PM
Attachments: [image004.png](#)
[image001.png](#)

OFFICIAL

Dear Leanne,

Thank you. ASNO has received your PIT report confirming nil nuclear material (other than the nuclear material that has been buried since before 2010).

Best regards,
Kalman

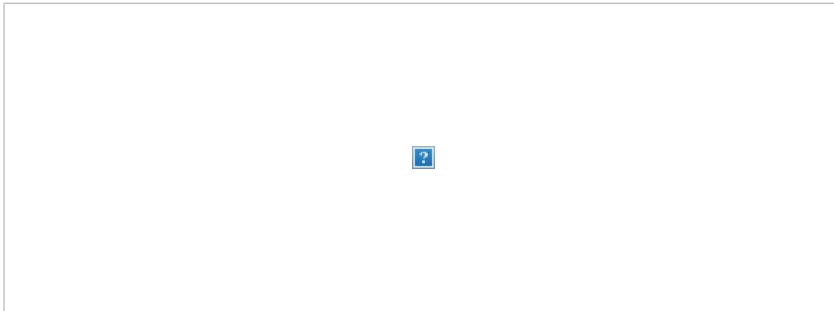
From: leanne.morton <leanne.morton@auroraenvironmental.com.au>
Sent: Thursday, 1 July 2021 2:31 PM
To: ASNO Nuclear <nuclear.asno@dfat.gov.au>
Subject: [EXTERNAL] RE: ASNO - action required - Physical Inventory Taking (PIT) as at 30 June 2021 - due 5 July 2021 [SEC=OFFICIAL]

CAUTION: This email originated from outside the organisation. Do not click links or open attachments unless you recognise the sender.

Thank you Kalman, I have now completed the reporting.

Cheers

Leanne



From: ASNO Nuclear <nuclear.asno@dfat.gov.au>
Sent: Thursday, 1 July 2021 12:26 PM
To: leanne.morton <leanne.morton@auroraenvironmental.com.au>
Cc: Kalman Robertson <Kalman.Robertson@dfat.gov.au>
Subject: RE: ASNO - action required - Physical Inventory Taking (PIT) as at 30 June 2021 - due 5 July 2021 [SEC=OFFICIAL]

OFFICIAL

Dear Leanne,

Thank you for writing. You are correct that there is no “download inventory checklist” button for Department of Finance (Western Australia) - IWDF (Permit PN207) to click on. Currently, the inventory list for Department of Finance (Western Australia) - IWDF (Permit PN207) is blank in the NUMBAT database. The inventory list would normally appear in the box under the heading “Material balance area”. The reason for the blank list is that as of 30 June 2020, Department of Finance had declared that it did not have any nuclear material other than the nuclear material that has been buried in shafts and trenches since before 2010. The items of nuclear material that were buried before 2010 are not listed in the NUMBAT database and we are not asking Department of Finance to add them to the NUMBAT database.

We ask Department of Finance to complete a physical inventory taking each year on any nuclear material that has been received, stored or disposed of at the IWDF in the previous 12 months. If the IWDF has not received, stored or disposed of any nuclear material in the last 12 months and the IWDF does not have any nuclear material (other than the material that has been buried since before 2010), then please leave the inventory list blank in the NUMBAT database. **Please click “Complete Physical Inventory Taking” to confirm that there have been no movements of nuclear material in FY2020-2021 and IWDF has no nuclear material (other than the nuclear material that has been buried since before 2010).** This will record the fact that Department of Finance’s inventory has not changed in the last year.

Best regards,
Kalman

From: nuclear.asno@dfat.gov.au
To: leanne.morton; Savage-Jones, Emma; IWDF-Mount Walton; Ng, Sze-Wan; stuart.parr; nuclear.asno@dfat.gov.au
Subject: Report on Physical Inventory Taking submitted on 3 Jun 2022 for Minister for Works c/- Department of Finance (Western Australia) - Intractable Waste Disposal Facility (IWDF), Mt Walton East by stuart.parr@auroraenvironmental.com.au [SEC=OFFICIAL:Sensit...
Date: Friday, 3 June 2022 1:14:04 PM
Attachments: [Finalised Physical Inventory for Dept Finance \(WA\) at 03Jun2022 151307.xlsx](#)

This email acknowledges that a contact for your organisation has logged into the NUMBAT database (<https://numbat.dfat.gov.au>) and clicked the “Complete Physical Inventory Taking” button, submitting the inventory list of nuclear material for your organisation as of 30 June 2022.

You are receiving this email because you are listed as a primary contact for your organisation. The Australian Safeguards and Non-Proliferation Office (ASNO) will review your submission and contact you if it has any questions.

For reference, attached is a copy of your organisation’s inventory list as reported by your organisation today. If you have any questions, please contact nuclear.asno@dfat.gov.au.

APPENDIX J
ASNO ASO316 Report

From: [Ng, Sze-Wan](#)
To: nuclear.asno@dfat.gov.au
Cc: [Hopkins, Eleanor](#); [Leanne Morton](#)
Subject: Permit Number PN207 - Submission of ASO316 form - 2022
Date: Wednesday, 2 March 2022 1:40:40 PM
Attachments: [image001.png](#)
[image002.png](#)
[20220301 ASNO - ASO316 Form - Description of Buildings.pdf](#)
[20220301 Attachment 1 - Regional Location.pdf](#)
[20220301 Attachment 2A - IWDF Site Detail.pdf](#)
[20220301 Attachment 2B - Waste Disposal Locations.pdf](#)

Good afternoon,

Please find attached the completed ASO316 Form and relevant site maps in PDF format for permit number PN207.

- The information provided in the ASO316 Form has not changed since the 2021 submission.
- The maps also remain unchanged except for Attachment 2B – Waste Disposal Locations which has been updated to include disposal cell 2020NRT01. Please note that this is *not* a radioactive waste disposal cell.

There has been no disposal of nuclear material in the reporting period, with the last disposal containing nuclear material occurring in 2008.

If you have any questions, please do not hesitate to contact me.

Kind regards,

Sze-Wan Ng Contract Manager

Regional Operations, Buildings and Contracts

Djookanup, 16 Parkland Road, Osborne Park WA 6017

Phone 6551 1457 **Email** sze-wan.ng@finance.wa.gov.au **Web** WA.gov.au



Acknowledgement of Country The Government of Western Australia acknowledges the traditional custodians

of Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of Aboriginal communities and their cultures; and to Elders both past and present.

APPENDIX K

2021 – 2022 CLC Meeting Minutes

Intractable Waste Disposal Facility (IWDF), Mount Walton East Community Liaison Committee (CLC) Meeting Minutes

Final Rev 1

Chairperson:	Eleanor Hopkins	Date & Time:	14 October 2021 10.05 am – 11.19 am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
		Meeting No.	2021/22 Meeting 1

Attendees:		
Suzie Williams	(SW)	Coolgardie Community Representative
Tracey Rathbone	(TR)	Deputy President, Shire of Coolgardie
Jan McLeod	(JMcl)	Coolgardie Community Representative
David Williams	(DW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Bryan Close	(BC)	Deputy President, Shire of Yilgarn
Shane Chambers	(SC)	Executive Manager Regulatory Services, Shire of Yilgarn,
Eleanor Hopkins	(EH)	IWDF Project Director, Department of Finance (Chairperson)
Sze-Wan Ng	(SN)	IWDF Contract Manager, Department of Finance
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
Leanne Morton	(LM)	IWDF FMC Project Manager

Apologies		
Abnesh Chetty	(AC)	Environmental Officer – Licensing, Department of Water and Environmental Regulation
Anna Killigrew	(AK)	Coolgardie Community Representative
Peter Harrison	(PH)	Coolgardie Community Representative
Lynn Webb	(LW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Mal Cullen	(MC)	President, Shire of Coolgardie
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
James Trail	(JT)	CEO, Shire of Coolgardie

Observers
Clive Young, Facilities Manager Tellus Holdings Pty Ltd John Williams, Community observer

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>EH declared the meeting open at 10.05 am.</p> <p>EH acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>EH introduced herself and welcomed all committee members and observers. EH advised that observers were not able to participate in the meeting, however, would have an opportunity to ask questions at the conclusion of item 6.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p> <p>LM advised that Anna Killigrew and Peter Harrison have resigned from the CLC for personal reasons and will not be attending any further meetings. LM acknowledged Anna and Peter's passion, valuable contributions and attendance over their years of membership and this sentiment was shared by the Committee.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p>	
4.0	<p>Previous Minutes</p> <p>EH stated that the draft minutes for the previous meeting held on the 10th of June 2021 were distributed within the two-week timeframe in accordance with the CLC Terms of Reference and Operating Guidelines (CLC ToR).</p> <p>JMcL requested that the following amendments be made to the 10th of June 2021 (draft 0.2) minutes:</p> <ul style="list-style-type: none"> - Correct the spelling of Lynn Webb's name; - Correct Nic Warren's initials in the attendees list; - In section 9.3, it states 'JMCL stated Brendan had committed to providing information about the condition of the road and would this continue under the new manager?' JMCL advised that this was not what she had asked and that her question referred to the 24th of June 2020 minutes where Brendon Atkinson agreed that if aspects of the Road Use Agreement are modified for any reason that this is reported to the CLC. 	<p>LM will amend the 10th of June 2021 minutes and distribute them as another draft version to the CLC for approval at the next CLC meeting.</p>

	<p>JMcL also noted that the year was incorrectly recorded as 2020 on the 1st of April 2021 minutes.</p> <p>LM advised that the incorrect date had been noted and corrected and an updated version of the April 2021 minutes had been emailed to the CLC on the 12 October 2021. LM provided a hardcopy of the updated April 2021 minutes to JMcL during the meeting.</p>	
5.0	<p>Business Arising from Previous Minutes</p> <p>5.1 Confirm proponent’s commitment to providing information about modification to the Road Use Agreement</p> <p>EH noted that this item had been discussed in 4.0 Previous Minutes and that no modifications have been made to the Road Use Agreement with Tellus Holdings.</p> <p>5.2 Update on the Access Road Railway Crossing upgrade.</p> <p>MS advised that the railway crossing works had been completed and that this included approximately half a kilometre of tarmac on either side of the crossing, boom gates and a manned office by the railway.</p> <p>MS spoke to Arc personnel working on the crossing who advised that regular cleaning of iron ore dust would be required to prevent any impact on the operation of the railway signals. TR asked whether the cleaning of iron ore dust was a shared responsibility with Finance. MS advised that it was not.</p> <p>MS noted that the area surrounding the crossing was in good condition.</p> <p>5.3 CLC visit to the IWDF</p> <p>EH noted JMcL’s request for an IWDF site visit during the 10th of June 2021 CLC meeting and advised that Finance had investigated whether it would be possible to conduct a site visit for the CLC in October 2021. It was decided that this would not be an ideal time due to high vehicle volumes and road works taking place on the IWDF Access Road.</p> <p>EH also stated that it was not possible to have CLC meetings at the IWDF as public observers are not covered by the Department’s insurance and would therefore not be able to travel to the IWDF. A site visit in May 2022 will be further investigated as it is believed that the weather would be too hot in February 2022.</p> <p>JMcL commented that there was a large CLC meeting at the IWDF site in 2013 and questioned why public observers were not able to attend the site.</p> <p>TR commented that there had been a lot of belt tightening in recent years which may explain why CLC meetings could no longer be held on site.</p>	<p>Finance to further investigate a site visit to the IWDF in May 2022 and provide the CLC with an update when more details are finalised.</p>

	<p>EH explained that the Ministerial Statement is very clear about the requirement to allow public observers at CLC meetings.</p> <p><i>(Post meeting amendment: EH clarified that she had intended to reference the CLC Terms of Reference and Operational Guidelines instead of the Ministerial Statement.)</i></p> <p>JMcL asked whether public observers could attend a meeting at the IWDF if they had their own insurance. EH explained that this would not be acceptable, and government has duty of care of visitors to the IWDF. EH reiterated that the Departmental insurance only covers CLC members.</p> <p>LM added that there is also an issue with control as observers have attended CLC meetings without notice and it would not be acceptable to have public observers use the IWDF Access Road without notification.</p> <p>EH referred to JMCL's point about the 2013 CLC meeting at the IWDF site and asked whether there were public observers at that meeting. LM advised that the last CLC meeting held at the IWDF was in 2015 and, although not technically observers at the meeting, three people accompanied Anna Killigrew to the IWDF.</p> <p>JMcL stated that a site visit was long overdue. EH commented that she believed a site visit would be beneficial.</p> <p>5.5 Management Review Meeting – Section 6.4 of previous Minutes</p> <p>JMcL commented that the Management Review Meeting (MRM) minutes should be automatically circulated to all CLC members so that any questions or comments can be raised at the next CLC meeting. In the 10th of June 2021 meeting, it was recorded that the MRM minutes would be provided to CLC members upon request.</p> <p>JMcL reiterated that she believed that circulation of the MRM minutes should be automatic. EH said that this was fine and confirmed that the minutes would be circulated via email to all CLC members, and a hardcopy mailed to JMCL.</p>	<p>Finance to circulate December MRM minutes to all CLC members.</p>
6.0	<p>Management of the IWDF</p> <p>6.1 IWDF Safety Assessment and Safety Case</p> <p>LM advised that work on the safety assessment and case was put on hold following ARPANSA's feedback as the Radiological Council of Western Australia (RCWA) had not yet provided their input. LM reported that a meeting was held with RCWA on the 30th of September 2021 and RCWA indicated their approval of the proposed approach. Work will begin in earnest over the next 12 months.</p>	

The timeframe for completion of the safety case and assessment is June 2022 to allow sufficient time for the RCWA time to review the documentation prior to the renewal due date for RCWA Registration in February 2023.

TR wanted to clarify whether this approach would satisfy all current requirements. LM advised that Aurora has completed a gap analysis of the old and new codes of practice – RHS No.35 (1993) and RPS C-3 (2018), respectively – to understand where gaps exist. Work is currently being undertaken to improve existing information and supplement sections where gaps may exist under the new code. LM noted that the IWDF safety assessment and case were prepared in 2016, prior to the release of the new code. These documents were submitted to ARPANSA and feedback was received four years after submission.

LM advised that Stuart Parr (Radiation Safety Officer) has a clear understanding of the requirements for the safety assessment and case.

TR thanked LM for her response.

6.2 2020 – 2021 PCR

LM provided an update on the 2020-21 Performance and Compliance Report (PCR) and advised that RCWA was required to provide feedback in relation to the public waste data spreadsheet before the PCR could be finalised.

LM advised that Finance cannot release this information to the public without approval from ASNO and RCWA. ASNO have indicated their satisfaction with the information.

Aurora will meet with RCWA next week to finalise the spreadsheet which will allow the PCR to be finalised.

6.3 DWER Licence Renewal

LM reported that the DWER Licence renewal will be ready to submit soon, prior to the mid-November deadline.

LM advised that the new licence renewal form does not have a field where changes to the Conditions of Licence can be requested. LM noted the CLC's request to change the notification period from 3 months to 28 days at the next licence renewal. Under the new licence renewal process, this change will be requested after DWER receives the renewal form and issues a draft set of licence conditions to Finance for comment.

6.4 Training

LM reported that IWDF background and management system training was completed for Eleanor Hopkins and Sze-Wan Ng on the 26th of July 2021.

	<p>EH advised the CLC that she will eventually take over the IWDF Project Director role from Emma Savage-Jones.</p> <p>6.5 Compliance Auditing 2020/2021</p> <p>LM stated that no auditing has taken place since the last CLC meeting so there was nothing to report to the CLC.</p> <p>6.6 Questions from Observers</p> <p>EH asked whether the observers had any questions about the operation of the IWDF at this point. The observers did not have any questions.</p>	
7.0	<p>CLC Terms of Reference and Operational Guidelines</p> <p>7.1 Proposed Changes to Section 2.6 of Operational Guidelines</p> <p>EH advised that section 2.6 of the CLC Operational Guidelines currently states that, "On occasion, especially during a waste disposal operation, meetings may be held at the IWDF."</p> <p>Given the constraints in using the access road, practicalities of holding a meeting at the IWDF, and the requirement for CLC meetings to allow public observers – who are not covered by the Department's insurance – EH proposed that the wording be changed to, "On occasion, especially during a waste disposal operation, the CLC may request a visit to the IWDF."</p> <p>TR moved the action. DW seconded.</p> <p>TR commented that a significant amount of time had been spent developing the CLC ToR and acknowledged the time and contributions of all CLC members and Finance.</p>	<p>Finance to amend the CLC Operational Guidelines as per the discussion and distribute an updated version to all CLC members.</p>
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>LM reported that two general radioactive enquiries had been received since the last meeting.</p> <p>8.2 Waste Acceptance Applications</p> <p>LM reported that no waste disposal applications have been assessed and passed on to Finance since the last CLC meeting.</p>	
9.0	<p>General Business</p> <p>9.1 Notification to EPA regarding CLC meeting frequency</p> <p>EH noted that a discussion regarding the frequency of CLC meetings took place at the CLC meeting on the 8th of December 2020. A number of CLC members had expressed a preference for three or two meetings per year, whilst others preferred to keep it at four per year.</p>	<p>Finance to commence the process to reduce the CLC meeting frequency from a minimum of four to a minimum of three meetings per year.</p>

	<p>EH invited the CLC members to provide comment.</p> <p>TR recalled that three meetings per year was proposed at the December meeting, with the CLC able to request additional meetings as required. TR noted that, at present, there is little activity regarding the IWDF and CLC meetings have generally involved reporting from Finance.</p> <p>EH proposed that CLC meetings be held in February, June, and October each year.</p> <p>JMcL stated that Ministerial Statement 562 requires the CLC to meet a minimum of four times per year and that this has been a condition since the establishment of the IWDF and the CLC. JMcL commented that, historically, this requirement has not always been met.</p> <p>JMcL proposed that the Ministerial Statement should not be altered but the meeting frequency should be decided by the CLC. EH and LM commented that this approach would still result in non-compliance with the Ministerial Statement unless the EPA have approved a reduced meeting frequency.</p> <p>LM advised that a Section 46 would need to be submitted to request a change to the Ministerial Statement conditions. LM commented that, in 2011, a letter was sent to the Environmental Protection Authority (EPA) requesting approval to reduce the number of CLC meetings to once per year, unless otherwise requested by the CLC. This was approved by the EPA but is no longer valid as the CLC has subsequently requested an increase in the number of meetings.</p> <p>LM noted that to avoid a non-compliance with Ministerial Statement 562, Finance could submit a request to the EPA, if there is CLC agreement, to reduce the number of meetings to three per year.</p> <p>LM noted that, up until recently, four CLC meetings were held per year.</p> <p>JMcL agreed to three meetings per year with the CLC able to request additional meetings as required.</p> <p>TR moved that Finance submits a request to the EPA to amend the number of meetings to three meetings per year. DW seconded.</p> <p>9.2 IWDF Information Handbook Version 16</p> <p>LM advised that the IWDF Handbook had been updated to Version 16 and published to the IWDF webpage on WA.gov. The following updates were made:</p> <ul style="list-style-type: none"> - Capitalisation and minor wording amendments; - Insertion of a new IWDF Governance Structure on page 10; 	
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- Insertion of correct rehabilitation monitoring photo for 2020 Photo Point Location 3 on page 29;
- Correction of radioactive shaft name from 92RS02 to 94RS01. The shaft was excavated in 1992 but disposal did not occur until 1994; and
- Updated Glossary and abbreviations section.

No changes have been made to the IWDF Brochure.

SN commented that hardcopies of the IWDF Handbook and Brochures were available after the meeting. TR indicated that she would like a copy of the IWDF Handbook. JMCL also received a hardcopy of the updated handbook.

9.3 Virtual option for CLC meetings

TR noted the impacts of COVID-19 on the way meetings were held. Given the use of virtual meeting technologies in CLC meetings, TR questioned whether this needed to be embedded into the CLC ToR.

EH responded that having a video call option would likely be retained going forward as it increases the accessibility of CLC meetings. This does not need to be added to the CLC ToR. LM agreed.

LM commented that virtual meeting options could be offered to public observers and that the meeting link could be included in the CLC meeting advertisement. EH raised that there could be concerns with the amount of traffic on the video call but noted that this concern should not impede a trial being undertaken.

SW raised that the appropriateness of having public observers on Microsoft Teams may need to be considered. SW suggested that livestreaming the meeting may be more suitable.

TR commented that the Shire of Coolgardie has utilised Zoom for their own meetings and that this has enabled greater inclusion of meeting attendees.

EH noted that sound quality was a concern but agreed that virtual meeting options should be investigated.

9.4 CLC Membership

DW wished to recognise Anna Killigrew and Peter Harrison's contributions to the CLC. All CLC members agreed. DW noted that Anna and Peter's local knowledge had always been a valuable contribution to the CLC.

LM stated that these minutes would be shared with Anna and Peter and the CLC's recognition of their work recorded in the minutes.

EH asked how many CLC member vacancies were open. LM responded that there were the following vacancies:

Finance to investigate virtual meeting options for public observers of CLC meetings and present to the CLC at the next meeting.

	<ul style="list-style-type: none"> - Two Coolgardie Community Representatives; and - Two local community representatives from the Shires of Yilgarn and Menzies and City of Kalgoorlie Boulder. <p>Vacancies will be advertised along with the next CLC meeting advertisement.</p> <p>TR asked whether there is a lawful number of seated members required. JMcl and LM responded that there was not, and a quorum is not specified in the CLC ToR. LM advised that a quorum was previously included in the CLC ToR but was removed as it meant that meetings could not be held if there was no quorum, making it difficult to satisfy the Ministerial Statement condition. The CLC members understood the practical reasons for removing this requirement.</p> <p>9.5 IWDF Budget</p> <p>DW asked whether Finance had a budget for the IWDF and how much this was. EH responded that there was a budget and took the second question on notice. Finance will report back to the CLC at the next meeting regarding the budgeted amount.</p> <p>DW commented that there should be flexibility in the budget to adapt to changing needs. EH advised that the budget was flexible.</p> <p>9.6 Weather reports</p> <p>JMcL commented that the CLC used to receive weather reports from the IWDF weather station but noted that she did not believe this station is functional at present and this was confirmed by MS. JMcl asked if weather reports could be provided by Tellus. JMcl commented that she had documents of past weather reports and believed that this was an important aspect to monitor given climate change.</p> <p>TR commented that Tellus' weather reports may be available through the Bureau of Meteorology (BOM). LM and MS advised that previous weather reports from the IWDF had been provided by BOM but the station is now disused.</p> <p>MS commented that he could communicate with Tellus regarding their weather reports.</p> <p>9.7 Infrastructure</p> <p>MS reported that a new generator and a double skinned fuel tank has been purchased and installed at the IWDF.</p> <p>TR asked what sort of physical presence is out at the IWDF. MS responded that visits are usually conducted twice a year, in April and October, for monitoring works, and additional visits are conducted as required such as the installation of site infrastructure or when there is a disposal operation. MS noted that the site is in good condition.</p>	<p>Finance to report the IWDF budget amount to the CLC at the next meeting.</p> <p>MS to ask Tellus how they obtain their weather reports .</p>
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	<p>9.8 Performance and Compliance Report</p> <p>JMcL asked about the 2020-21 PCR being finalised and when the CLC would have an opportunity to review the 2021-22 PCR. LM advised that the 2021-22 PCR would not be prepared until July 2022. LM commented that she would be happy to send the draft 2020-21 PCR to the CLC members upon request. LM noted that the 2020-21 PCR had already been reviewed by the Department of Finance.</p>	
10.0	<p>Close / Scheduling of Next Meeting</p> <p>EH advised that the next CLC meeting was scheduled for the 10th of February 2022.</p> <p>TR commented that this follows the quiet period over December and January and asked whether there would be anything of note to discuss. LM responded that the safety case and assessment would likely be further progressed at this time and could be provided as reading to the CLC prior to the February meeting. The Management Review Meeting (MRM) is also scheduled for December and the minutes can be distributed to the CLC for feedback and comment during the meeting.</p> <p>All CLC members agreed to have the next CLC meeting on the 10th of February 2022.</p> <p>10.1 The next CLC meeting is scheduled for 10th of February 2022.</p> <p>EH closed the meeting at 11.19 am.</p>	

Intractable Waste Disposal Facility (IWDF), Mount Walton East Community Liaison Committee (CLC) Meeting Minutes

Final Rev 1

Chairperson:	Eleanor Hopkins	Date & Time:	10 February 2022 10.00 am – 11.26 am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Microsoft Teams
		Meeting No.	2021/22 Meeting 2

Attendees:		
Eleanor Hopkins	(EH)	IWDF Project Director, Department of Finance (Chairperson)
Sze-Wan Ng	(SN)	IWDF Contract Manager, Department of Finance
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
Leanne Morton	(LM)	IWDF FMC Project Manager
Jan McLeod	(JMcl)	Coolgardie Community Representative
Suzie Williams	(SW)	Coolgardie Community Representative
David Williams	(DW)	Community Representative – Western Australian community outside the Shires of Coolgardie, Menzies and Yilgarn
James Trail	(JT)	CEO, Shire of Coolgardie
Tracey Rathbone	(TR)	Deputy President, Shire of Coolgardie
Shane Chambers	(SC)	Executive Manager Regulatory Services, Shire of Yilgarn
Brian Joiner	(BJ)	CEO, Shire of Menzies

Apologies		
Lynn Webb	(LW)	Community Representative – Western Australian community outside the Shires of Coolgardie, Menzies and Yilgarn
Mal Cullen	(MC)	President, Shire of Coolgardie
Bryan Close	(BC)	Deputy President, Shire of Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
Abnesh Chetty	(AC)	Environmental Officer – Licensing, Department of Water and Environmental Regulation

Observers
Clive Young, Facilities Manager, Tellus Holdings Pty Ltd Rhonda Evans, Community observer John Williams, Community observer

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>EH declared the meeting open at 10.02 am.</p> <p>EH acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>EH introduced herself and welcomed all committee members and observers. EH advised that observers were not able to participate in the meeting, however, would have an opportunity to ask questions at the conclusion of item 6.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves, providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p> <p>EH asked the CLC if there were any objections to the meeting being recorded for minute-taking purposes. There were no objections. EH commenced recording of the meeting through Microsoft Teams.</p>	
4.0	<p>Previous Minutes</p> <p>EH stated that the draft minutes for the previous meeting, held on 14 October 2021, were distributed within the two-week timeframe in accordance with the CLC Terms of Reference and Operational Guidelines (CLC ToR).</p> <p>EH noted that minor amendments had been made to the October 2021 and June 2021 meeting minutes and the updated versions distributed to the CLC prior to the meeting. EH asked if there were any further amendments.</p> <p>JMcL requested that the following amendments be made to the June 2021 minutes:</p> <ul style="list-style-type: none"> - Under item 4.0, amend “meetings” to “minutes” in the last sentence. - Under item 6.5, amend “bought” to “brought”. - Under item 8.2, in paragraph 14, amend “DEC” to “DEP” where it appears twice. <p>Regarding the October 2021 minutes, JMcL expressed that the way her amendment to item 9.3 of the June 2021 minutes was recorded no longer made sense given that these minutes had since been amended.</p> <p>JT interjected to suggest that JMcL could provide the remainder of her amendments to Finance outside of this meeting and the amended minutes reviewed at the next meeting. TR suggested that minor amendments such as spelling and grammar could be conveyed via phone or email prior to meetings.</p> <p>In response to JMcL’s query, LM suggested that the October 2021 minutes be amended to indicate that JMcL’s amendment was in relation to draft version 0.3 of the June 2021 minutes.</p>	<p>Finance to amend the 10 June 2021 and 14 October 2021 minutes and distribute to the CLC.</p>

	<p>TR moved to accept the June 2021 and October 2021 minutes subject to the inclusion of JMCL's amendments. DW seconded.</p>	
<p>5.0</p>	<p>Business Arising from Previous Minutes</p> <p>5.1 CLC Visit to the IWDF</p> <p>EH advised that a Briefing Note had been submitted to her General Manager to request a site visit by the CLC to the IWDF. The General Manager declined to consider any visit to the IWDF whilst the current COVID environment persists.</p> <p>JMcL asked what changes to the COVID situation were required before a site visit could be conducted. EH responded that she could not provide a response due to future uncertainties regarding the COVID environment.</p> <p>Finance will advise the CLC when the site visit may be reconsidered.</p> <p>5.2 Updated CLC Terms of Reference and Operational Guidelines</p> <p>EH reported that section 2.6 of the CLC Terms of Reference and Operational Guidelines (CLC ToR) had been amended to "On occasion, especially during a waste disposal operation, the CLC may request a visit to the IWDF." An updated version was sent to all CLC members.</p> <p>EH suggested removing "especially during a waste disposal operation" as it would be unlikely for a site visit to be approved during this time due to safety concerns.</p> <p>JMcL objected to this and advised that she has visited the site during a disposal operation. JMCL expressed that it was important for the CLC to have the opportunity to visit the site to gain first-hand knowledge of the site.</p> <p>TR suggested that the wording could be amended to, "The proponent may invite CLC members to visit the site where they deem appropriate." TR added that there are a number of governing issues that would have to be managed to enable a visitation to occur and that the decision was not solely dependent on Finance. TR also reminded the CLC that they are a liaison group and not a determining body as has been made clear in the review of the CLC ToR.</p> <p>EH commented that the intent behind her suggestion was to manage expectations as the proponent may be disinclined to have members of the public on site during a disposal operation.</p> <p>LM reported that site visits during disposal operations have occurred in the past and, from the Facility Management Contractor (FMC) viewpoint, can be managed safely.</p> <p>TR stated she would not support a site visit unless there was a minimum number of CLC members attending as significant preparation and travel time would be required.</p> <p>JMcL reiterated that the CLC was formed as an adjunct to the facility, with Finance being the proponent, therefore the operation of the IWDF should run in line with the operation of the CLC. She also expressed that she did not believe it was Finance's decision to approve or reject a site visit but the decision of the CLC.</p> <p>EH recognised the importance of the CLC in the management of the IWDF, however, the government owns the facility, the road and the insurance that covers the CLC during a site visit, therefore, the decision for a site visit ultimately rests with Finance.</p>	

SW asked whether CLC members were able to speak freely in public regarding the facility. EH responded that CLC members are also members of the public and are welcome to approach their local members or speak in the public sphere. EH stated that the role of the CLC is to disseminate information to the community about how the IWDF is being managed and operated.

TR drew the Committee's attention to section 1.3 *Terms of Reference* of the CLC ToR and suggested that the Committee should reflect on the points listed.

EH stated that there would be no change to the wording in section 2.6 of the CLC ToR.

5.3 Virtual option for public observers of future CLC meetings

Under item 9.3 of the October 2021 minutes, it was agreed that Finance would investigate virtual meeting options for public observers.

SN reported on the virtual options she had investigated.

The recommended option is to allow public observers to join via a Microsoft Teams meeting with added security controls. As per the current process, interested attendees should contact SN who will send them the meeting link if they advise that they would like to join the meeting virtually.

Added security controls will:

- require guests to wait in a virtual lobby before being admitted into the meeting;
- only allow the meeting host to share their screen;
- allow the meeting host to mute guests;
- allow the meeting host to disable guests' microphones and cameras; and
- allow the meeting host to remove guests from the meeting if required.

Additionally, guests are unable to record the meeting through Teams.

Other options explored were Microsoft Teams Live Events and Youtube Livestream, however, these were found to be unviable as they did not enable effective two-way communication.

The CLC were satisfied with the recommended option.

5.4 Report to the CLC on the annual Finance IWDF budget

At the October 2021 meeting, under 9.5 IWDF Budget, DW asked about the budget for the IWDF.

EH reported that the two budget items that are set include the FMC cost and the rehabilitation provision.

The provision for environmental and operational management of the IWDF by the FMC is \$260,000 for the 2021/2022 financial year.

The value of the rehabilitation provision for the IWDF, as of 30 June 2021, as shown in the Department of Finance's annual report is \$654,000.

If there are other items required to manage or operate the IWDF throughout the year, these are sought on an as required basis.

5.5 Weather reports for the IWDF

MS contacted Michael Ingram from Tellus who confirmed that Tellus collect data from their onsite weather station. This data is uploaded to the cloud and the

	<p>company who installed the weather station produces a report which is provided to Tellus. This information is not sent to the Bureau of Meteorology and is not publicly available.</p> <p>Any individuals who wish to pursue this information can contact Tellus in their private capacity.</p> <p>JMcL asked whether the FMC would access Tellus' weather reports for travel on the IWDF road. MS advised that he does not require access to Tellus' weather data for travel on the IWDF road.</p>	
6.0	<p>Management of the IWDF</p> <p>6.1 IWDF Safety Assessment and Safety Case</p> <p>LM reported that the approach to the Safety Assessment and Safety Case has been agreed with the Radiological Council of Western Australia (RCWA). Stuart Parr, the Radiation Safety Officer (RSO) for the IWDF, is working on updating the Operational Safety Assessment and Safety Case. He has also started developing a Closure Safety Assessment and Safety Case which will be submitted to the RCWA for approval later in the year.</p> <p>6.2 IWDF Waste Inventory Database</p> <p>LM reported that the FMC met with Duncan Surin from the Radiation Health Unit (RHU), a unit of the RCWA, to discuss the discrepancies in the way radioactive material was reported in the early years of the IWDF's operations. The FMC and RHU came to an agreement regarding what should be reported, recognising that there were some issues with the information contained within the RHU store database. RHU have decided to archive their store database and RCWA will use the IWDF Waste Inventory Database as its new database for information regarding waste at the IWDF.</p> <p>6.3 2020 – 2021 PCR</p> <p>LM reported that the finalisation of the 2020-2021 PCR has been delayed as RCWA have yet to provide feedback on the public waste spreadsheet produced from the IWDF Waste Inventory Database. The FMC followed up with RCWA at the end of last year and will continue to follow up with them until their feedback is received.</p> <p>JMcL asked when the 2020-2021 PCR would be available to the CLC. LM responded that if she does not receive feedback from RCWA by the end of February, she will amend the PCR to reflect this. The CLC can then expect to view a draft version of the PCR around the end of February/early March.</p> <p>6.4 DWER Licence Renewal</p> <p>A licence renewal application was submitted to the Department of Water and Environmental Regulation (DWER) on 16 November 2021. The application is now being assessed by DWER and may take up to six months. Subsequently, DWER have extended the current licence expiry for six months to 17 August 2022.</p> <p>6.5 Questions from Observers</p> <p>EH asked whether the observers had any questions about the operation of the IWDF at this point.</p> <p>The observers did not have any questions.</p>	

7.0	<p>CLC Terms of Reference and Operational Guidelines</p> <p>7.1 Finalisation of meeting minutes</p> <p>EH commented that the current process of finalising CLC meeting minutes was protracted and proposed that minutes are amended and finalised prior to the next CLC meeting to allow them to be endorsed at the next meeting.</p> <p>TR agreed that the finalisation of minutes was time-consuming and supported EH's proposal. TR suggested that any amendments should be submitted by the end of the month that the CLC receive the minutes in.</p> <p>EH reiterated that the proposal would see the minutes distributed to the CLC within two weeks of the CLC meeting and would allow a further period of two weeks for amendments to be submitted. An updated revision including all amendments would be distributed to the CLC prior to the next meeting and endorsement of this revision would be discussed at the next meeting. EH asked whether this proposal was supported.</p> <p>LM questioned how the proposed process differed from the current process and commented that she did not think it would make a difference. EH responded that currently, amendments to the minutes are not provided until the next meeting which often results in endorsement of the meeting minutes not being possible until two meetings later.</p> <p>JMcL agreed with LM, stating that under the current process, amendments could be provided prior to the next meeting and the minutes endorsed at the next meeting. JMCL noted that there had previously been issues regarding the CLC not receiving the minutes from Finance in a timely manner. She reiterated that the minutes needed to be endorsed at the next meeting which she stated is currently occurring.</p> <p>JMcL also expressed that the virtual meeting format made it difficult for her to follow the meeting. EH sympathised with JMCL and recognised that it was not a normal way of communication but that it was necessary in the current situation.</p> <p>EH explained that she did not want the CLC to have to continue revisiting minutes from several months ago.</p> <p>JMcL stated that if the current process was followed, she did not see a need to change the process of endorsing CLC meeting minutes.</p> <p>TR shared that she is involved in a number of different spaces but the CLC is the only one in which minutes are not endorsed in a timely manner. She expressed her frustration at the protraction whilst recognising the importance of having a true and accurate record of the meeting. She noted that it was more important to accurately capture the intent of statements rather than focusing on spelling or grammatical errors.</p> <p>LM commented that the October 2021 minutes still need to be amended. EH agreed and recognised that they would have to be amended and finalised at the following meeting.</p> <p>LM stated that she understood the frustration shared by most of the committee but explained that the minutes of the CLC meetings must be kept for a minimum of 100 years under the recordkeeping requirements for the IWDF. Therefore, it is important that, as public records, the minutes are correct. LM stated that where</p>	
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	<p>opinions differ as to what occurred during a meeting, a discussion amongst the whole Committee is required to decide what to record.</p> <p>EH commented that she agreed with TR regarding the intent of the minutes. LM stated that intent could be interpreted differently by different parties. EH agreed but noted that the majority of amendments raised do not have a material effect. EH also noted that the inability to finalise meeting minutes in a timely manner delayed related operational and management actions such as submitting the Section 45C request to reduce the CLC meeting frequency from a minimum of four meetings to a minimum of three meetings per year.</p> <p>JMcL stated that, in the past, a letter had been sent requesting a reduction in the number of CLC meetings and that permission had been granted without changing the Ministerial Statement. EH responded that advice had been received that a letter was no longer sufficient. JMcL asked where this advice had been received from as it would involve changing the Ministerial Statement. EH responded that the Ministerial Statement had not been changed and that this would not be possible until the October 2021 minutes were finalised.</p> <p>JT commented that, in local government, Council meetings minutes were finalised by seeking amendments and having attendees accept the minutes as a true and accurate record through a vote. He noted that a substantial amount of time had been spent focusing on wording changes and punctuation amendments to previous minutes. JT asked about the relevance of the CLC meeting minutes and who the minutes are provided to. EH responded that they go to the CLC and then become a part of the State's records.</p> <p>SW recognised that a significant amount of time had been spent discussing previous minutes and suggested that this would be less of an issue moving forward if CLC meetings are recorded as the current meeting was. SW recognised that it may take some time to correct past minutes but commented that the minutes of this meeting could be easily corrected with the aid of the recording.</p>	
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>LM reported that several waste enquiries had been received since the last meeting.</p> <p>8.2 Waste Acceptance Applications</p> <p>LM reported that one waste acceptance application had been received since the last CLC meeting. This application has been considered by the RSO and a report produced, however, it has not yet been forwarded to Finance.</p>	
9.0	<p>General Business</p> <p>9.1 Expression of Interest</p> <p>SN reported that an Expression of Interest (EOI) had been received from Rhonda Evans to become a community representative for the Shire of Coolgardie.</p> <p>The completed EOI form was sent to all CLC members along with the final agenda on 8 February 2022. SN shared her screen so that JMcL could read Rhonda's EOI.</p> <p>SN requested the CLC confirm acceptance of her EOI.</p>	<p>Finance to amend the EOI form and distribute to the CLC.</p>

	<p>TR confirmed and LM seconded. SN confirmed that Rhonda Evans is now a member of the CLC.</p> <p>SN also suggested that the EOI form should be amended to state that the completed EOI form would be shared with all current CLC members. The following wording was suggested.</p> <p>“Please note that this EOI will be distributed to all members of the CLC for evaluation purposes and that by submitting this form you provide consent for its distribution.”</p> <p>The CLC agreed to this amendment.</p> <p>9.2 Meeting format of future CLC meetings</p> <p>JMcL stated that she preferred face-to-face meetings at the Coolgardie Community Recreation Centre as it provided an opportunity to catch up and have discussions with other CLC members prior to the start of the meeting. JMcL commented that face-to-face meetings should be a priority.</p> <p>JMcL suggested that if Finance are not able to travel to Coolgardie for a face-to-face meeting due to departmental restrictions, then Finance could join the meeting virtually whilst the other CLC members met face-to-face. JMcL requested that this be considered as an option.</p> <p>TR agreed that face-to-face meetings were preferable but also noted the high attendance rate at the current meeting, suggesting it may have been facilitated by the increased accessibility offered by the virtual format. TR suggested that virtual options are retained even if future meetings are held in-person.</p> <p>JT commented that the decision regarding the meeting format was not solely Finance’s due to the evolving COVID environment and local government decisions regarding access to its facilities. JT will liaise with EH regarding the continued viability of holding CLC meetings at the Shire of Coolgardie’s facilities. He noted that the decision was not a Council decision but an operational decision that he would make.</p> <p>JMcL suggested that CLC meetings could be held at non-local government venues with virtual meeting facilities. She also commented that the FMC must conduct site visits throughout the year and that the CLC meetings are tied in with these visits, therefore, it was important to have face-to-face meetings.</p> <p>EH thanked JMcL for her comments. EH recognised that it was an important discussion to have but that a decision would have to be revisited in June with a consideration of public health advice and the COVID situation at that time.</p> <p>LM sought clarification on whether two different situations were being discussed: the short term COVID situation and the long term meeting format. EH clarified that the long term meeting format was not being discussed and that the intention, where possible, was always to have face-to-face meetings with a virtual option. EH explained that the current discussion was about the June meeting about which a firm decision could not be made until closer to the date.</p>	
10.0	<p>Close / Scheduling of Next Meeting</p> <p>EH noted that the next CLC meeting is scheduled for 9 June 2022.</p>	

<p>EH asked the CLC members whether they had any objections to meeting on 30 June instead as this would allow the minutes of the Management Review Meeting (MRM) to be discussed at the next CLC meeting.</p> <p>LM clarified that the meeting had actually been scheduled for 19 June in a previous CLC meeting, however, no one realised at the time that this date was a Sunday. She noted that the December 2021 MRM minutes were incorrect as it included 9 June 2022 as the meeting date.</p> <p>EH asked the Committee if they had any objections to having the meeting on 30 June. There were no objections. EH commented that it was unknown at this stage whether the June meeting would be held face-to-face or virtually, however, a tentative booking had been placed with the Coolgardie Community Recreation Centre for 30 June.</p> <p>EH confirmed that the next CLC meeting would be held on 30 June 2022.</p> <p>EH asked if there were any other items that the Committee wanted to raise before she closed the meeting.</p> <p>10.1 The next meeting is scheduled for 30 June 2022.</p> <p>EH closed the meeting at 11.26 am.</p>	
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Intractable Waste Disposal Facility (IWDF), Mount Walton East Community Liaison Committee (CLC) Meeting Minutes

Final Rev 1

Chairperson:	Eleanor Hopkins	Date & Time:	30 June 2022 10.10 am – 11.40 am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
		Meeting No.	2021/22 Meeting 3

Attendees:		
Eleanor Hopkins	(EH)	IWDF Project Director, Department of Finance (Chairperson)
Leanne Morton	(LM)	IWDF FMC Project Manager
Jan McLeod	(JMcl)	Coolgardie Community Representative
David Williams	(DW)	Community Representative – Western Australian community outside the Shires of Coolgardie, Menzies and Yilgarn
Tracey Rathbone	(TR)	Deputy President, Shire of Coolgardie
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
Bryan Close	(BC)	Deputy President, Shire of Yilgarn
Shane Chambers	(SC)	Executive Manager Regulatory Services, Shire of Yilgarn

Apologies		
Sze-Wan Ng	(SN)	IWDF Contract Manager, Department of Finance
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
Suzie Williams	(SW)	Coolgardie Community Representative
Lynn Webb	(LW)	Community Representative – Western Australian community outside the Shires of Coolgardie, Menzies and Yilgarn
Mal Cullen	(MC)	President, Shire of Coolgardie (see comment by TR at Section 2.0)
James Trail	(JT)	CEO, Shire of Coolgardie
Nic Warren	(NW)	CEO, Shire of Yilgarn
Brian Joiner	(BJ)	CEO, Shire of Menzies
Abnesh Chetty	(AC)	Environmental Officer – Licensing, Department of Water and Environmental Regulation

Observers
None

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>EH declared the meeting open at 10.10 am.</p> <p>EH acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>EH introduced herself and welcomed all committee members and advised there was no observers.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p> <p>TR clarified, for the CLC, that Councillor Mal Cullen is no longer the delegated Shire of Coolgardie elected member representative on the CLC. The Shire of Coolgardie elected member representatives on the CLC are TR and Councillor John Williams. John Williams has now resigned from Council and the Shire of Coolgardie is yet to nominate a replacement representative on the CLC. TR understood that John Williams has indicated that he would submit an EOI to become a community member of the CLC.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves, providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p>	
4.0	<p>Previous Minutes</p> <p>EH stated that the draft minutes for the previous meeting, held on 10 February 2022, were distributed on 18 February 2022, within the two-week timeframe in accordance with the CLC Terms of Reference and Operational Guidelines (CLC ToR).</p> <p>EH noted that minor amendments had been made to the June 2021, October 2021 and February 2022 meeting minutes and the updated versions distributed to the CLC prior to the meeting. EH asked if there were any further amendments.</p> <p>No further amendments were requested by the CLC therefore EH requested that the CLC endorse the minutes for June 2021, October 2021, and February 2022.</p> <p>EH moved to accept the February 2022 minutes. TR and DW seconded.</p> <p>EH moved to accept the October 2021 minutes. JMcl seconded.</p> <p>EH moved to accept the June 2021 minutes. JMcl seconded.</p>	

5.0	<p>Business Arising from Previous Minutes</p> <p>5.1 Confirm proponent’s commitment to providing information about modification to the Road Use Agreement with Tellus Holdings</p> <p>At the CLC meeting held on 10 June 2021, under item 9.3, JMcL asked if, under the new contract manager, the proponent would continue to provide information about modifications to the road use agreement with Tellus.</p> <p>At the CLC meeting held on 14 October 2021, EH advised that no modifications had been made to the road use agreement with Tellus Holdings.</p> <p>JMcL requested out of session that Finance, as the proponent, provide explicit confirmation of their commitment to provide information about modification to the road use agreement with Tellus at this meeting.</p> <p>EH confirmed the proponent’s commitment to do so subject to the information not being commercial in confidence and advised that no modifications have been made to the road use agreement with Tellus to date.</p> <p>TR commented that this issue has been discussed previously and requested that all discussions about the road use agreement be limited to issues that may impact the operation of the IWDF.</p> <p>JMcL did not agree as she felt that all aspects of the road use agreement were relevant to the operation of the IWDF.</p> <p>JMcL also commented that her request that the proponent provide explicit confirmation of their commitment to provide information about modification to the road use agreement was not just pertaining to the Tellus Holdings agreement but to all IWDF Access Road road use agreements.</p> <p>TR moved that relevant actions with respect to the road user agreement be limited to issues that may impact operation of the IWDF.</p> <p>LM commented that it was her understanding that this action was not necessary as it had been previously agreed that only the changes made to road use agreements that may impact the operation of the IWDF would be reported at CLC meetings. Aspects of the agreements that did not impact the IWDF were not to be reported to the CLC.</p> <p>LM also commented that the FMC undertakes a six-monthly road inspection of the Access Road and provides a report to the proponent. This report is independent of any reports provided by the holders of road use agreements.</p> <p>EH reported that daily updates about the status and condition of the Access Road are provided to the proponent by Tellus Holdings as required.</p> <p>JMcL requested that the FMC road inspection reports continue to be reported to the CLC at the meetings.</p> <p>5.2 Endorsement of Expression of Interest form – Revision 19</p> <p>At the CLC meeting held on 10 February 2022, under item 9.1, the CLC agreed to include the following wording in the Expression of Interest (EOI) form.</p> <p style="text-align: center;"><i>“Please note that this EOI will be distributed to all members of the CLC for evaluation purposes and that by submitting this form you provide consent for its distribution.”</i></p>	
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	<p>Revision 19 of the CLC Terms of Reference and Operational Guidelines which included the updated EOI form was distributed to the CLC on 18 February 2022 and again on 20 May 2022.</p> <p>LM moved to accept Revision 19 of the CLC Terms of Reference and Operational Guidelines. TR seconded.</p>	
6.0	<p>Management of the IWDF</p> <p>6.1 IWDF Safety Assessment and Safety Case</p> <p>LM reported that there were currently three separate deliverables in production:</p> <ul style="list-style-type: none"> • Post-Closure Safety Assessment (PCSA) based on agreed postulated external accident events during the Institutional Control Period (ICP) and agreed future limits on radioactive inventories for disposal (based on database records). • Operations Safety Assessment (OSA) based on previous draft OSA and incorporating requirements of RPSC-3 Disposal Code and ARPANSA recommendations (this part applies to PCSA too). • Facility Safety Case (FSC) which will refer to OSA, PCSA, supporting deterministic and probabilistic assessments and historical safety assessments for siting, design, and construction of the IWDF. <p>JMcL asked if the CLC could be provided with the draft documents for review.</p> <p>LM responded that at this time the documents are not at the review stage, but it is anticipated that draft documents would be available for review at the next CLC meeting.</p> <p>6.2 2020 – 2021 Performance and Compliance Report (PCR)</p> <p>LM reported that the draft 2020 - 2021 PCR is now complete. The PCR, as a PDF, is too large to email but if committee members would like a copy a request can be made to SN who will provide a link to a location where this PCR may be downloaded.</p> <p>EH asked if the PDF of the 2020 - 2021 PCR would be electronically available via the State Library given that a copy would be provided to the State Library under the requirements of the <i>Legal Deposit Act 2012</i>.</p> <p>LM responded that a copy would be available eventually, but it may take the State Library several months to catalogue the document as they have a significant cataloguing backlog.</p> <p>JMcL requested a hardcopy of the 2020 -2021 PCR.</p> <p>EH asked that JMcL contact SN who will organise a hardcopy to be provided to JMcL.</p> <p>TR suggested that hardcopies of the 2020 – 2021 PCR be placed in the Shire of Coolgardie Resource Centres for viewing by the community.</p> <p>LM commented that historically hardcopies of the PCRs had been provided to the Shire Coolgardie libraries and the State Library, but the practice had stopped after</p>	

<p>2008 as there were no disposals at the IWDF and the Shire of Coolgardie changed its library structure.</p> <p>It was agreed that three hardcopies of the 2020 – 2021 PCR would be provided to the Shire of Coolgardie for placement in their Resource Centres.</p> <p>LM asked if it was possible for the PCR to be added to the documents (Handbook and brochure) currently on the IWDF webpage on WA.gov.au.</p> <p>EH stated that this option would be investigated.</p> <p>6.3 2021 – 2022 PCR (draft)</p> <p>LM reported that the draft 2021 – 2022 PCR is 50% complete and will be completed as soon as the compliance auditing is finalised.</p> <p>LM reported that the draft PCR would be available for review by the next CLC meeting scheduled to be held in October 2022.</p> <p>6.4 Management Review Meeting</p> <p>LM reported that the 16th MRM was held on 2 June 2022. Minutes were emailed to the CLC on 23 June 2022. A hardcopy has been provided to JMCL prior to the start of this meeting.</p> <p>TR asked for some background regarding the fee waiver as reported in Section 3.3 of the MRM minutes.</p> <p>LM stated that when Cabinet decided to transfer responsibility for the IWDF from Waste Management (WA), a body corporate of the then Department of Environmental Protection, to the Department of Housing and Works, the then Department of Environmental Protection agreed that the annual environmental licence fee would be waived. This change occurred around 2005, but as considerable time has elapsed and there have been significant changes to how the current Department of Water and Environmental Regulation (DWER) operates DWER are now seeking to revisit this agreement.</p> <p>TR asked for explanation regarding the content of the public available spreadsheet as discussed in Section 3.5.</p> <p>LM responded that although the requirement for the public spreadsheet is detailed in Ministerial Statement 562 input has been sought from the Radiological Council (WA) (RCWA), and the Australian Safeguards and Non-Proliferation Office (ASNO), located within the Federal Foreign Affairs and Trade portfolio, with respect to the content to be included in the Public Spreadsheet. The reason for this is that given the security issues of today's world the proponent wanted to ensure that all relevant regulators were comfortable with the information to be provided publicly. It should be noted that the discussion only pertains to the information about radioactive waste as there are no restrictions for what is made publicly available for the chemical waste.</p> <p>LM stated that there was minor conflict between regulators (RCWA and ASNO) regarding the type of information to be made publicly available. For example,</p>	<p>Action: SN to provide three hardcopies of the 2020 – 2021 PCR to the Shire of Coolgardie.</p> <p>Action: SN to investigate the option of putting the PCR on the IWDF webpage.</p>
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RCWA would prefer that the location of the radioactive waste in the disposal cell and the depth to the waste were not included in the Public Spreadsheet, but ASNO had previously stated that they were comfortable with this information being included.

JMcL pointed out that this information is already publicly available in the disposal close out reports.

TR commented that she found the Governance Structure figure included in Section 4.3 to be extremely useful.

TR requested more information regarding the outstanding action for Action Plan 11 as reported in Section 5.1 of the MRM minutes.

EH responded that the new environmental licence had not yet been received from the DWER but it was expected soon as the expiry date extension to the current licence expires mid-August. If the new licence is not received by mid-August it is anticipated the DWER will again extend the expiry date given the delay is the responsibility of the DWER.

There was discussion regarding the frequency of CLC meetings. TR asked if there would be a submission to the EPA to formally change the requirement on Ministerial Statement 562.

EH responded that a submission to EPA Services within DWER to change the frequency of meetings would be required and this was currently being worked on. JMcL asked whether any other changes to the Ministerial Statement would be sought.

EH responded that other administrative matters would also be requested to be updated including changing the requirement for items stipulated in the Ministerial Statement to be referred to the Environmental Protection Authority. Such items can now be referred to the CEO of the Department of Water and Environmental Regulation (DWER) given the conflict that existed between a previous proponent (Waste Management WA) and DWER no longer exists.

LM commented that the transport requirements included in the Ministerial Statement would also be requested to be updated or removed. The transport requirements were included in the Statement prior to the release of the transport of the dangerous good legislation but oversight of transport by the EPA is no longer required.

6.5 Results of internal compliance audit

	Instrument	Status
6.5.1	Ministerial Statement 562	One noncompliance PC 8 CLC meetings
6.5.2	Department of Finance - Environmental Licence (DWER)	No noncompliances

	6.5.3	Department of Finance - Radiological Council Registration (RCWA)	No noncompliances																
	6.5.4	Department of Finance - Department of Foreign Affairs and Trade, The Australian Safeguards and Non-Proliferation Office (ASNO) Permit	No noncompliances																
	6.5.5	Department of Finance, - EHSQMS	One noncompliance MP-08 4.8.4 CLC meetings																
	6.5.6	IWDF (FMC) – EHSQMS	Auditing not yet completed but no noncompliances to date.																
	6.5.7	Department of Finance – Management Plans	One noncompliance MP 10 CLC meetings																
7.0	<p>CLC Terms of Reference and Operational Guidelines</p> <p>7.1 Management of electronic recording of CLC meetings</p> <p>The CLC meeting held on 10 February 2022 was recorded on Microsoft Teams. Finance advised it is internal policy to delete such recordings one week after the meeting date.</p> <p>EH further reported that only meetings completely held using Microsoft Teams would be recorded. Meetings where most of the CLC members were face to face would not be recorded.</p>																		
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>The status of waste enquiries and applications is provided below.</p> <table border="0"> <thead> <tr> <th>Stage of progress</th> <th>Radioactive</th> <th>Chemical</th> </tr> </thead> <tbody> <tr> <td>Approved applications</td> <td>21 (partial)</td> <td>0</td> </tr> <tr> <td>Applications under assessment</td> <td>0</td> <td>0</td> </tr> <tr> <td>Applications awaiting assessment</td> <td>0</td> <td>0</td> </tr> <tr> <td>Waste enquiries in progress</td> <td>0</td> <td>1</td> </tr> </tbody> </table> <p><i>Partial – some radioactive wastes declared for disposal will require further justification and resubmission to RCWA.</i></p> <p>8.2 Waste Acceptance Applications</p> <p>No new waste acceptance applications have been received by the FMC since the last meeting, but two waste owners have resubmitted the Radioactive Waste Acceptance Proforma (WAP) at Rev 18, in line with recommendations received from RCWA.</p>			Stage of progress	Radioactive	Chemical	Approved applications	21 (partial)	0	Applications under assessment	0	0	Applications awaiting assessment	0	0	Waste enquiries in progress	0	1	
Stage of progress	Radioactive	Chemical																	
Approved applications	21 (partial)	0																	
Applications under assessment	0	0																	
Applications awaiting assessment	0	0																	
Waste enquiries in progress	0	1																	
9.0	<p>General Business</p> <p>9.1 Proposal to move Expressions of Interest agenda item to beginning of CLC meeting order of business</p>																		

JMcL requested that future EOIs be addressed by the CLC at the beginning of CLC meetings so that persons who are appointed as members can participate in the remainder of the meeting.

EH asked whether anyone had any objections to this request, and it was agreed by those present that EOIs could be addressed after Introductions.

9.2 Notice of change of proponent on Ministerial Statement 562

On 13 October 2021, Finance submitted a *Form to change nominated proponent under Section 38(6a) of the Environmental Protection Act 1986* to change the proponent of Ministerial Statement 562 from Department of Finance, Building Management and Works to the Minister for Works C/- Department of Finance.

The change was requested as the Minister for Works is the relevant body corporate with the statutory authority, as an agent of the Crown in right of the State, to carry out the functions relevant to this licence.

The Department of Finance is the Government agency responsible for assisting the Minister for Works in the administration of the Public Works Act 1902 (WA).

On 21 January 2022, the Department of Water and Environmental Regulation (DWER) issued a *Notice of Revocation of a Proponent and Notice of Nomination as Proponent*, under Section 38I of the *Environmental Protection Act 1986*.

The Notice:

- (a) revoked the nomination of 'Department of Finance, Building Management and Works as the person responsible for the Proposal; and
- (b) nominated the 'Minister for Works C/- Department of Finance' as the person responsible for the Proposal.

The Notice was also sent to:

- The Environmental Protection Authority (EPA);
- Director General, DWER;
- Chief Dangerous Goods Officer, Department of Mines, Industry Regulation and Safety; and
- Secretary, Radiation Council.

TR asked who is the current Minister for Works?

EH responded that the responsibilities of the Minister for Works are delegated to the Minister for Finance. The current Minister for Finance is Dr Tony Buti.

9.3 Updated IWDF handbook

LM reported that the IWDF Handbook was updated in May 2022 to include the new proponent in Section 2. The updated version (Version 17) will be uploaded to the website as soon as a review of the document is complete.

JMcL requested that she be provided with a hardcopy of the handbook as soon as it was available.

DW asked how he can obtain hardcopies of the Handbook

EH asked DW to contact SN to request hardcopies of the Handbook.

	<p>9.4 CLC Visit to the IWDF</p> <p>The representatives from Yilgarn requested an update on when the CLC visit to the IWDF might be scheduled. They stated that they were very keen to visit the IWDF.</p> <p>EH asked whether other members would be interested in a site visit and all members present (six in total, including the Shire of Yilgarn) confirmed they would like a visit to the site. EH responded that she would consult with her management and report back to the CLC at the next meeting.</p> <p>TR, with reference to Section 12 of the MRM minutes, asked that if there was to be a site visit to the IWDF was there an induction for visitors.</p> <p>LM responded that there was an abridged IWDF Site Induction in place for accompanied visitors to the IWDF. If the CLC were to visit the IWDF they would receive the induction on arrival.</p> <p>9.5 Scheduling of 2022/23 CLC meetings</p> <p>EH proposed that the following dates be fixed for the next three CLC meetings:</p> <ul style="list-style-type: none"> • 20 October 2022 • 16 February 2023 • 22 June 2023 <p>EH commented that although the next three meetings were to be scheduled there would be some flexibility especially for the 2023 meetings as it was acknowledged that it is difficult to fix meeting dates twelve months in advance.</p> <p>JMcL thanked the proponent for holding a face-to-face meeting for this meeting. She commented that the last Teams meeting was extremely difficult for her as she could not hear unless she could see the persons face and therefore could not hear the discussions during the last meeting.</p> <p>9.6 Endorsement of Meeting Minutes</p> <p>JMcL requested that the proponent confirm that the endorsement of minutes would only occur at the next meeting and not online or via email.</p> <p>EH confirmed that the CLC would not be asked to endorse minutes outside CLC meetings and endorsement of minutes would only occur at a meeting of the CLC. TR commented that she is not concerned by minor typographical errors and is often frustrated by the amount of time taken to discuss these during meetings.</p> <p>TR suggested that an actions register may assist with the management of action items and reduce the need to amend CLC minutes. It was agreed the last 12 months was likely unique in the number of times minutes were required to be amended and the need for an actions register would be revisited later if required.</p>	
10.0	<p>Close / Scheduling of Next Meeting</p> <p>10.1 The next meeting is scheduled for 20 October 2022.</p> <p>EH closed the meeting at 11.40 am.</p>	

APPENDIX L

October 2021 Rehabilitation Monitoring Record

INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR

REHABILITATION MONITORING RECORD IWDF-FORM-38A

Project No.: DFI2021-004_ANMO				Storage Location of Photos: Aurora Environmental						Monitored By: MJS			
Site Name: Intractable Waste Disposal Facility, Mt Walton East				Client: Department of Finance						Date: 12/10/2021			
Monitoring Location: IWDF				Description and Other Comments (e.g. soil status)									
Trench/ Area	Location		Date	Time	Vegetation Density			Vegetation Variety		Soil Status	Dead veg?	Tyned?	Other Comments
	Loc. No	Photo No.			% Cover	Max height	Ave'ge height	Y/N	Number of plant types				
2020NRT01	01	-	12/10/2021	10:45	5	0.3	0.2	Y	6	Gravelly Sand	Y	Y	Growth and coverage looking good
	02	-	12/10/2021	10:55	4	0.2	0.1	Y	7	Gravelly Sand	Y	Y	Growth and coverage looking good
	03	-	12/10/2021	11:05	2	0.2	0.1	Y	3	Gravelly Sand	Y	Y	Fine clay seems to be restricting rehabilitation
2008RT01	01	-	12/10/2021	10:15	70	6.0	1.5	Y	8	Gravelly Sand	Y	Y	
	02	-	12/10/2021	10:25	65	2.0	1.3	Y	7	Gravelly Sand	Y	Y	
	03	-	12/10/2021	10:34	65	2.5	1.2	Y	8	Gravelly Sand	Y	Y	
2002RT01	01	-	12/10/2021	9:42	70	2.0	1.8	Y	7	Gravelly Sand	Y	Y	
	02	-	12/10/2021	9:51	40	2.0	1.0	Y	6	Gravelly Sand	Y	Y	
	03	-	12/10/2021	10:00	65	3.0	1.6	Y	8	Gravelly Sand	Y	Y	
2000RT01	01	-	12/10/2021	9:02	70	5.5	1.9	Y	9	Gravelly Sand	Y	Y	
	02	-	12/10/2021	9:17	30	4.0	1.0	Y	7	Gravel	Y	Y	Very slow improvement in coverage
	03	-	12/10/2021	9:30	60	4.5	1.5	Y	8	Gravel	Y	Y	
98NRT02	01									Gravelly Sand			
	02									Gravelly Sand			
98NRT01	01									Gravelly Sand			
	02									Gravelly Sand			
	03									Gravelly Sand & Clay			
97NRT02	01									Sandy			
	02									Sandy			
	03									Stoney Sand & Gravel			
97NRT01	01									Sandy Gravel			
	02									Sandy Gravel			
	03									Sandy Gravel			
96NRT01	01									Gravel & Sand			
	02									Sand, Clay & Gravel			
	03									Gravel & Sand			
94NRT02	01								Sand & Gravel				
94NRT01	01									Sand & Gravel			
	02									Sand & Gravel			
94RT01	01									Sandy			
	02									Sandy			
	03									Sandy			
92RS01+94RS01	01									Sand & Gravel			
	02									Sandy			
	03									Sandy			

Rehabilitation of cells pre 2000 have been deemed complete and as from 2021 will no longer be monitored

IWDF MT. WALTON EAST

**REHABILITATION
PHOTOS**

OCTOBER 2021



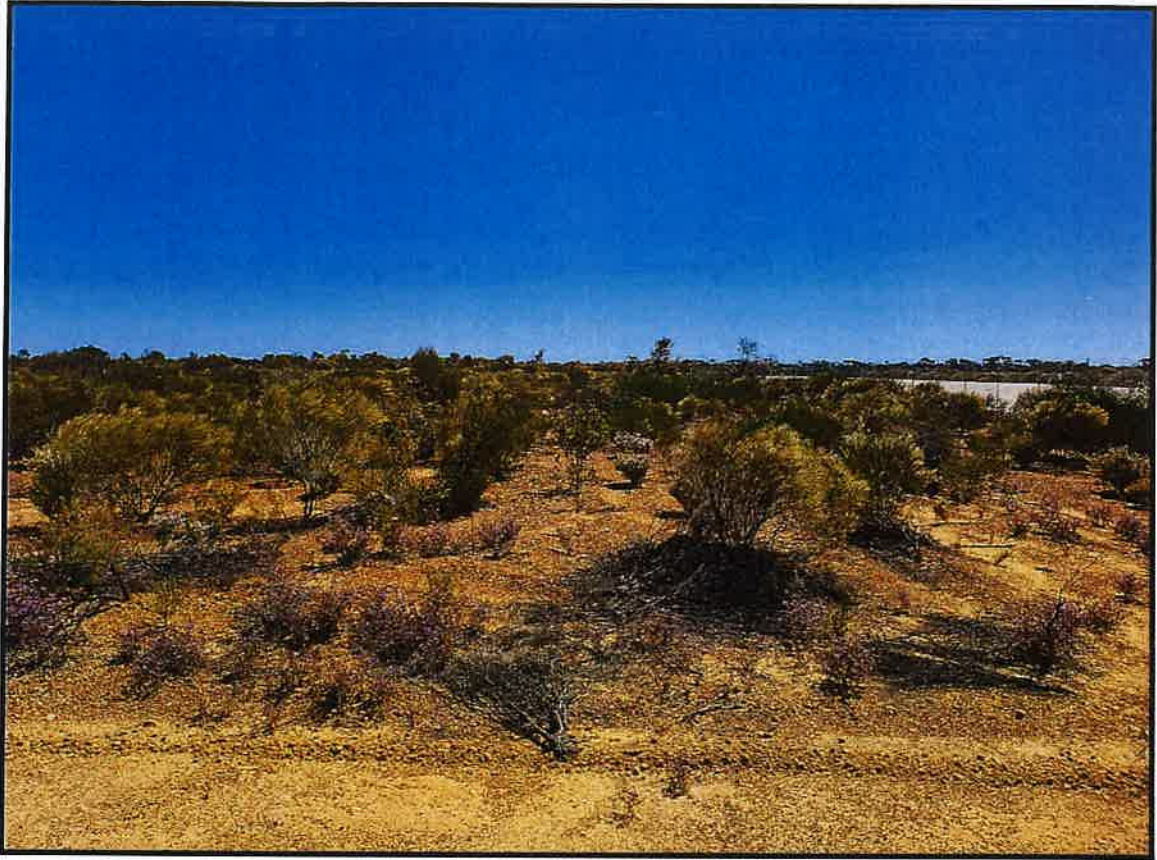
2020NRT01 - Loc.1



2020NRT01 - Loc.2



2020NRT01 - Loc.3



2008RT01 - Loc.1



2008RT01 - Loc.2



2008RT01 - Loc.3



2002RT01 - Loc.1



2002RT01 - Loc.2



2002RT01 - Loc.3



2000RT01 - Loc.1



2000RT01 - Loc.2



2000RT01 - Loc.3

APPENDIX M

October 2021 Capping Monitoring Record

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

CAPPING MONITORING RECORD IWDF-FORM-38b

Project No.: DF12021-004 ANMO		Storage Location of Photos: Aurora Environmental		Monitored By: MJS								
Site Name: Intractable Waste Disposal Facility, Mt Walton East				Client: Department of Finance								
Monitoring Location: IWDF Disposal Cells				Date: 12/10/2021								
Trench No.	Location/ Photo No.	Date	Time	Erosion channels?			Subsidence?			View	Description and Other Comments	Details
				Y/N	Number	Depth*	Y/N	Number	Depth*			
2020NRT01	Loc. 1	12-Oct	16:40	Y	1	2-5cm	N	-	-	Compound	New Trench	
	Loc. 2	12-Oct	16:31	N	-	-	N	-	-	Dome	New Trench	
2008RT01	Loc. 1	12-Oct	16:20	Y	Numerous	1-5cm	N	-	-	Compound	Minor short channels	
	Loc. 2	12-Oct	16:15	Y	2	1-3cm	N	-	-	Dome	Minor short channels	
2002RT01	Loc. 1	12-Oct	15:55	N	-	-	N	-	-	Compound		
	Loc. 2	12-Oct	16:04	N	-	-	N	-	-	Dome		
2000RT01	Loc. 1	12-Oct	15:45	Y	Numerous	2-10cm	N	-	-	Compound	Similar to Previous Observations	
	Loc. 2	12-Oct	15:39	Y	2	3-5cm	N	-	-	Dome	Main channels shallower	
98NRT02	Loc. 1	12-Oct	15:32	N	-	-	N	-	-	Compound		
	Loc. 2	12-Oct	15:26	N	-	-	N	-	-	Dome		
98NRT01	Loc. 1	12-Oct	15:13	Y	Numerous	1-5cm	N	-	-	Compound	Less Obvious Runoff Erosion	
	Loc. 2	12-Oct	15:19	Y	4	1-10cm	N	-	-	Dome	Similar to Previous Observations	
97NRT02	Loc. 1	12-Oct	15:01	Y	A few	1-5cm	N	-	-	Compound	Minor channels	
	Loc. 2	12-Oct	15:09	N	-	-	N	-	-	Dome		
97NRT01	Loc. 1	12-Oct	14:39	Y	A few	1cm	N	-	-	Compound		
	Loc. 2	12-Oct	14:50	Y	2	2-5cm	N	-	-	Dome		
96NRT01	Loc. 1	12-Oct	14:21	N	-	-	N	-	-	Compound		
	Loc. 2	12-Oct	14:27	N	-	-	N	-	-	Dome		
94NRT02	Loc. 1	12-Oct	14:14	N	-	-	N	-	-	Dome		
	Loc. 1	12-Oct	13:56	N	-	-	N	-	-	Compound		
94RT01	Loc. 1	12-Oct	13:44	N	-	-	N	-	-	Compound		
	Loc. 1	12-Oct	11:54	N	-	-	N	-	-	Dome	Surface fines mostly removed	

**IWDF MT. WALTON EAST
TRENCH CAPPING PHOTOS
OCTOBER 2021**



2020NRT01 - Loc.1



2020NRT01 - Loc.2



2008RT01 - Loc.1



2008RT01 - Loc.2



2002RT01 - Loc.1



2002RT01 - Loc.2



2000RT01 - Loc.1



2000RT01 - Loc.2



1998NRT01 - Loc.1



1998NRT01 - Loc.2



1998NRT02 - Loc.1



1998NRT02 - Loc.2



1997NRT01 - Loc.1



1997NRT01 - Loc.2



1997NRT02 - Loc.1



1997NRT02 - Loc.2



1996NRT01 - Loc.1



1996NRT01 - Loc.2



1994NRT02 - Loc.1



1994NRT01 - Loc.1



1994RT01 - Loc.1



1992RS01 / 1994RS01 - Loc.1

APPENDIX N

2021 – 2022 IWDF Management Manuals



**INTRACTABLE WASTE DISPOSAL FACILITY MT WALTON EAST
ENVIRONMENTAL, HEALTH & SAFETY AND QUALITY MANAGEMENT SYSTEM
(EHSQMS)**

**MANAGEMENT AND POLICY MANUAL
DEPARTMENT OF FINANCE**

This Manual is the Environmental, Health and Safety and Quality Policy, Organisational Structure, and Procedures as adopted by the Department of Finance (Finance) for the management of the Intractable Waste Disposal Facility, Mt Walton East (IWDF).

This Management and Policy Manual is intended to provide an overview of policy, corporate status, and of the Management System itself.

This Management and Policy Manual should be read in conjunction with the relevant procedures and attachments.

Rev	Date	Description	Prepared by:	Checked by:	Approved by:
1		Draft			
1.1	26/08/07	Draft	LDM	MJS	
2	10/09/07	Final	LDM	MJS	MJS
3	01/03/10	Draft	LDM	RH	
4	15/08/10	Final	LDM	RH	RH
4.1	01/07/11	Draft	LDM	RH	
5	14/08/11	Final change of proponent details	LDM	RH	RH
5.1	12/09/12	Update Section 4 DEC to OEPA	LDM	RH	RH
6	06/09/13	Update Sections 2,4 & 5 & change DEC to DER	LDM	RH	RH
7	12/06/14	Minor corrections and update to Section 3.3	LDM	LM & RH	RH
8	10/11/14	Review and comment on Environmental & Quality policy for discussion at next MRM	LDM	LM & RH	
9	14/09/15	Update to env policy – new ISO 14001 & 9001	LDM	LM & RH	MT
10	23/10/16	update to section 3.3	LDM		MT
11	31/05/17	Update to EHSQ Policy	LDM	MJS	MT
12	24/10/17	Inclusion of signed EHSQ policy, pagination & version #, also updated RSO info	LDM	MJS	
13	21/11/18	Update to naming of govt depts., review of policy, update to summary of disposal, governance	LDM	MJS	MT
14	14/11/19	Review – branding change	LDM	MJS	MT
15	22/03/21	Update to include 2020NRT01, minor change to Policy title, update (replacement to governance structure figure), minor change to Policy to ISO standard naming	LDM	MT	MT
16	10/09/21	Revised Figure 3: IWDF Governance Structure included, 92RS02 renamed 94RS01, title of Figure 3 in TOC updated,	LDM		
17	16/12/21	minor formatting changes, update to S4 to rename Chemical Disposal Area to Chemical and Radioactive Disposal area for some disposal cell summaries. Policy review.	LDM	MT	MT approved 16/12/21

MT – Management Team

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**Government of Western Australia
Department of Finance**

**ENVIRONMENTAL, HEALTH & SAFETY AND QUALITY POLICY
INTRACTABLE WASTE DISPOSAL FACILITY**

The Department of Finance is responsible for the management of the Intractable Waste Disposal Facility (IWDF), owned by the State Government of Western Australia. The objective of intractable waste disposal is to isolate the waste permanently from the community and the environment as safely and economically as possible.

COMMITMENT

The Department of Finance is committed to minimising the impact of the IWDF and its operations on the environment, IWDF personnel and the general community of Western Australia. This commitment will be achieved through the continual implementation of the Environmental and Health & Safety and Quality Management System (EH&SQMS) which is consistent with the requirements of ISO 9001:2015, ISO 14001:2015 and ISO 45001:2018.

OBJECTIVES

The objectives of the IWDF EH&SQMS are to ensure:

1. the requirements of all statutory obligations, standards, specifications and codes or practice relevant to the operation of the IWDF are fulfilled or exceeded;
2. that the IWDF is operated to the highest standards of public sector management;
3. the use of recognised current best practices, such as pollution prevention practices for all activities at the IWDF;
4. continual awareness of international advances in technologies relevant to the operation of the IWDF;
5. the continued adequacy and suitability of the Environmental, Health & Safety and Quality Policy and the EH&SQMS through a process of maintaining, monitoring, reviewing, auditing and continually improving;
6. that all personnel involved in IWDF management and operations are appropriately educated and trained in order to continually improve professional skills, awareness and knowledge of the issues and practices;
7. direct liaison with the community of Western Australia on all operational activities and outcomes; and
8. that all disposal details, monitoring and auditing records, are both publicly available and securely stored for future reference.

RESPONSIBILITIES

Senior management will provide the resources and framework for setting objectives, targets and detailed actions as well as specifying review periods for assessing their continued suitability.

All IWDF personnel are responsible for implementing this policy and the processes developed to achieve the expectations of this policy within the area of their responsibility,

REVIEW

This policy will be reviewed annually for ongoing suitability by the management team.

Signed: Eleanor Hopkins
IWDF Project Director,

Date: 16/12/2021

1. IWDF SITE INFORMATION

1.1 Overview

Prior to the establishment of the Intractable Waste Disposal Facility (IWDF), Mt Walton East in 1992, thorough studies and investigations were undertaken to ensure that the site had suitable geological, meteorological, and hydrogeological characteristics and contained no areas of environmental, economic, agricultural, or cultural importance. Studies in the following areas helped in the establishment of appropriate objectives and management plans for the site.

1.2 Aboriginal and Archaeological Significance

A study of ethnographic and archaeological sites at and near the IWDF was conducted in 1988 prior to the commissioning of the site and included consultation with Aboriginal leaders in the region. The study concluded that there were no sites of Aboriginal or archaeological significance within a 15-kilometre radius of the site.

1.3 Flora and Fauna

Several flora and fauna surveys of the region have been undertaken since 1988. While no declared rare flora has been discovered at the site, some priority species have been identified and measures are now in place to ensure these species are conserved.

1.4 Groundwater

The IWDF lies in an area where the regional water table is absent. Despite extensive drilling over the site no groundwater has been encountered down to bedrock. Any water derived from rainfall either evaporates or infiltrates the colluvial sediments on the site, where it eventually percolates to the top of the silcrete layer before either being taken up by plants, evaporating or migrating slowly off site. Water migration off-site would eventually drain into the colluvial and alluvial sediments of the ancient drainage systems located on the east and west of the IWDF site. Groundwater in these drainage areas is generally saline to hypersaline and has no agricultural or human use.

In 1995, two monitoring bores were constructed to bedrock to investigate groundwater conditions adjacent to the existing radioactive waste and chemical waste disposal area and were dry at the time of construction. Subsequent monitoring has not found any groundwater in either of these monitoring bores. In 1999, six further monitoring bores were constructed down to bedrock in the general vicinity of the chemical and radioactive waste disposal area. In 2009, an additional monitoring bore was constructed down to bedrock in the vicinity of the 2008 disposal trench. Groundwater monitoring to date has not found any groundwater in any of these monitoring bores.

1.5 **Geology**

The IWDF lies in the central eastern portion of the Achaean Yilgarn Block, a tectonically stable, ancient craton comprising of granitic rocks and intervening greenstone belts which contain a variety of volcanic, metamorphic, and sedimentary rocks. The Yilgarn block generally has low seismic activity.

In geological terms the IWDF site is typical of areas overlying deeply weathered granite domes. The profile generally comprises four main lithologies and from the surface these are:

1. Colluvial sand - comprises yellow brown quartz sand overlying nodular red brown clayey sand. It averages about 1.5 m thick;
2. Silcrete - comprises kaolinitic clay which has been variably indurated with silica to form a hard cap over underlying lithologies. This cap averages about 3 m thick.
3. Kaolinitic clay - comprises soft white kaolin weathered from preexisting granite. As a result, the clays contain relict quartz phenocrysts. This important profile houses the buried waste and is generally more than 15 m thick over the site. It is absent in several areas, especially where the bedrock is shallow, but elsewhere has a maximum thickness of 32.5 m.
4. Granitoid Basement - comprises a fine to medium grained leucocratic granite containing pegmatite and quartz veins. The basement topography varies over the site from 3.5 m to 47 m below the surface.

The lack of a groundwater table and the thickness of the kaolinitic clay profile are the key geological attributes of the site in terms of its function as an intractable waste repository because they preclude the transport of contaminants off-site.

2. PROPONENT HISTORY

Health Department of Western Australia (1992 to September 1996)

The IWDF was the initiative of the Health Department of Western Australia who was responsible for establishing the IWDF to enable the disposal of low-level radioactive waste collected over many years and stored in the radioactive waste depository at the Radiation Health Section of the Department of Western Australia.

Although the Health Department was the legal proponent for the IWDF until around September 1996 the operational responsibility for the IWDF was transferred to the Environment portfolio in 1994.

Department of Environmental Protection WA (October 1996 to 30 June 1998)

Operations were undertaken directly by the Department of Environmental Protection (DEP) and the works performed by the DEP Waste Operations Team.

Waste Management (WA) (1 July 1998 to January 2005)

Following amendments to the *Environmental Protection Act 1986* (EP Act) which took effect on 1 July 1998, and consequent completion of formal documentation in November 1998, Waste Management (WA) (WM (WA) a body corporate of the then DEP, became the proponent for operation of the IWDF under the EP Act. The IWDF was owned and operated by WM (WA) on behalf of the Western Australian Government. The IWDF site was operated under Ministerial Direction and was therefore monitored by the EPA.

WM (WA) was the operator of the IWDF, and senior officers in the DEP, working for WM (WA), managed the IWDF site.

WM (WA) did not require a licence or other authorisations as conferred by the EP Act, to undertake a waste management operation at the IWDF. It was taken that WM (WA) complied with all the provisions of the EP Act. However, the standard environmental and regulatory approvals were required in relation to the specifics of each waste management operation. WM (WA) was also obliged to perform operations under the directions of the Minister of the Environment and where instructed.

WM (WA) as the proponent for the IWDF accepted responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

Department of Housing and Works (February 2005 to January 2009)

In February 2005, responsibility for the IWDF was transferred to the Department of Housing and Works (DHW) and DHW was subsequently designated as the proponent for the IWDF for the purposes of environmental approval under part IV of the *Environmental Protection Act 1986*.

Management Orders issued under the *Land Administrations Act 1997* vested the reserve upon which the IWDF is located with the Minister for Works care of the Department of Housing and Works. DHW as the proponent for the IWDF accepted responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

Department of Treasury and Finance, Building Management & Works (February 2009 – June 2011)

In February 2009, after a change of government in Western Australia, the 'Works' function of the Department of Housing and Works, was transferred to the Department of Treasury and Finance, Building Management and Works (DTF/BMW).

Responsibility for the management and operation of the IWDF was transferred to the DTF/BMW along with other 'works' functions of the DHW at this time. DTF/BMW as the proponent for the IWDF accepted responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

Department of Finance (July 2011- current)

On 1 July 2011, the Department of Treasury and Finance was renamed to the Department of Treasury. At the same time, the State Revenue, Government Procurement, Building Management and Works and Shared Services functions of the Department of Treasury and Finance were transferred to the newly created Department of Finance.

Responsibility for the management and operation of the IWDF was transferred to the Department of Finance along with other 'works' functions of the DTF at this time. Department of Finance as the proponent for the IWDF accepts responsibility on behalf of government for:

- ongoing management of the wastes disposed of at the IWDF;
- acceptance of waste for disposal; and
- monitoring of the IWDF site for the operational and institutional control period.

3. SITE LICENCE AND REGISTRATION INFORMATION

3.1 Environmental Licence

The IWDF is licensed by the Western Australian Department of Water and Environmental Regulation (DWER) (previously the Department of Environment Regulation (DER)) under Part V the *Environmental Protection Act 1986*, as a Prescribed Premises - Category 66 Class V intractable landfill site.

The IWDF Environmental Licence L8190/2007/1 includes two conditions which are as follows:

1. Reporting Conditions -- requiring the Licensee to provide an Annual Audit Compliance report to the Director of the Environmental Regulation Division by 1 March each year.
2. Notification of Intention to Dispose -- requiring the Licensee to notify the Director of the Environmental Regulation Division in writing three months prior to the delivery of waste at the IWDF.

3.2 Management Orders

Management Orders issued under the *Land Administrations Act 1997* vest the reserves upon which the IWDF and the 100 km IWDF access road with the Minister for Works.

3.3 Radiological Council Registration

The IWDF is required under the *Radiation Safety Act 1975* to be registered with the Radiological Council of Western Australia (RCWA) as premises in which radioactive substances are used, stored or manufactured. The registration is usually issued for a period of three years.

The RCWA registration RS 13/2011 20590 for 10 February 2020 to 8 February 2023 names Emma Savage-Jones, Director Building Management, Department of Finance as the registrant and Stuart Parr as the RCWA approved RSO for the IWDF.

With exception of the deletion of a duplicated condition the conditions, restrictions and limitations of the renewed registration remain the same as the previous registration.

3.4 Permit to Possess Nuclear Material

Australia has enacted the *Nuclear Non-Proliferation (Safeguards) Act 1987* to ensure that international obligations are met under the Nuclear Non-Proliferation Treaty (NPT). This Act is only concerned with nuclear materials such as uranium, thorium, and plutonium.

As there are small quantities of thorium and uranium disposed at the IWDF the facility is required to have in place a 'Permit to Possess Nuclear Material'. This permit (PN207) requires Finance to report, annually to ASNO, its inventory of nuclear materials and a description of each building containing nuclear materials.

4. SUMMARY OF DISPOSAL OPERATIONS AT THE IWDF

Since 1992, fourteen disposal cells have been established at the IWDF. For each cell, a summary of waste disposed, and dimensions is provided below.

92RS01 - Radioactive waste, Health Department

The waste comprised numerous small radioactive sources including a variety of teaching, research, hospital, and industrial wastes held in store by the Radiation Health Section of the Health Department Western Australia. The waste was packaged into 60 litre drums that were filled with cement slurry. The 60 litre drums were placed in 205 litre steel drums that were filled with concrete to remove voids. A total of 66 x 205 litre drums and a one-metre-long cylinder were disposed of at the IWDF by progressively concreting them in place in a two-metre diameter, 28 metres deep shaft, located in the Radioactive Waste Disposal Area. The waste is located 5.8 metres below ground level.

94RS01 - Radioactive waste, Health Department

The waste consisted of numerous small radioactive items held in store by the Radiation Health Section of the Health Department Western Australia. The waste was packaged into 60 litre steel drums backfilled with cement slurry. The drums were then placed into 205 litre steel drums that were backfilled with cement to remove voids. A total of 69 205 litre steel drums were then progressively concreted into place in a 27-metre-deep by two metre diameter shaft located in the Radioactive Waste Disposal Area. The waste is located 5.8 metres below ground level.

94RT01 - Radium contaminated equipment, CSBP and Farmers Ltd

The waste consisted of process equipment contaminated with radium. The contaminated equipment originated from CSBP & Farmers Ltd and was transported to the IWDF in three 6 metre shipping containers. The void spaces in the shipping containers were filled with cement slurry at the IWDF. Disposal was in a 40-metre-long, 3-metre-wide and 8-metre-deep trench located in the Radioactive Waste Disposal Area. The waste is located 4.5 metres below ground level.

94NRT01 - Pesticides, Health Department

The waste consisted of household pesticides stockpiled by the Pest Control Unit of the Health Department of Western Australia. The waste was packaged into 18 205 litre steel drums, which were then backfilled with cement slurry to preclude voids. The drums then disposed of in a 3.5-metre-long, 2.5-metre-wide and 4-metre-deep trench located in the Chemical and Radioactive Waste Disposal Area. The waste is located 2.8 metres below ground level.

94NRT02 - Arsenic waste, Department of Agriculture

Waste consisted of arsenical sheep dip wastes stockpiled by the Department of Agriculture after its use was banned in Western Australia. The waste was packaged in 219 205 litre steel drums, transported to the IWDF, and then disposed of in an 18-metre-long, 5-metre-wide, and 5-metre-deep trench in the Chemical and Radioactive Waste Disposal Area. The waste is located 3.8 metres below ground level.

96NRT01 - Contaminated soil, Department of Agriculture

Waste consisted of soil contaminated with the organochlorine pesticide DDT and toluene that resulted from the spillage of 20,000 litres of Dichlorodiphenyltrichloroethane (DDT) mixture. The spill occurred from a ruptured tank at the Wongan Hills Agricultural Research Station operated by the then Agriculture Western Australia.

Some bulk waste contaminated with DDT and toluene was also disposed of in the trench. This bulk waste included personal protective equipment worn by people working on the packaging and disposal operation. Also included, was contaminated concrete from the floor of a shed at the research station that was in the path of the spill, and tarpaulins used to cover the spill area at Wongan Hills to prevent rainwater incursion before site remediation.

The waste was packaged in 1,012 two-tonne capacity bulka bags and disposed of in a 55-metre-long, 8-metre-wide, 8-metre-deep trench located in the Chemical and Radioactive Waste Disposal Area. The waste is located 4.5 metres below ground level.

97NRT01 - Arsenic trioxide, Kanowna Belle Gold Mines

Waste consisted of arsenic trioxide generated as a by-product of gold extraction by Kanowna Belle Gold Mines. The waste was packaged into 986 bulka bags, weighing on average 0.65 tonne. Arsenic levels in the waste averaged 25% and were all below 70%.

The waste was disposed of in a trench in the Chemical and Radioactive Waste Disposal Area that was 9.5 metres deep, 80 metres long and 9 metres wide. The waste is located 6.0 metres below ground level.

97NRT02 - Arsenic waste, Wesfarmers CSBP

Waste consisted of arsenic generated as a by-product of the vetrocoke process in the production of ammonia by Wesfarmers CSBP Ltd at its fertiliser and chemical facility in Kwinana.

The waste was packaged in 1,662 220 litre high-density polyethylene (HDPE) over drums placed within bulka bags, and 308 60 litre HDPE drums with three drums per bulka bag. Used personal protective equipment and materials from the packaging activities were placed in 37 bulka bags and buried in the trench.

Composite and random samples indicated that the arsenic concentration in the waste ranged from 1.5% to 33.6%. The waste was disposed in a 14.3-metre-deep trench in the Chemical and Radioactive Waste Disposal Area, with base dimensions of approximately 55 metres long and 7 metres wide. The waste is located 9.0 metres below ground level.

98NRT01 - Arsenic trioxide waste, Kanowna Belle Gold Mines

Arsenic trioxide waste generated as a by-product of gold extraction by Kanowna Belle Gold Mines. The waste was packaged into 748 bulka bags, weighing on average 0.65 tonne. Arsenic levels in the waste ranged from 2% to 50% arsenic (average 27%). The waste was disposed of in the Chemical and Radioactive Waste Disposal Area in a 12.4-metre-deep trench with base

dimensions of approximately 42 metres long and 12 metres wide. The waste is located 8.0 metres below ground level.

98NRT02 - PCB contaminated soil, Stephenson and Ward Site

The waste comprised polychlorinated biphenyl (PCB) contaminated soil from the remediation of the Stephenson and Ward incinerator site in Welshpool. The waste was packaged into 103 bulka bags weighing 1.2 to 2.0 tonnes. PCB concentrations in the waste varied between 59 to 9,200 milligrams per kilogram. The waste was disposed of in the Chemical and Radioactive Waste Disposal Area in a 12.4-metre-deep trench with base dimensions of approximately 13 metres long and 8.5 metres wide. The waste is located 7.5 metres below ground level.

2000RT01 - Radioactive and chemical waste, various waste owners

This 2000 disposal at the IWDF involved the burial of 2,905.8 cubic metres of radioactive and non-radioactive wastes, originating from twelve different companies and government agencies. The waste was disposed of in the Chemical and Radioactive Waste Disposal Area.

Excavation began at the site in early January, with the construction of a specifically designed disposal trench, measuring 56 metres long, 12 metres wide and 13 metres deep.

Acceptance of chemical wastes commenced in early March and was completed by mid-April. The first consignment of waste consisted of 1,483 bulka bags of arsenic powder, and 96 bulka bags of used filters and arsenic contaminated personal protective equipment from Kanowna Belle Gold Mines. Following this, 192 x 205 litre drums of arsenic sludge from vetrocoke processes from Wesfarmers CSBP, 20 x 205 litre steel drums of vanadium powder and six x 205 litre drums of arsenic trioxide and dried ferric/calcium arsenate sludge from AMMTEC Pty Ltd were disposed. Arsenic contaminated wastes packaged in 23 x 205 litre drums, one hazspill drum and three steel bins of arsenic were also accepted at the site from Agriculture Western Australia. In addition to this 240 x 205 litre steel drums, packaged in steel bins from Nufarm Pty Ltd, containing mixed organic chemicals originating from pesticides manufacture, were also disposed.

Following the burial of all the chemical wastes, 64 x 205 litre steel drums of low-level radioactive waste were disposed of. A specially constructed clay barrier separated the radioactive and chemical waste.

The Health Department made up most of the radioactive waste consignment with 50 x 205 litre drums of exit signs and gauge sources. The Department of Conservation and Land Management (2 x 205 litre drums of soil moisture gauge sources), Radiation Safety Services (4 x 205 litre drums of industrial gauge sources), Simsmetal (1 x 205 litre drum of contaminated scrap metal), Agriculture Western Australia (4 x 205 litre drums of soil moisture gauge sources), North Ltd (1 x 205 litre drum containing XRF instrument source) and Advanced Manufacturing Technology Centre (2 x 205 litre industrial gauge sources) made up the rest of the consignment.

Construction of the water shedding dome for the trench was completed and the site demobilised in early June. The waste is located 8.0 metres below ground level.

2002RT01 - Radioactive and chemical waste, various waste owners

The 2002 disposal was conducted between April 2002 and October 2002 and involved the burial of radioactive and non-radioactive wastes, originating from six different companies and government agencies.

The chemical and low-level radioactive wastes were co-disposed in a trench, designated Trench 2002RT01, in the Chemical and Radioactive Waste Disposal Area at the IWDF.

The chemical waste consisted of 21 x 6 metre and one x 12 metre sea containers and 92 x 205 litre drums of arsenic trioxide contaminated solids from the decommissioning of plant at Wesfarmers' Kwinana Fertiliser Operation and 30 x 205 litre drums of arsenic based products collected during the Chem Collect program.

Following burial of the chemical waste a clay barrier was constructed to ensure separation of the radioactive waste from the chemical waste and then the 5 x 205 litre drums and one concrete encased safe containing low level radioactive waste were placed in the trench. A multi-layer, compacted cap was then constructed to secure the waste.

The radioactive waste was packaged into 60 litre steel drums backfilled with cement slurry. The drums were then placed into 205 litre drums that were backfilled with cement to remove voids.

The disposal trench was constructed to a depth of 14.6 metres, a width of 12 metres and a length of 19 metres. Construction of the water shedding dome for the trench was completed and the site demobilised in early October. The waste is located 9.2 metres below ground level.

2008RT01 - Radioactive and chemical waste, various waste owners

The 2008 disposal was conducted between January and October 2008 and involved the burial of radioactive and non-radioactive wastes, originating from eleven different companies, private citizens, and government agencies.

The chemical and low-level radioactive wastes were co-disposed in a trench, designated Trench 2008RT01, in the Chemical and Radioactive Waste Disposal Area.

The chemical waste consisted of 3,564 flexible intermediate bulk containers (FIBCs) of arsenic trioxide fume waste generated as a by-product of tantalum processing from Talison Minerals in Greenbushes, Western Australia.

Following the burial of the chemical waste a clay barrier was constructed to ensure separation of the radioactive waste from the chemical waste and then 62 x 205 litre steel drums containing low level radioactive waste were placed in the trench. A multi-layer, compacted cap was then constructed to secure the waste.

The radioactive waste was packaged into 60 litre steel drums backfilled with cement slurry. These drums were placed into 205 litre steel drums that were backfilled with cement to remove voids.

The disposal trench was constructed to a depth of 14 metres, a width of 26 metres and an overall length of 147 metres. Construction of the water shedding dome for the trench was completed and the site demobilised in early October. The waste is located 8.5 metres below ground level.

6.14 2020NRT01 - Contaminated piping, Water Corporation

The 2020 disposal operation was conducted between February and June 2020. The chemical wastes, originating from the Water Corporation, were disposed in a trench designated 2020NRT01 in the Chemical and Radioactive Waste Disposal Area.

Waste disposed consisted of 451 x 205 L steel drums, 29 x 1,000 L intermediate bulk containers (IBCs) containing bituminous pipe coating contaminated with asbestos and creosote which included polycyclic aromatic hydrocarbons (PAHs) and polychlorinated biphenyls (PCBs), one sea container containing contaminated solids and 1,200 lineal metres of pipe with bituminous pipe coating attached.

The disposal trench was constructed to a depth of 14 metres, a width of 26 metres and an overall length of 73 metres. The waste is located 8.5 metres below ground level.

5. ENVIRONMENTAL, HEALTH & SAFETY AND QUALITY MANAGEMENT SYSTEM

5.1 Overview

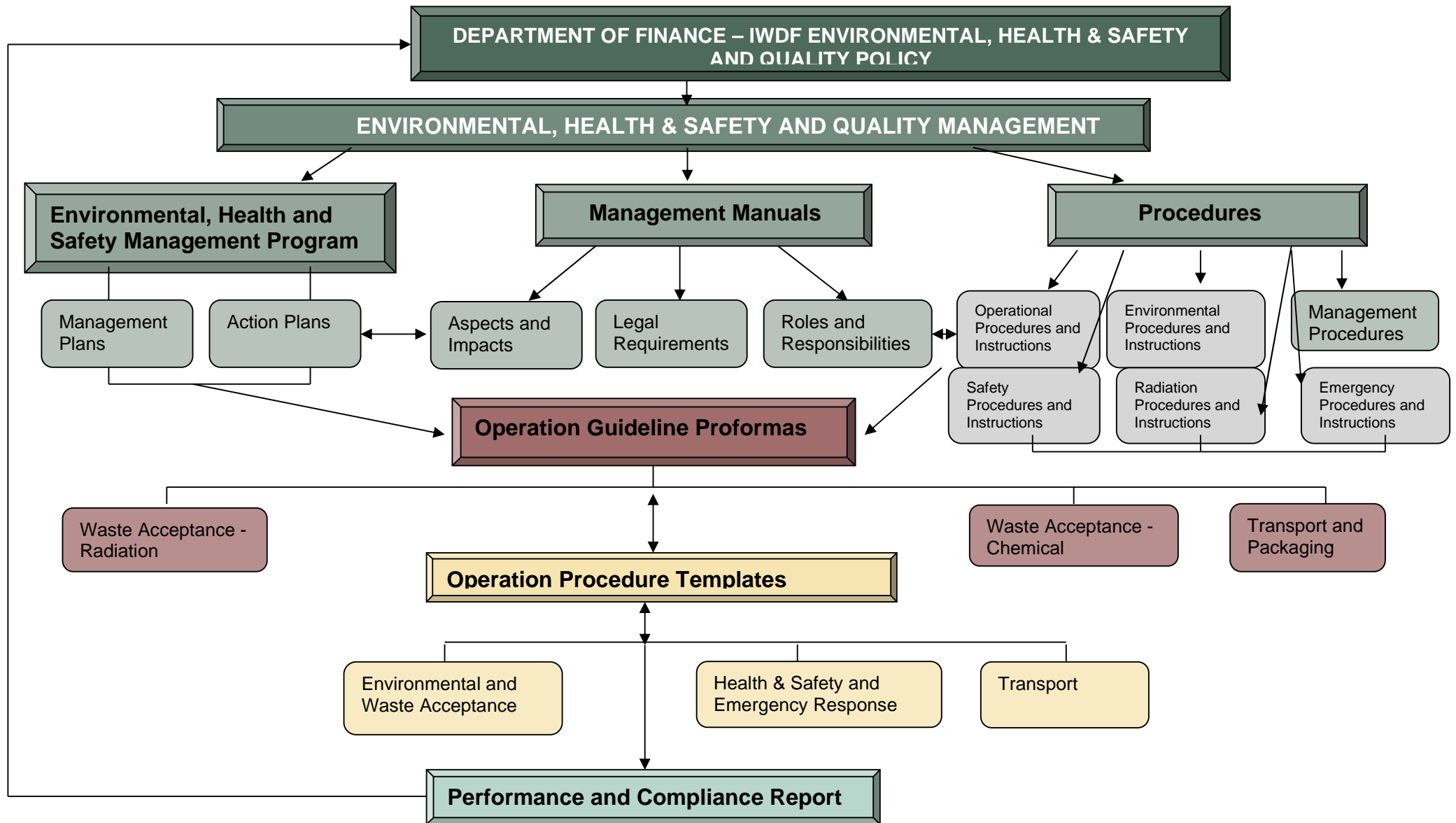
The IWDF Environmental, Health & Safety and Quality Management System (EHSQMS) is designed to identify areas of actual or potential environmental risk resulting from activities at the IWDF and formulate procedures and objectives which minimise or eliminate these risks.

When correctly implemented the EHSQMS will integrate environmental, quality and health and safety management into the IWDF's daily management, long term planning and other management systems, and ensure the Finance maintains a high level of performance.

The Facility Management Contractor (FMC), on behalf of Finance provide the resources required to achieve a quality service to customers, ensure employee work satisfaction and safety, and guarantee the community sound environmental performance through responsible and informed practices and decision making.

The EHSQMS consists of the following components, as summarised in Figure 1.

FIGURE 1 Principal Environmental, Health and Safety Management System Documents



5.2 Management Manuals

There are two management manuals which contain central information about the management of the IWDF and provide an overview of the system.

The Finance management manual (this manual) provides details on the IWDF site and an overview of the components of the management system and how they interconnect.

The Finance management manual also contains the three subcomponents detailed below:

- a) *Legal Register*: The legal register details the major commonwealth and state legislation, which the IWDF must adhere to.
- b) *Aspects and Impacts Register*: Identifies all aspects of activities at the IWDF and provides environmental, socio-political, legal and health and safety consequence and risk ratings for the impacts of each aspect.
- c) *Roles and Responsibilities*: Details the responsibilities and activities of each position involved in the management of the IWDF. FMC roles are detailed more specifically in the FMC Organisational structure section.

The FMC management manual highlights the FMC's status and details the structure of the FMC procedures and the interaction with the Finance system.

5.3 Environmental, Health and Safety Management Program

The EMP provides the basis for the establishment and maintenance of effective management programs to achieve the standards, objectives, and targets for the IWDF, and to enable continual improvement in performance. It comprises of:

a) *Management Plans*: These management plans are summary documents which have been developed to provide high level management goals, objectives, and targets for the following aspects of the IWDF's activities:

- Flora and fauna
- Water
- Air quality
- Decommissioning and rehabilitation
- Health and safety
- Emergency response
- Radiation
- Transport

The management plans summarise the methods (i.e., procedures and operational controls) that are in place and must be maintained to achieve the on-going management goals, objectives, and targets, and hence sustain operational performance.

b) *Action Plans*: These action plans detail Finance's specific improvement objectives, both long and short term, which strive for continual improvement in performance and provide quantitative targets, timeframes, and personnel for achieving these objectives.

5.4 Procedures

a) *Operation Guidelines*: These are templates, which have been developed to manage the performance of specific tasks related to disposal operations. Guidelines for the following elements have been developed:

- Environmental;
- Waste Acceptance;
- Health and Safety & Emergency Response;
- Radiation;
- Packaging; and
- Transport.

b) *Operation Procedure*: When a disposal operation is planned the operation procedure templates are completed so that they address the waste types and operation. Once completed and approved the procedure templates become the operation procedures associated with that disposal operation.

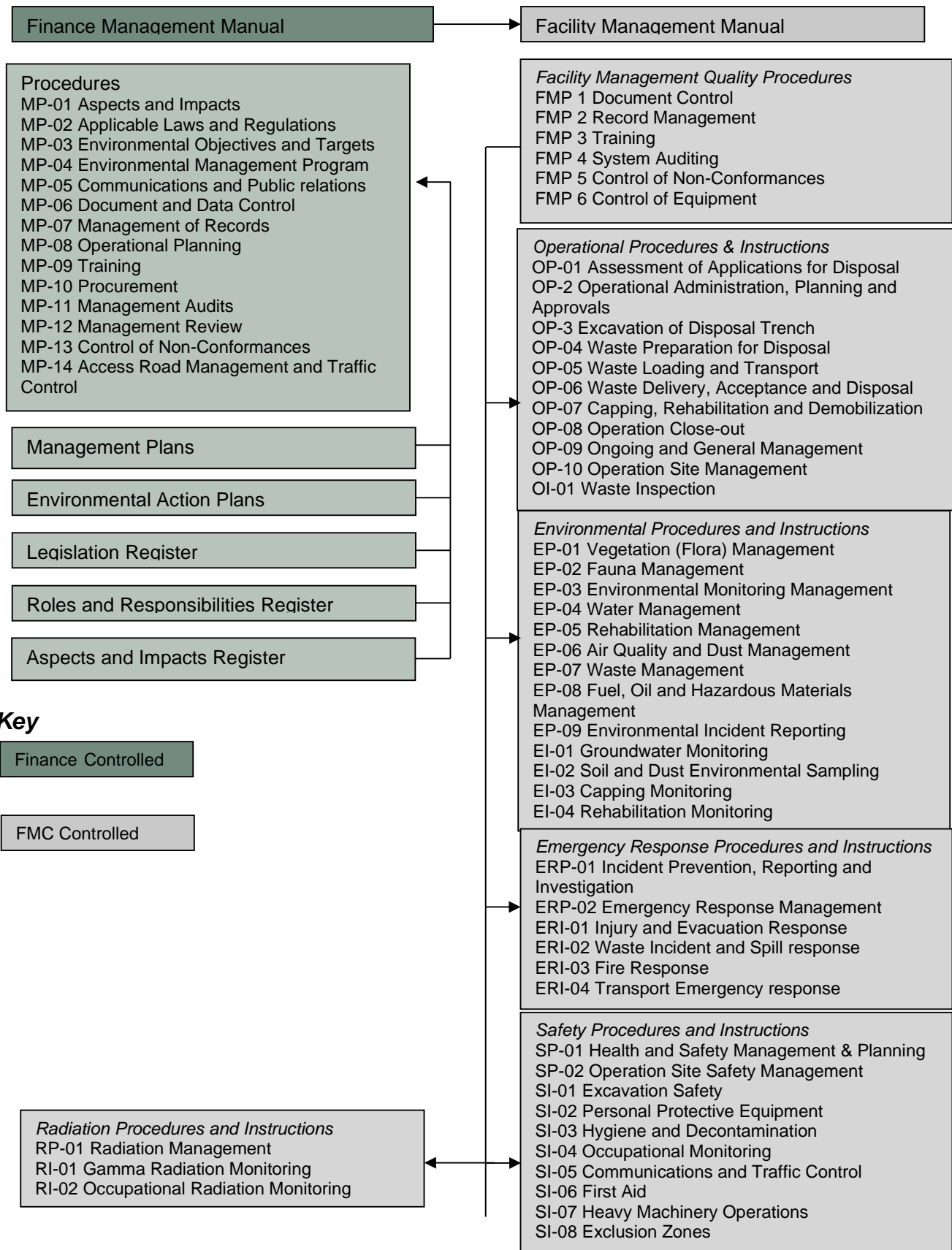
c) *Procedures*: Each procedure defines the purpose, scope and methodology of a set of systematic and related tasks and details the "who, what, where, when, how and why" of those tasks to allow any employee to undertake the tasks in the manner which Finance requires.

While each procedure is related to a specific activity or group of related activities, they are generally classified into six major groups:

- Management Procedures;
- Operational Procedures;
- Environmental Procedures;
- Health and Safety Procedures;
- Emergency Response Procedures; and
- Radiation Procedures.

The Management Procedures relate predominately to activities which are undertaken by Finance; however, the FMC also has Management Procedures. All other procedure types relate to tasks completed by the FMC. A list of all procedures and who is responsible for their management is detailed in Figure 2.

FIGURE 2 IWDF PROCEDURE STRUCTURE



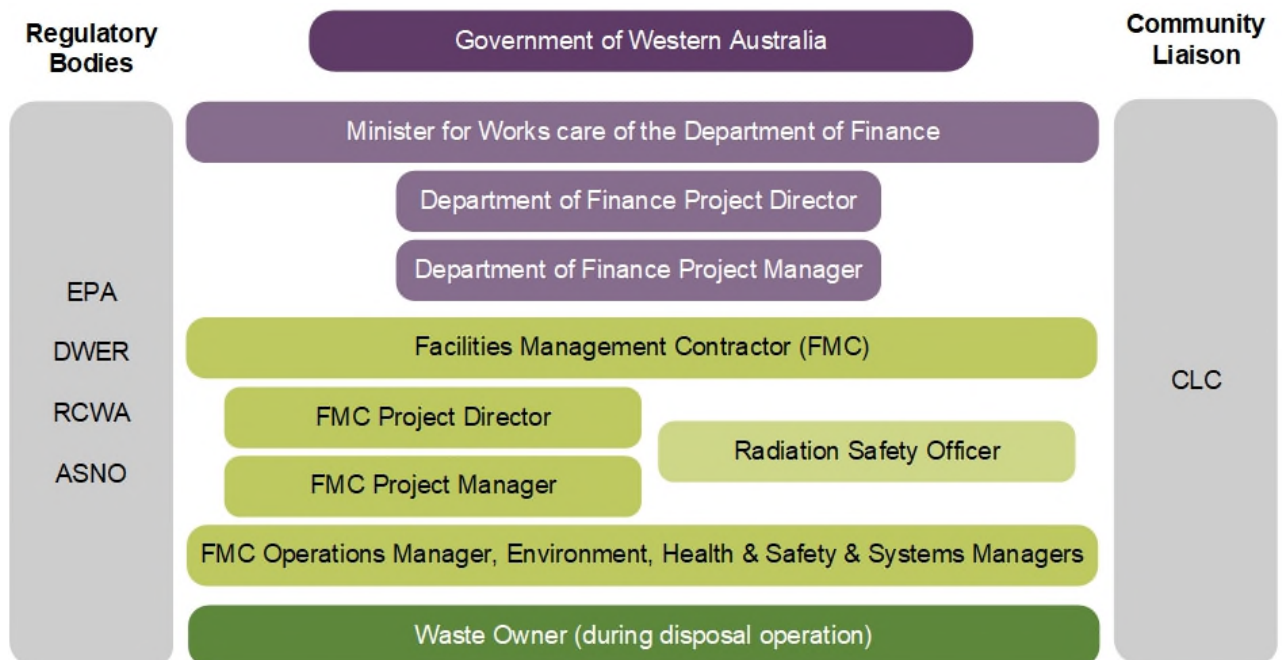
5.5 Performance and Compliance Report

This is an **annual** report prepared by Finance for submission to the relevant regulatory bodies such as the Environmental Protection Authority, the Department of Water and Environmental Regulation and the RCWA.

The Performance & Compliance Report (PCR) summarises the compliance of the operation of the Intractable Waste Disposal Facility (IWDF), Mt Walton East, against Ministerial Statement No. 562, permits, registrations, licences and associated management plans and other system requirements for the reporting period.

Governance of the IWDF is illustrated in Figure 3.

FIGURE 3 IWDF GOVERNANCE STRUCTURE



Acronyms

- EPA: Environmental Protection Agency
- DWER: Department of Water and Environmental Regulation
- RCWA: Radiological Council of Western Australia
- ASNO: Australian Safeguards and Non-proliferation Office
- CLC: Community Liaison Committee

FACILITY MANAGEMENT CONTRACTOR IWDF SYSTEM MANUAL INTRACTABLE WASTE DISPOSAL FACILITY

This Manual represents the Organisational Structure and Procedures adopted by the Facility Management Contractor (FMC) for the operation and management of the Intractable Waste Disposal Facility (IWDF), Mount Walton East, on behalf of the Department of Finance.

Unless otherwise agreed, this Manual remains the property of the Department of Finance.

The Manual is intended to provide an overview of organisation structure and the structure of the FMC Management System. This Manual should be read in conjunction with the relevant procedures and with the Department of Finance System Manual.

Rev	Date	Description	Prepared by:	Checked by:	Approved by:
0C	6/08/01	Draft	LMC	DFP, MJS	
1	10/01/08	Revision 1	LM	MS	MJS
2	29/05/08	Revision 2	LM	GB	MJS
3	02/04/09	Revision 3	LM	RH	
4	12/05/10	Review only	LM	MJS	MJS
5	14/09/11	Review and change of Proponent name	LM	MJS	MJS
6	3/09/12	Review & update FMC	LM	MJS	MJS
7	12/08/13	Review & update Figure 1 & TOC	LM	MJS	MJS
8	11/09/14	Correction Fig 2, & update Fig 1	LM	MJS	MJS
9	26/09/15	Update to Fig 1a & 1b	LM	MJS	LM
10	22/10/16	Review – no changes	LM	MJS	LM
11	04/10/17	Review – no change	LM	MJS	LM
12	21/11/18	Update to personnel chart, reformat, renaming of BMW manual	LM	MJS	LM
13	19/11/19	Rebranding, Update to personnel chart	LM	MJS	LM
14	24/02/21	BMW changed to Finance, FMC PM changed to Mark Shepherd	LM	MJS	LM
15	02/11/21	Minor formatting changes	LM	MJS	LM

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FACILITY MANAGEMENT CONTRACTOR IWDF PROCEDURES MANUAL

1. INTRODUCTION

1.1 BACKGROUND

The Department of Finance (Finance) is responsible for carrying out waste management operations at the Intractable Waste Disposal Facility (IWDF), Mt Walton East. A Facility Management Contractor (FMC) is engaged by Finance to undertake operational management of the IWDF, including management of sub-contractors, on behalf of Finance.

1.2 ENVIRONMENTAL HEALTH AND SAFETY MANAGEMENT SYSTEM

The IWDF Environmental, Health & Safety and Quality Management System (EHSQMS) is a management system designed to identify areas of actual or potential environmental and health & safety risks resulting from activities at the IWDF and formulate procedures and objectives which minimise or eliminate these risks. The EHSQMS strives to integrate environmental management into the IWDF's daily management, long term planning and other management systems, and ensure Finance maintains a high level of environmental performance.

The structure of the EHSQMS is given in the *Finance System Manual*.

This Manual represents the organisational structure and procedures adopted by the FMC for the operation and management of the IWDF on behalf of Finance. The FMC System Manual is intended to provide an overview of organisation structure and the structure of the FMC IWDF procedures. This Manual should be read in conjunction with the relevant FMC procedures and with the Finance System Manual.

2. ORGANISATION & RESPONSIBILITIES

2.1 FACILITY MANAGEMENT CONTRACTOR STATUS

Aurora Environmental is currently engaged as the FMC for the IWDF.

2.2 RESPONSIBILITIES

The major tasks and responsibilities of the principal positions within the FMC are detailed in the *FMC Functional and Personnel Charts (Figures 1a and 1b)*.

Further details on competencies, authorities and responsibilities of FMC personnel are addressed in the FMC Management Procedure FMP-03 Training & Competency.

Figure 1a Functional Chart

FMC FUNCTIONAL CHART						
			Project Director			
			Project Manager (Principal Contact)	Support Staff Word processing etc.		
Operational Management	Engineering Management	Administration, Systems & Reporting Management	Technical Subcontractors	Health & Safety Management	Environmental Management	Radiation Management
Excavation	Geotechnical design	Environmental, health & safety & quality management system	Surveyors	Safety Officer / Nurse	Environmental planning	Radiation monitoring
Backfilling	Disposal Cell design	Quality assurance	Chemical analysis	Personnel protective equipment	Environmental monitoring	Radiation safety assessment
Site infrastructure (design & maintenance)	Geotechnology	Hazard evaluation (transport & disposal)	Flora, rehabilitation and fauna assessment		Site Surveys	Radiation safety case
Traffic monitoring	Hydrogeology	Disposal approvals	Technical illustration		Environmental approvals	Approvals – radioactive waste
Site security	Geophysics	Disposal reporting			Chemical analyses and interpretation	Packaging / conditioning radioactive waste
Geology	Excavation stability assessment	Performance & compliance reporting			Community reporting & information	Radiation physics & safety
Community liaison	Geotechnical testing – capping	Training			Community liaison	
Hazardous waste management		Admin & financial management, costing & reporting				
<ul style="list-style-type: none"> • Inspection/ waste quality review • Preparation • Packaging • Transport 						
Disposal		Waste inventory / database Operational & system auditing				

Figure 1b FMC Personnel Chart

FMC PERSONNEL CHART						
Project Director Mark Shepherd						
Project Manager Mark Shepherd						
Operations Manager	Engineering Manager	Administration, Systems & Reporting Manager	Technical Subcontractors	Health & Safety Manager	Environment Manager	Radiation Manager
Mark Shepherd Alternative	TBA Alternative	Leanne Morton Alternative	Pinpoint Drafting Colin Reeves McMullan Nolan Surveyors	TBA	Greg Milner Alternative	Stuart Parr
Greg Milner Leanne Morton	TBA	Mark Shepherd	Analytical Reference Laboratories PGV Environmental Paul van der Moezel	Safety Officer/ Nurse TBA	Leanne Morton Mark Shepherd	
Support Staff Aurora Environmental Technical Assistant TBA						

3. IWDF PROCEDURES

3.1 STRUCTURE OF THE IWDF PROCEDURES

The Facility Management Contractor IWDF Procedures system comprises the following:

- Manual (this document).
- Procedures Index.
- FMC Management Procedures.
- Operational Procedures and Instructions.
- Environmental Procedures and Instructions.
- Radiation Procedures and Instructions.
- Safety Procedures and Instructions.
- Emergency Response Procedures and Instructions.
- Forms.
- Information Sheets.
- Induction Handbooks.

These procedures and instructions define the purpose, scope and methodology of operational activities and tasks associated with the operational management of the IWDF.

Each **Procedure** defines the who, what, where, when, how and why of operational activities and tasks to allow the tasks and activities to be undertaken in a manner acceptable to Finance and in accordance with the IWDF policy statement.

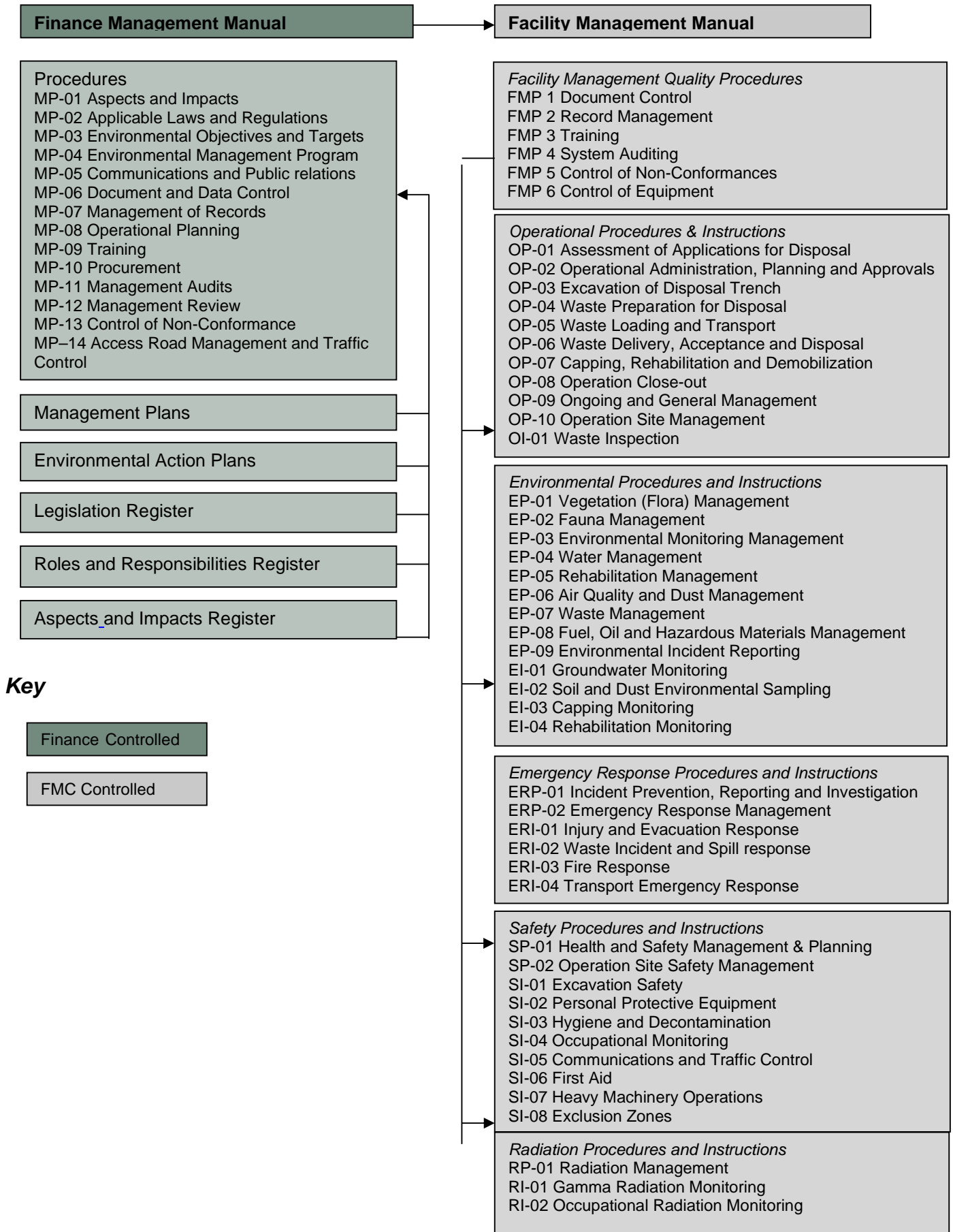
Each **Instruction** provides more specific actions regarding the way in which a particular task should be undertaken.

This system is available electronically.

A flowchart depicting the structure of the procedures and the relationship to the Finance Management Procedures is provided in **Figure 2**.

The context of these procedures in relation to the Finance IWDF Management System is given in Figure 1 of the *Finance System Manual*.

FIGURE 2 IWDF SYSTEMS STRUCTURE



3.2 FINANCE MANAGEMENT PROCEDURES

These procedures define the management of IWDF activities undertaken directly, or coordinated, by Finance, including:

- Identification and Management of Issues (MP-01 Aspects & Impacts, MP-02 Applicable Laws, MP-3 Environmental Objectives & Targets, MP-04 Environmental Management Program);
- System Management (MP-06 Document and Data Control, MP-07 Management of Records, etc.); and
- Operational Management (MP-08 Operational Planning).

These include specification of FMC responsibilities. These specifications have been addressed in the development of the FMC procedures, with reference to applicable Finance Management Procedures, where appropriate.

3.3 FMC MANAGEMENT PROCEDURES

These procedures define the system management of IWDF activities, including document control (FMP-01), record control (FMP-02), training (FMP-03), auditing (FMP-04), control of non-conformances (FMP-05) and equipment control (FMP-06). Many of these procedures are based on requirements specified in similar Finance Management Procedures and, to address these requirements, procedures specific to FMC activities are required. Many of the FMC procedures relate to specific FMC personnel (i.e., other than Finance staff) and the additional physical locations in which FMC activities are carried out.

In cases where Finance procedures exist, but there is no specific FMC Management procedure, the involvement/responsibility of the FMC is either minimal or fully specified in the Finance Management Procedure.

3.4 OPERATIONAL PROCEDURES AND INSTRUCTIONS

These procedures and instructions define operational management of IWDF activities, including specific tasks during the phases of a disposal operation (OP-01 to OP-08 and OP-10) and ongoing management (OP-09). The procedures should act as the first point of reference for operational activities. They refer to more specific environmental, radiation, safety, and emergency response procedures, where further details are required.

The roles, responsibilities and tasks associated with the management of a disposal operation are given in a flowchart presented in Figure 3 – located at end of this manual.

3.5 ENVIRONMENTAL PROCEDURES AND INSTRUCTIONS

These procedures define methods for the effective environmental management of IWDF activities. They address the management of environmental issues identified in the

Environmental Aspects Register and Environmental Management Program for the IWDF (see the Finance System Manual). These procedures provide additional information relevant to the Operational Procedures and are referenced in appropriate Operational Procedures.

3.6 RADIATION PROCEDURES AND INSTRUCTIONS

These procedures define the specific procedures and instructions related to management of radioactive wastes, which are to be disposed at the IWDF. The Radiation Procedure RP-01 Radiation Management addresses the radiation-specific aspects of the operational phases identified in Operational Procedures OP-01 to OP-09.

3.7 SAFETY PROCEDURES AND INSTRUCTIONS

These procedures define the health and safety management of IWDF activities. They address the management of health & safety issues identified in the Health & Safety Management Plan (see the Finance System Manual).

3.8 EMERGENCY PROCEDURES AND INSTRUCTIONS

These procedures define the emergency response management of IWDF activities. They address the management of emergency issues identified in the Emergency Response Management Plan (see the Finance System Manual).

3.9 IWDF FORMS

A series of forms provide proformas for the recording of information and data related to the IWDF activities. These forms are referenced in appropriate procedures and work instructions. They reside in a central location within the electronic system (or in some cases are appended to the procedures themselves).

3.10 INFORMATION SHEETS

A series of sheets provide reference information for key IWDF activities, such as emergency response (e.g., fire, waste spill, injury) and site rules. These sheets are referenced in appropriate procedures and work instructions. They reside in a central location within the electronic system. The sheets can be used as posters at strategic site locations and are also included in induction handbooks.

3.11 INDUCTION HANDBOOKS

A series of proformas have been developed for the presentation of procedures and safety information related to IWDF activities and as personal reference information. They comprise summaries of key operational procedures (e.g., decontamination) and utilise existing Information Sheets, where available. They reside in a central location within the electronic system.

3.12 OPERATION PROCEDURES

In addition to IWDF procedures, Operation Procedures must be referred to during disposal operations (e.g., Operation Environmental Procedures). These documents are generated on an operation-by-operation basis following applicable guidelines (see the Finance System Manual) and include reference to waste-specific quantities, hazards, and controls. These are referred to in the appropriate IWDF procedures and instructions.

APPENDIX O

Aspects and Impacts Register



ASPECTS AND IMPACTS REGISTER – IWDF MT WALTON EAST

DEFINITIONS:

Aspect - an element of the IWDF's operations or activities, which may influence the environment, health, and safety of personnel at the site, or the community.

Impact - any change to the environment, health and safety of site personnel or the public, whether adverse or beneficial, resulting from the IWDF's operations or activities.

Frequent - a desired or necessary activity, which occurs under normal operating conditions, most of the time (e.g., dust monitoring, capping of the trench and unloading of the waste)

Infrequent - a desired or necessary activity, which occurs under normal operating conditions, but not very often (e.g., equipment maintenance/repair)

Emergency- an unplanned, undesirable activity or event (e.g., spill, accident, leak)

Risk - a probability or threat of damage, injury, liability, loss, or any other negative occurrence that is caused by external or internal vulnerabilities, and that may be avoided through pre-emptive action. Determination of risk is based on the product of likelihood and consequence.

Likelihood, consequence and risk ratings are summarised as follows:

LIKELIHOOD (should the proposed controls not be in place)

Likelihood

- 1 Rare (>5-10 years)
- 2 Infrequent (e.g., Yearly)
- 3 Occasional
- 4 Frequent (e.g., Weekly)
- 5 Continual (e.g., Daily)

CONSEQUENCE

Consequence	Descriptor	Environmental	Socio-political	Legal Compliance	Health and Safety
1	Insignificant	Minimal impact on the environment	Little or no community/media interest	Unlikely to be of interest to regulators	No injuries, or loss and damage of property
2	Minor	Short term impact only, to a limited area	Minor local community interest. Perhaps special interest group attention	Requires routine incident report to regulators	Requires first aid treatment
3	Severe	Medium term impact or large area of impact	Rising community concern and local action, media interest	Breach of license or legal infringement, fines possible, non-approval of disposal operation	Requires medical treatment
4	Major	Extensive and significant impact on the environment	High community concern, broad media interest, loss of community confidence and state action	Regulators involved in incident response, high level discussions, large fine, non -approval of disposal operation.	Results in extensive human exposure or injury
5	Catastrophic	Extensive, significant impact with long term effect on the environment	Public outcry, national action, ongoing national/international media interest	Possible court action resulting in huge fines or jail	Results in death

RISK MATRIX

Likelihood	Consequence				
	1	2	3	4	5
5	Significant risk	Significant risk	High risk	High risk	High risk
4	Medium risk	Significant risk	Significant risk	High risk	High risk
3	Low risk	Medium risk	Significant risk	High risk	High risk
2	Low risk	Low risk	Medium risk	Significant risk	High risk
1	Low risk	Low risk	Medium risk	Significant risk	Significant risk

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
Assessment and preparation of waste	Assessment of waste proforma	Waste Hierarchy The waste hierarchy is enshrined in section 5(1)(c) of the Waste Avoidance and Resource Recovery Act 2007 (WARR Act): Disposal of substance which could be recycled, reduced, or re-used. Disposal of waste not generated in WA.	Not best practice Breach of Ministerial Conditions	Emergency	1	1	3	4	1	low	medium	significant	low	Completion of Waste Acceptance Proforma Appropriate review of completed waste acceptance proforma Liaison with waste owners EPA approval of Operation Environmental Waste Acceptance Procedures	MP-08, OP-01
	Solidification of liquid waste	Incomplete solidification	Breach of waste owner agreement	Emergency	1	1	1	3	1	low	low	medium	low	Waste Inspections Ongoing liaison with waste owners Packaging and Transport Guidelines	OP-04, OI-01
			Breach of license and Ministerial Conditions	Emergency	1	1	2	3	1	low	low	medium	low		
			Loss of public confidence	Emergency	1	1	3	2	1	low	medium	low	low		
	Storage of wastes at waste owner premise prior to disposal	Spills	Soil contamination	Emergency	2	3	2	3	1	medium	low	medium	low	Waste Inspections	OP-04, OI-01
			Storm water contamination	Emergency	1	4	3	3	1	significant	medium	medium	low		
			Groundwater contamination	Emergency	1	4	3	4	2	significant	medium	significant	low		
			Air impact	Emergency	2	2	3	3	2	low	medium	medium	low		
			Disturb local flora and fauna	Emergency	1	3	2	3	1	medium	low	medium	low		
	Packaging	Packaging failure or accident resulting in spill	Soil contamination	Emergency	2	3	3	4	1	medium	medium	significant	low	Packaging inspections Packaging Proforma PPE	OP-04, OI-01 OP-05, ERI-04
			Storm water contamination	Emergency	2	3	3	4	1	medium	medium	significant	low		
			Groundwater contamination	Emergency	1	3	3	4	1	medium	medium	significant	low		
			Disturb local flora and fauna	Emergency	2	3	2	3	1	medium	low	medium	low		
			Exposure effects to humans	Emergency	3	1	3	3	4	low	significant	significant	significant		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
		Due to human error a higher activity drum packaged for disposal	Potential inhalation dose to worker	Emergency	1	1	3	3	4	Low	Medium	medium	significant	Packaging supervision by RSO & packaging inspections	OI-01 OP-06
Transport of waste	Handling of waste (unloading and loading)	Spills Due to human error a higher activity drum packaged for disposal	Soil contamination	Infrequent	1	3	3	4	1	medium	medium	significant	low	Operation Transport guidelines OTP OHSERP guidelines Waste specific training Inspection of waste Use of PPE	OP-05, ERI-04, EP-08
			Storm water contamination	Infrequent	1	3	3	4	1	medium	medium	significant	low		
			Groundwater contamination	Infrequent	1	3	3	4	1	medium	medium	significant	low		
			Disturb local flora and fauna	Infrequent	1	2	3	3	1	medium	significant	significant	low		
			Exposure effects to humans	Infrequent	1	1	3	3	4	Low	Medium	Medium	significant		
	Transport on site	Truck fumes	Air Impact	Infrequent	5	1	1	1	1	significant	significant	significant	significant	Operation transport guidelines OTP Decontamination and containment equipment	OP-05 ERI-04 EP-08
		Fuel Leaking	Soil contamination	Infrequent	3	2	2	2	1	medium	medium	medium	Low		
			Storm water contamination	Infrequent	3	3	2	2	1	significant	medium	medium	low		
			Groundwater contamination	Infrequent	1	3	2	2	1	medium	low	low	low		
	Transport off site	Truck fumes	Air impact	Frequent	5	1	1	1	1	significant	significant	significant	significant	Transport operation guidelines OTP Decontamination and containment equipment	OP-05 ERI-04 ERI-03
		Fuel leaking	Soil contamination	Infrequent	3	2	3	2	1	Medium	significant	medium	Low		
			Storm water contamination	Infrequent	3	3	3	2	1	significant	significant	medium	Low		
			Groundwater contamination	Infrequent	1	3	3	2	1	Medium	medium	Medium	Low		
	Accident	Fire	Air Impact	Emergency	3	3	3	2	4	significant	significant	Medium	high	Use of PPE OHSERP Waste specific training Correct equipment present.	ERP-01 ERP-02 ERI-04 OP-05 ERI-05
			Damage to flora and fauna	Emergency	3	3	3	3	1	significant	significant	significant	low		
Spills		Soil contamination	Emergency	3	4	3	3	1	High	significant	significant	low			
		Storm water contamination	Emergency	3	4	3	3	1	High	significant	significant	low			
		Groundwater contamination	Emergency	1	4	3	3	1	significant	Medium	Medium	low			

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure	
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety			
			Disturb local flora and fauna	Emergency	3	3	2	3	1	significant	medium	significant	low			
			Human exposure	Emergency	2	1	3	4	4	low	medium	significant	significant			
	Emergency vehicles accompanying trucks carrying intractable wastes	Reduce impact of accident or emergency		Frequent	5	1	1	1	1	1	significant	significant	significant	significant	Vehicles available	ERI-04 ERP-2 ERP-01 OP-05
			Increase impact of accident or emergency if not suitably equipped, trained or experienced	Soil contamination	Emergency	1	4	3	3	3	significant	medium	medium	medium		
		Storm water contamination	Emergency	1	4	3	3	3	significant	medium	medium	medium				
		Groundwater contamination	Emergency	1	4	3	3	3	significant	medium	medium	medium				
		Disturb local flora and fauna	Emergency	1	4	3	3	3	significant	medium	medium	medium				
Training	Personnel not properly trained	Soil contamination	Infrequent	3	4	2	3	1	high	medium	significant	low	Waste specific training Site induction OHSERP guidelines	OP-05, FMP-03, MP-09		
		Storm water contamination	Infrequent	3	4	2	3	1	high	medium	significant	low				
		Groundwater contamination	Infrequent	1	4	2	3	1	significant	low	medium	low				
		Disturb local flora and fauna	Infrequent	3	3	2	3	1	significant	medium	significant	low				
		Human injury	Infrequent	2	1	2	2	3	low	low	low	medium				
Disposal at IWDF	Trench Construction	Construction impacts	Dust	Infrequent	3	1	1	1	1	Low	Low	low	Low	Records of excavation stability	OP-03,	
			Noise-excessive	Infrequent	2	1	1	1	1	Low	low	Low	Low			
		Process failure	Dust	Infrequent	1	1	1	1	1	1	Low	Low	low	Low	Removed vegetation stockpiled for rehabilitation Dust suppression techniques Stability of trench regularly checked by geologist or geotechnical engineer	
			Noise-excessive	Infrequent	1	1	1	1	1	Low	low	Low	Low			
			Erosion	Infrequent	1	3	2	2	1	medium	low	low	low			
		Operation of drill rig	Overhead hazard/falling objects	Frequent	4	1	1	2	3	medium	medium	significant	significant	Regular safety checks to ensure machinery is safe	ERI-03 SI-07 OP-03 ERP-01	
			Noise	Frequent	5	1	1	1	1	significant	significant	significant	significant	Dust minimization techniques		
			Fire and explosion	Frequent	1	3	3	3	3	medium	medium	medium	Medium	Training		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Dust	Frequent	4	1	1	1	1	medium	medium	medium	Medium	Firefighting equipment	
			Clearing vegetation	Frequent	4	3	2	1	1	significant	significant	medium	medium	Vegetation checked to ensure it is not priority species	
		Personnel not trained	Soil contamination	Infrequent	2	3	2	3	1	medium	low	medium	Low	Induction training	MP-08 FMP-03 OP-03
			Storm water contamination	Infrequent	2	3	2	3	1	Medium	low	Medium	Low	FMC to ensure contractors are qualified for job	
			Groundwater contamination	Infrequent	1	3	2	3	1	Medium	Low	low	Low	Waste specific training	
			Disturb local flora and fauna	Infrequent	3	2	1	2	1	Medium	low	Medium	Low		
			Noncompliance with ISO 14001	Infrequent	3	1	2	2	1	Low	Medium	medium	low		
		Clearance of vegetation	Loss of species	Infrequent	4	3	2	3	1	significant	significant	significant	medium	Removed topsoil and vegetation stockpiled Priority species identified and clearing in that area avoided	EP-01 EI-04 EP-05
		Operation of large excavators and other heavy machinery	Asphyxiation from fumes when working in closed area	Frequent	4	1	2	2	3	medium	significant	significant	significant	Regular safety checks of machinery	SI-07 SI-05 SP-01 SI-01
			Noise	Frequent	5	2	1	1	1	significant	significant	significant	significant	Use of PPE	
			Vehicle accidentally falling into trench from surrounding surface area	Infrequent	4	1	2	2	3	Medium	significant	significant	significant	Personnel appropriately qualified for the job Appropriate windrow / operational bunding construction around trench	
		Use of explosives to blast silcrete	Fire	Frequent	2	3	2	2	1	Medium	low	low	Low	Use of PPE	ERI-03 ERP-01 SP-02 SI-01
			Explosion	Frequent	2	3	2	3	3	Medium	low	medium	Medium	Safety Manager present	
			Falling debris	Frequent	2	1	2	2	3	Low	low	low	medium	Personnel qualified for the job	
			Dust	Frequent	2	1	1	1	1	Low	low	low	low	Firefighting equipment and first aid officer on site	
		Excavation stability	Falling debris/cave-in	Frequent	2	2	2	2	3	Low	low	low	medium	Use of PPE Trench regularly inspected for stability by geologist / geotechnical engineer	OP-03 SI-01
			Falling loads	Frequent	2	2	2	3	3	low	low	low	medium		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Confined spaces-hazardous atmospheres	Frequent	1	1	1	2	2	low	low	low	Low		
			Limited access in an emergency	Frequent	2	1	1	1	3	low	low	low	medium		
	Unloading and waste placement	Accidents such as dropped load, puncturing a drum resulting in spillage of hazardous material or release of radioactivity	Soil contamination	Emergency	2	4	3	3	1	significant	medium	medium	low	Use of PPE Use forklift to unload waste where possible Waste specific training Liaison with earthworks contractors prior to unloading to determine the method of unloading	OP-06 ERP-01 ERP-02 ERI-02
Storm water contamination			Emergency	2	4	3	3	1	significant	medium	medium	Low			
Groundwater contamination			Emergency	1	4	3	3	1	significant	medium	medium	Low			
Dust nuisance			Infrequent	3	1	1	1	4	low	low	low	high			
Potential inhalation dose to worker				2	1	2	2	4	significant	low	low	high			
Vehicle fire resulting in damage to drum and release of radioactivity		Potential inhalation dose to worker		2	1	2	2	4	significant	low	low	high	Training in appropriate Emergency response related to fire	FMP-06 ERI-03 ERI-04	
Personnel not trained properly		Personnel		2	4	2	3	3	significant	low	medium	significant	Waste specific training Site Induction FMC ensure contractors are qualified for their job	MP-09 FMP-03	
Movement impacts		Dust nuisance	Infrequent	2	1	1	1	1	low	low	low	low	Use of PPE	EP-06 EP-02	
	Noise-excessive	Infrequent	2	1	1	1	1	low	low	low	low	Dust suppression techniques	OP-06		
Operation of heavy machinery	Noise	Frequent	5	1	1	1	1	significant	significant	significant	significant	Regular safety checks of machinery	OP-06 EP-06 SI-07		
	Dust	Frequent	5	1	1	1	1	significant	significant	significant	significant	Site safety manager present			
	Road safety-accident resulting in injury	Emergency	2	1	2	2	3	low	low	low	medium	First aid officer present Dust suppression techniques used			

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure	
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety			
		Failure to comply with legislation and other statutory requirements	Non-conformance	Infrequent	3	1	2	3	1	low	medium	significant	low	Audits to ensure compliance with legislation	MP-02 MP-13 FMP-05	
			Environment	Infrequent	3	5	4	4	1	high	high	high	low			
			Prosecution	Infrequent	2	1	4	4	1	low	significant	significant	low			
		Excavation stability	Falling debris/cave in	Frequent	2	2	1	2	2	2	low	low	low	Low	Trench stability checked regular by geologist/ geotechnical engineer	SI-01 OP-06 SP-02
			Falling loads	Frequent	2	3	2	2	3	medium	Low	low	medium			
					Confined space-hazardous atmospheres	Frequent	1	1	1	2	2	low	low	low	low	Use of PPE
	Correct equipment															
	Limited access in emergencies				Frequent	2	1	1	1	3	low	low	low	medium	First aid officer on site	
	Backfilling and capping of trench	Operation of large excavators and other heavy machinery	Noise	Frequent	5	1	1	1	1	1	significant	significant	significant	significant	Regular safety checks on machinery	SI-01 OP-07
			Dust	Frequent	5	1	1	1	1	1	significant	significant	significant	significant	Dust suppression techniques	
			Vehicle accidently falling into trench from surrounding surface area	Infrequent	4	1	2	2	3	Medium	significant	significant	significant	Appropriate windrow / operational bunding construction around trench		
			Road safety-accident resulting in injury	Frequent	2	1	2	2	3	low	low	low	medium	First aid equipment / personnel on site		
		Backfilling impacts	Dust nuisance	Infrequent	3	1	1	1	1	1	low	low	low	low	Dust suppression techniques	EP-06 OP-07
			Noise-excessive	Infrequent	2	1	1	1	1	1	low	low	low	low	PPE	
		Failure to comply with legislation and other statutory requirements	Non-conformance	Infrequent	3	4	3	3	3	3	high	significant	significant	significant	Audits to ensure compliance with legislation	MP-02 FMP-5 MP-13
Environment			Infrequent	3	4	3	3	1	1	high	significant	significant	low			
Prosecution			Infrequent	2	4	3	3	1	1	significant	medium	medium	low			
Personnel not properly trained		Soil contamination	Infrequent	2	4	3	3	1	1	significant	medium	medium	low	FMC ensure contractors are qualified to do job	MP-09 FMP-3 OP-07	
	Storm water contamination	Infrequent	2	4	3	3	1	1	significant	medium	medium	low	Site induction			
	Groundwater contamination	Infrequent	1	4	3	3	1	1	significant	medium	medium	low	Waste specific training			
	Disturb local flora and fauna	Infrequent	3	3	2	3	1	1	significant	medium	significant	low				
Poor construction	Soil contamination	Emergency	2	4	3	3	1	1	significant	medium	medium	low	Sufficient geotechnical testing	OP-07 SP-02		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Erosion of cover	Infrequent	3	4	2	3	1	high	medium	significant	low	Capping record	
		Backfilling incomplete or inadequate	Dust nuisance	Infrequent	3	1	1	1	1	low	low	low	low		
			Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low		
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low		
			Dust nuisance	Infrequent	2	1	1	1	1	low	low	low	low		
Community Input	Failure to get feedback	Public outcry	Infrequent	3	1	2	2	1	low	medium	medium	low	CLC meetings	MP-8	
Contingency and Emergency response	Emergency vehicles	General	Noise excessive	Frequent	5	1	1	1	1	significant	significant	significant	significant	Emergency vehicles on standby Emergency vehicles informed of location and nature of waste	ERP-01 ERP-02 EP-08
		Truck fumes	Air impact	Frequent	5	1	1	1	1	significant	significant	significant	significant		
		Leaks (fuel, oil) or breakdown	Soil contamination	Infrequent	3	2	2	2	1	medium	medium	medium	low		
			Storm water contamination	Infrequent	3	2	2	2	1	medium	medium	medium	low		
			Groundwater contamination	Infrequent	1	2	2	2	1	low	low	Low	low		
			Disturb local flora and fauna	Infrequent	2	2	2	2	1	low	low	low	low		
		Inadequately supplied	Soil contamination	Infrequent	3	4	3	3	1	high	significant	significant	low		
			Storm water contamination	Infrequent	3	5	3	3	1	high	significant	significant	low		
			Groundwater contamination	Infrequent	2	5	3	3	1	high	medium	medium	Low		
			Disturb local flora and fauna	Infrequent	2	5	3	3	1	high	medium	medium	Low		
	Presence of emergency response team	Poor response to emergency	Soil contamination	Emergency	3	4	3	3	1	high	significant	significant	low	Health and Safety and Emergency Response operation procedures Emergency team established and on standby	ERP-01 ERP-02 ERI-01 ERI-02 ERI-03 ERI-04
			Storm water contamination	Emergency	3	4	3	3	1	high	significant	significant	low		
			Groundwater contamination	Emergency	2	4	3	3	1	significant	medium	medium	low		
Disturb local flora and fauna			Emergency	3	4	3	3	1	high	significant	significant	low			

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Air impact	Emergency	3	1	1	1	1	low	low	low	low		
	Training	Poor response to emergency	Soil contamination	Emergency	3	4	3	3	1	high	significant	significant	low	General site induction Waste specific training First aid officer and equipment on site	ERI-04 ERI-03 ERI-02 ERI-01
Storm water contamination			Emergency	3	4	3	3	1	high	significant	significant	Low			
Groundwater contamination			Emergency	2	4	3	3	1	significant	medium	medium	low			
Disturb local flora and fauna			Emergency	3	4	3	3	1	High	significant	significant	low			
Air impact			Emergency	3	1	1	1	1	low	low	low	low			
Emergency equipment	Lack of appropriate equipment	Soil contamination	Emergency	2	3	2	3	1	medium	low	medium	low	Site equipment checked regularly Appropriate equipment is on site	ERP-01 ERP-02	
		Storm water contamination	Emergency	2	3	2	3	1	medium	Low	medium	low			
		Groundwater contamination	Emergency	1	3	2	3	1	medium	Low	medium	low			
		Disturb local flora and fauna	Emergency	2	3	2	3	1	Medium	Low	medium	low			
		Air Impact	Emergency	2	3	2	3	1	medium	Low	medium	low			
		Injured personnel do not get appropriate treatment	Emergency	2	1	2	2	4	low	Low	low	significant			
Emergency facilities	Unaware of location of emergency facilities	Delay in receiving treatment	Emergency	2	1	2	2	4	low	low	low	significant	Emergency numbers readily available on site	ERP-01 ERP-02	
	Emergency facilities unaware of exposure symptoms	Delay in receiving treatment	Emergency	1	1	3	4	5	low	medium	significant	high	Emergency facilities informed of the nature of injuries expected at the site	FMP-03, MP-09 EP-03 EI-01, EI-02, EI-03, EI-04 RI-1, RI-2	
Monitoring	Training	Personnel properly trained	Minimize environmental harm	Frequent	5	1	1	1	1	significant	significant	significant	significant	Monitoring work instructions Equipment regularly tested Monitoring record Personnel trained	EP-03
		Personnel not properly trained	Soil contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low		
			Storm water contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
			Groundwater contamination	Infrequent	1	4	3	3	1	High	significant	significant	low		
			Airborne contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low		
	Management	Monitoring equipment not working	Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Low	Monitoring equipment checked	EP-03
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Low		
			Groundwater contamination	Infrequent	1	4	3	3	1	significant	medium	medium	Low		
			Airborne contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Medium		
	Absence of regular monitoring periods	Soil contamination	Infrequent	3	4	3	3	1	High	significant	significant	low	Monitoring record	EI-01 EI-02 EI-03 EI-04 RI-01 RI-02	
		Storm water contamination	Infrequent	3	4	3	3	1	High	significant	significant	low			Monitoring log
		Groundwater contamination	Infrequent	1	4	3	3	1	significant	medium	medium	Low			
		Airborne contamination	Infrequent	3	4	3	3	1	High	significant	significant	Low			
	Community input/feedback	Failure to develop a relationship	Public outcry if they don't know results of activities	Infrequent	3	1	3	3	1	Low	significant	significant	low	CLC meetings	Management Plan 10
Records and Documentation	Consistent and up to date records	Not maintained resulting in system failures	Poor communication	Infrequent	3	4	3	3	3	High	significant	significant	significant	System audits	MP-07 MP-06 FMP-02 FMP-01
			Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	Low	Management Review Meetings	
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	Medium	Low		
			Groundwater contamination	Infrequent	1	4	3	3	1	significant	medium	Medium	Low		
			Disturb local flora and fauna	Infrequent	2	3	3	3	1	Medium	medium	Medium	Low		
			Noise-excessive	Infrequent	4	1	1	1	1	medium	medium	medium	medium		
			Dust	Infrequent	2	1	1	1	1	low	low	Low	low		
			Air impact	Infrequent	2	5	1	1	1	high	low	low	low		
			Public criticism	Infrequent	3	4	3	3	1	high	significant	significant	low		

Activity	Sub activity	Aspect	Impact	Condition / Duration	Likelihood	Consequence				Risk				Controls	Relevant procedure
						Environment	Socio-political	Legal	Health & safety	Environment	Socio-political	Legal	Health & safety		
	Record management and control	Records lost or destroyed	Public criticism	Infrequent	5	1	2	2	1	significant	significant	significant	significant	Management procedures	MP-07 FMP-02
			Not in compliance	Infrequent	5	1	2	2	1	significant	significant	significant	significant		
Auditing and Reviewing	Waste specification audit	Non-conformance	Non-conformances	Infrequent	3	4	2	3	3	high	medium	significant	significant	Audits undertaken	MP-11 FMP-11 MP-13 FMP-5
	Training	Non-compliance	Soil contamination	Infrequent	3	4	3	3	1	high	significant	significant	low	Corrective Action Request form	
			Storm water contamination	Infrequent	3	4	3	3	1	high	significant	significant	low		
			Groundwater contamination	Infrequent	3	4	3	3	1	high	significant	significant	low		
			Airborne contamination	Infrequent	3	4	3	3	1	high	significant	significant	low		
	Documentation of waste	Non-compliance	Soil contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low	Assessment of waste form	MP-09 FMP-3 FMP-4 MP-11
			Storm water contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low	Clear documentation of waste acceptance prior to disposal using waste inspection checklists	
			Groundwater contamination	Infrequent	2	4	3	3	1	significant	medium	medium	low		
			Air impact	Infrequent	2	4	3	3	1	significant	medium	medium	low		
	Transportation	Non-compliance	Soil contamination	Emergency	2	4	3	3	1	significant	medium	medium	low	OTP guidelines	OP-5 FMP-5 MP-13
			Storm water contamination	Emergency	2	4	3	3	1	significant	medium	medium	low		
			Groundwater contamination	Emergency	1	4	3	3	1	significant	medium	medium	low		
			Disturb local flora or fauna.	Infrequent	3	4	3	3	1	high	medium	medium	low		
Compliance audit	Non-compliance	System failure	Infrequent	3	3	2	3	3	significant	medium	significant	significant	Performance and Compliance report		
Community input and feedback	Failure to get feedback	Public outcry	Infrequent	3	1	2	2	1	low	medium	medium	low	CLC Meeting	Management Plan 10	

APPENDIX P

Legal and Other Requirements Register



Register of Legislative and Other Requirements

Finance shall always endeavour to ensure that the IWDF, Mt Walton East operates in compliance with all applicable environmental, regulatory, and legislative requirements.

To effectively manage all legislative requirements a register of the principal State legislation and the principal Commonwealth legislation has been developed. The register shall be maintained and updated regularly in accordance with MP-02 Applicable Laws and Regulations.

Rev	Date	Description	Prepared by:	Checked by:	Approved by:
1	17/09/01	Draft	LCH	LMC	LM
2	4/10/01	Draft	LCH		
3	1/10/07	Draft	LM	MJS	
4	5/03/10	Draft	LM	RH	
5	5/09/11	Draft	LM	RH	
6	11/08/12	Reviewed and updated	LM	RH	RH
7	09/09/13	Reviewed and updated	LM	RH	RH
8	17/06/14	Review & updated	LM	RH	RH & LM
9	14/04/15	Updated with new ARPANSA docs such as COP for safe transport of Radioactive material	LM	Management Team	MT
10	2/04/16	Updated to reflect changes to Revised Code of Practice for Transport of Dangerous Goods (2015); and Environmental Protection (Controlled Waste) Regulations 2004 (as amended).	LM	MT	MT
11	11/03/17	Updated to include Biodiversity Conservation Act 2016 & SSR-5 & ADG Code 7.5	LM	MT	MT
12	25/06/18	Update to Health Act 1911	LM		
13	19/02/19	Biodiversity Conservation Act 2016 in force as of Jan 2019	LM		
14	12/03/19	Inclusion of Emergency Response legislation	LM		
15	15/11/19	Review in prep for potential disposal	LM	LM	MT
16	21/02/21	Review and update to proponent name	LM	LM	MS
17	10/11/21	Inclusion of Work Health and Safety Act 2020, Heritage Act 2018	LM	MT	MT (16 Dec 2021)



PRINCIPAL STATE LEGISLATION AND OTHER REQUIREMENTS SUCH AS GUIDELINES, STANDARDS AND CODES OF PRACTICE

PDF copies of relevant State legislation can be located at <https://www.legislation.wa.gov.au> or in the IWDF document library legislation folder

TOPIC	LEGISLATION	RELEVANT PROCEDURE
Environmental Protection	<p><i>Biodiversity Conservation Act 2016</i></p> <p>Western Australia achieved an environmental milestone when the Biodiversity Conservation Act 2016 (WA) and its Regulations replaced the 1929 Sandalwood Act and the 1950 Wildlife Conservation Act and establish a new regime for the conservation and protection of biodiversity on 1 January 2019.</p> <p>Some of the key changes to be implemented by the Act include:</p> <p>Listing changes: both species and ecological communities (i.e., naturally occurring groups of plants, animals and other organisms interacting in a unique habitat such as Banksia Woodlands) may now be listed. The Minister may now also list habitats as "critical habitats"</p> <p>Fines: the fines for taking threatened flora or taking, possessing or disturbing threatened fauna have significantly increased.</p> <p>Obligation to report - there is an obligation to report an occurrence of threatened species or threatened ecological communities if found during field work.</p>	EP-02, EP-05
	<p><i>Environmental Protection Act 1986</i></p> <p>An Act to provide for an Environmental Protection Authority, for the prevention, control and abatement of pollution and environmental harm, for the conservation, preservation, protection, enhancement and management of the environment.</p>	All operational and ongoing management environmental procedures
	<p><i>Environmental Protection (Clearing of Native Vegetation) Regulations 2004</i></p> <p>Defined simply, land clearing is the removal of native vegetation. The <i>Environmental Protection (Clearing of Native Vegetation) Regulations 2004 (WA)</i> defines land clearing as the killing or destruction of the removal of, severing of trunks or stems of and the doing of any other substantial damage to any vegetation that is native to Western Australia. Fire breaks at IWDF are exempt.</p>	EP-01, OP-03 A clearing permit is not required for clearing the trench area
	<p><i>Environmental Protection (Controlled Waste) Regulations 2004</i></p> <p>Apply to any wastes that cannot be disposed of at a Class I, II or III landfill site. Controlled wastes also include asbestos, clinical or related waste, tyres and waste that has been immobilised or encapsulated.</p> <p>The DWER regulates the transportation of controlled wastes that may cause environmental or health risks. The Regulations provide for the licensing of carriers, drivers and vehicles involved in the transportation of controlled wastes on public roads.</p>	Transport Guidelines OP-06



	<p>Conservation and Land Management Act 1984</p> <p>An Act to make better provision for the use, protection and management of certain public lands and waters and the flora and fauna thereof, to establish the Conservation and Parks Commission, to confer functions relating to the conservation, protection and management of biodiversity and biodiversity components, and for incidental or connected purposes.</p>	<p>EP-01, EP-02, EP-05,</p>
	<p>Soil and Land Conservation Act 1945</p> <p>An Act relating to the conservation of soil and land resources, and to the mitigation of the effects of erosion, salinity and flooding.</p>	<p>EP-01, EP-05</p>
	<p>Bush Fires Act 1954</p> <p>The Act aims to prevent bush fires by prohibiting or restricting burning periods and outlining permissible activities during the control and extinguishment of bush fires and during bush fire emergencies. The Act allows for prosecution and penalties for non-compliance with the conditions and restrictions of the Act.</p> <p>Text below was extracted from Shire of Coolgardie website <i>Under Section 33 of the Bush Fires Act 1954, everyone is required on or before the first day of November or within fourteen days of your becoming an owner or occupier of land should this be after this day to clear all firebreaks and remove flammable materials from the land owned or occupied by you as specified hereunder and to have the specified land and firebreaks clear of all flammable materials from the first day of November up to the thirty first day of March.</i></p> <p><i>1.Land Outside Town Sites</i></p> <p><i>1.1 All buildings on land which is outside town sites shall be surrounded by two firebreaks not less than two (2) metres from the perimeter of the building or group of buildings and the outer firebreak not less than 200 metres from the inner firebreak.</i></p> <p><i>1.2 The removal of flammable material from the whole of the land between the firebreaks required in paragraph 1.1 above.</i></p>	<p>EP-08, SP-02, ERI-03, ERP-02</p>
	<p>Agriculture and Related Resource Protection Act 1976</p> <p>Weeds</p> <p>The principal legislation is the Agricultural and Related Resources Protection Act 1976 (ARRPA). This Act is administered by the Agriculture Protection Board (APB), which is now incorporated into the Department of Agriculture. Regional Advisory Committees advise the APB on weed and other protection issues within WA and the Board has the authority to declare plants for part or all the State under five different categories. The State's quarantine responsibilities are handled by the Western Australian Quarantine Inspection Service (WAQIS) operating within the Department of Agriculture.</p> <p>Related legislation is the Plant Diseases Act 1989 (PDA). This Act is concerned primarily with pests and diseases. However, weeds are regarded as a form of plant disease under this Act with provisions allowing for plants to be permitted or excluded for quarantine purposes.</p> <p>The Department of Agriculture has a single list of plants which currently</p>	<p>OP-05, OP-06</p>



	<p>operates under the PDA. This list contains permitted and prohibited plants, with any species not on the list being prohibited unless assessed to be eligible for addition to the list.</p> <p>In addition to declared plants under the ARPPA, there is also provision for a shire council to prescribe any plant, other than a declared plant, as a pest plant within its municipality.</p>	
Waste Management	<p><i>Waste Avoidance and Resource Recovery Act 2007</i></p> <p>The primary objective of the WARR Act 2007 is to contribute to sustainability, and to the protection of human health and the environment. It is also designed to help Western Australia to move towards a waste-free society by</p> <ul style="list-style-type: none"> • Promoting the most efficient use of resources, including resource recovery and waste avoidance • Reducing environmental harm, including pollution through waste • Consideration of resource management through avoidance of unnecessary resource consumption and disposal • Resource recovery which includes reuse, reprocessing, recycling and energy recovery <p>The WARR Act 2007 also reflects the principles set out in the Environmental Protection Act 1986 section 4.</p>	Waste Acceptance Guidelines sets out the waste hierarchy - assessment of waste proformas includes consideration of the waste hierarchy
Contaminated Sites	<p><i>Contaminated Sites Act 2003</i></p> <p>The Contaminated Sites Act 2003 (Act) provides a regulatory scheme for dealing with sites that are known or suspected to be contaminated. Among other things, the scheme involves reporting, investigating and remediating such sites. A site is considered contaminated if it has a substance present at above background concentrations that presents or has the potential to present risk of harm to human health, the environment, or any environmental value. One feature of the scheme is that an accurate database of WA's contaminated sites is kept by the Chief Executive Officer (CEO) of the Department of Water and Environmental Regulation (the DWER). Information for the database is obtained (primarily) from persons who have a statutory duty to report known, or suspected, contaminated sites to the DWER. Additionally, any member of the public who is concerned that a site is, or may be, contaminated may voluntarily lodge a report. Certain contaminants are dealt with under different legislation. For example: for radioactive materials - see the Radiation Safety Act 1975</p>	
Dangerous Goods	<p><i>Dangerous Goods Safety Act 2004</i></p> <p>An Act relating to the safe storage, handling and transport of dangerous goods and for related purposes. The Act indicates those activities and substances which require licensing prior to use, storage or transport. The aim of the Act is to reduce or minimise the risk from dangerous goods.</p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p><i>Dangerous Goods Safety (General) Regulations 2007</i></p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p><i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i></p>	OP-04, OP-05, OP-06, OI-01, EP-08



	<p><i>Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007</i></p>	OP-04, OP-05, OP-06, OI-01, EP-08
	<p>Department of Mines and Petroleum, 2010, Storage and handling of dangerous goods — code of practice (2nd edition): Resources Safety, Department of Mines and Petroleum, Western Australia, 111 pp.</p>	OP-04, OP-05, OP-06, OI-01, EP-08
Emergency Response	<p><i>Emergency Management Act 2005 (WA)</i></p> <p>The State EM Plan, the State Hazard Plans (Westplans) and the State Support Plans have been prepared by the State Emergency Management Committee (SEMC) under section 18 of the Emergency Management Act 2005 (WA) (the EM Act) and are consistent with the State EM Policy.</p>	ERP-02, Health & Safety and Emergency Response (Reporting) Guidelines
Radioactive Waste & Radiation Safety	<p><i>Radiation Safety Act 1975</i></p> <p>An Act to regulate the keeping and use of radioactive substances, irradiating apparatus and certain electronic products, and for matters incidental thereto.” The Act sets out the powers and responsibilities of the Radiological Council and describes the licensing and registration requirements for persons who deal with any radioactive substances, irradiating apparatus or electronic products. Licences are normally issued for periods of 1-3 years.</p> <p>Department of Finance must appoint a Radiation Safety Officer (RSO), who is to be approved by the Radiological Council. The RSO provides the initial point of contact with the Radiological Council for all radiation matters.</p>	OP-01, OP-02, MP-08, RP-01, RI-01, RI-02
	<p><i>Radiation Safety (General) Regulations 1983</i></p> <p>Calls up the Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia 1992 (now replaced by new code)</p>	OP-01, OP-02, MP-08, RP-01, RI-01, RI-02
	<p><i>Radiation Safety (Transport of Radioactive Substances) Regulations 2002</i> (Updated 11 Sept 2021)</p> <ul style="list-style-type: none"> Any person who transports radioactive substances in Western Australia must be licensed or work under the direction and supervision of a licensee. Legislation requires the development of a Radiation Protection Programme (i.e., a transport management plan) Some operations may also require a source security transport plan. 	ERI-04, ERP-01, OP-05
Health and Safety	<p><i>Occupational Safety and Health Act 1984</i></p> <p>An Act to promote and improve standards for occupational safety and health, to establish the Commission for Occupational Safety and Health, to provide for a tribunal for the determination of certain matters and claims, to facilitate the coordination of the administration of the laws relating to occupational safety and health and for incidental and other purposes.</p>	SP-01, SP-02, SI-01, SI-02, SI-03, SI-04, SI-05, SI-06, SI-07



	<p><i>Work Health and Safety Act 2020</i></p> <p>The Work Health and Safety Act 2020 (WHS Act) and accompanying regulations will commence in March 2022.</p> <p>The WHS Act provides a framework to protect the health, safety and welfare of workers in Western Australian workplaces, and of other people who might be affected by the work.</p> <p>The WHS Act aims to:</p> <ul style="list-style-type: none"> • protect the health and safety of workers and other people by eliminating or minimising risks arising from work or workplaces • ensure fair and effective representation, consultation and cooperation to address and resolve health and safety issues in the workplace • encourage unions and employer organisations to take a constructive role in improving work health and safety practices • assist businesses and workers to achieve a healthier and safer working environment • promote information, education and training on work health and safety • provide effective compliance and enforcement measures • deliver continuous improvement and progressively higher standards of work health and safety. <p>In furthering these aims, regard must be had to the principle that workers and other persons should be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work as is reasonably practicable.</p> <p>For these purposes, 'health' includes psychological health as well as physical health.</p>	<p>SP-01, SP-02, SI-01, SI-02, SI-03, SI-04, SI-05, SI-06, SI-07</p>
	<p><i>Fire Brigades Act 1942</i></p> <p>For DFES functions under the Fire Brigades Act 1942, see Part VI of the Fire Brigades Act 1942. (26 July 2017)</p>	<p>ERI-03, SP-02</p>
	<p><i>Dangerous Goods Safety Act 2004</i></p> <p>An Act relating to the safe storage, handling and transport of dangerous goods and for related purposes. The Act indicates those activities and substances which require licensing prior to use, storage or transport. The aim of the Act is to reduce or minimise the risk from dangerous goods.</p>	<p>OP-04, OP-05, OP-06, OI-01, EP-08</p>
	<p><i>Dangerous Goods Safety (General) Regulations 2007</i></p>	
	<p><i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i></p>	<p>OP-04, OP-05, OP-06, OI-01, EP-08</p>
	<p><i>Dangerous Goods Safety (Road and Rail Transport of Non-explosives) Regulations 2007</i></p>	<p>OP-04, OP-05, OP-06, OI-01, EP-08</p>
	<p><i>Public Health Act 2016</i></p> <p>An Act to protect, promote and improve the health and wellbeing of the public of Western Australia and to reduce the incidence of preventable illness, and for related purposes.</p>	<p>SP-1, SP-02, SI-02, SI-03, SI-04</p>



Site Activities Infrastructure	<p>Main Roads Act 1930</p> <p>Main Roads administers the Main Roads Act 1930. The primary purpose of the Main Roads Act 1930 is to provide for the construction, maintenance, supervision and management of highways, main roads and secondary roads. Other purposes of the Main Roads Act 1930 include the control of access to highways, main roads and secondary roads.</p>	OP-05, SI-05
	<p>Public Health Act 2016</p>	OP-02
Air Quality	<p>Environmental Protection (Ozone Protection) Policy 1993 No longer in force</p>	EP-06
Water Management and Protection	<p>Pollution of Waters by Oil and Noxious Substances Act 1987 <i>An Act relating to the protection of the sea and certain waters from pollution by oil and other noxious substances discharged from ships and places on land.</i></p>	EP-04, EP-08, EI-01
	<p>Country Areas Water Supply Act 1947</p> <p><i>Provides for the provision of reticulated water to country areas and safeguards water supplies. The Act defines legal boundaries of surface and groundwater drinking water sources and provides for by-laws that protect the water quality of these sources.</i></p>	OP-02, EP-04
	<p>Land Administration Act 1997</p> <p>An Act to consolidate and reform the law about Crown land and the compulsory acquisition of land generally, to repeal the <i>Land Act 1933</i> and to provide for related matters.</p>	OP-09
	<p>Parks and Reserves Act 1895</p> <p>An Act for the control and management of certain land reserved to the Crown.</p>	OP-09
Heritage	<p>Aboriginal Heritage Act 1972</p> <p>An Act to make provision for the preservation on behalf of the community of places and objects customarily used by or traditional to the original inhabitants of Australia or their descendants, or associated therewith, and for other purposes incidental thereto.</p>	OP-02, OP-03
	<p>Heritage of Western Australia Act 1990 (Repealed)</p> <p>An Act to provide for, and to encourage, the conservation of places which have significance to the cultural heritage in the State, to establish the Heritage Council of Western Australia, and for related purposes.</p>	OP-02, OP-03



	<p><i>Heritage Act 2018 (1 August 2021)</i></p> <p>An Act to —</p> <ul style="list-style-type: none"> • recognise the importance of, and promote understanding and appreciation of, Western Australia’s cultural heritage; and • provide for the identification and documentation of places of cultural heritage significance and for the conservation, use, development and adaptation of such places; and • repeal the Heritage of Western Australia Act 1990; and • make consequential amendments to various other Acts, and for related purposes. 	<p>OP-02, OP-03</p>
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PRINCIPLE COMMONWEALTH LEGISLATION AND OTHER REQUIREMENTS

Topic	Legislation	Relevant Procedures
<p>Environmental Protection</p>	<p><i>Environmental Protection and Biodiversity Conservation Act 1999</i></p> <p>The objectives of the EPBC Act are to:</p> <ul style="list-style-type: none"> • provide for the protection of the environment, especially matters of national environmental significance • conserve Australian biodiversity • provide a streamlined national environmental assessment and approvals process • enhance the protection and management of important natural and cultural places • control the international movement of plants and animals (wildlife), wildlife specimens and products made or derived from wildlife • promote ecologically sustainable development through the conservation and ecologically sustainable use of natural resources 	<p>EP-01, EP-02, EP-03, EP-04, EP-05, EP-06, EP-07, EP-08, EI-01, EI-02, EI-08, EI-04</p>
<p>Radioactive Waste</p>	<p>Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia 1992 – now withdrawn by ARPANSA but as this CoP is called up by the Radiation Safety (General) Regulations 1983 it must remain until the Regulations are amended.</p>	<p>RP-01, RI-01, RI-02</p>
	<p>Code for Disposal Facilities for Solid Radioactive Waste (2018)</p> <p>Describes the objectives for protection of human health and of the environment, drawing upon international best practice in relation to radiation protection and radioactive waste safety. The safety case and supporting safety assessment provide the basis for demonstration of safety and for authorisation. This publication, together with the Planned Exposure Code (RPS C-1, ARPANSA 2016), supersedes the Radiation Health Series (RHS) No. 35 Code of practice for the near-surface disposal of radioactive waste in Australia (1992) (NHMRC 1992).</p>	<p>RP-01, RI-01, RI-02</p>



	IAEA (1999) Safety Guide No. WS-G-1.1 Near Surface Disposal facilities for Radioactive Waste – superseded by IAEA Safety Standards Series No. SSG-23	RP-01, RI-01, RI-02
	IAEA (2012) The Safety Case and Safety Assessment for the Disposal of Radioactive Waste IAEA Safety Standards Series No. SSG-23.	RP-01, RI-01, RI-02
	National Radioactive Waste Management Act 2012 An Act to make provision in relation to the selection of a site for, and the establishment and operation of, a radioactive waste management facility, and for related purposes.	
	Nuclear Non-Proliferation (Safeguards) Act 1987 Australia has enacted the Nuclear Non-Proliferation (Safeguards) Act 1987 to ensure that international obligations are met under the Nuclear Non-Proliferation Treaty (NPT). This Act is only concerned with nuclear materials such as uranium, thorium, and plutonium. As there are small quantities of thorium and uranium disposed at the IWDF the facility is required to have in place a 'Permit to Possess Nuclear Material'.	
	Australian Radiation Protection and Nuclear Safety Act 1998 Deals with both safety and security issues related to radiation in areas of medical and industrial applications and continues to deal with significant and ongoing risks to the staff of government agencies and to the community in general.	
	Regulatory Guide: Licensing of Radioactive Waste Storage and Near Surface Disposal Facilities, March 2013	Safety assessment & safety case
Health and Safety	National Code of Practice for the Control of Workplace Hazardous Substances	SP-01, EP-07, OP-04, OP-05, OP-06, SI-04, SI-02, SI-06, SI-03
Transport	Australian Code for the Transport of Dangerous Goods by Road and Rail Edition 7.7, 2020 Electronic only	OP-05
	Code for the Safe Transport of Radioactive Material (2019) This edition of the Code for the Safe Transport of Radioactive Material, RPS C-2 (commonly referred to as the Transport Code) replaces the Code of Practice for the Safe Transport of Radioactive Material (2008) (RPS 2). It adopts the International Atomic Energy Agency Regulations for the Safe Transport of Radioactive Material 2012 Edition (No. SSR-6). It is intended to establish uniform requirements for the transport of radioactive material in Australia by road, rail or those waterways not covered by the Maritime legislation.	ERI-04, ERP-01, OP-05



Dangerous Goods	Class Labels for Dangerous Goods AS 1216-2006	EP-07, OP-04, OP-05, OP-06, SP-01
	Packaging of Dangerous Goods AS2400.21-1986 Withdrawn	EP-07, OP-04, OP-05
	Selection and Use of Emergency Procedure Guides for the Transport of Dangerous Goods AS2931-1999 (current Nov 2021)	SP-02, OP-05, ERP-01, ERP-02
	Dangerous Goods- Initial Emergency Response Guide HB 76.2004	SP-02, ERP-01, ERP-2, ERI-01, ERI-02, ERI-03, ERI-04
	AS 1678.0.0.001-2004 emergency procedure guide – transport - vehicle fire	
	National Code of Practice for the preparation of Material Data Sheets 2 nd edition (NOHSC: 2011 2003)	SP-01, SP-02, ERP-01
Air Quality	Exposure Standards for Atmospheric Contaminants in the Occupational Environment (NOHSC: 3008) 1995 (as amended)	EP-06, SI-04, EI-02
Site Activities	National Standard for the Control of Major Hazardous Facility (NOHSC:2016) 1996	OP-09
	Code of Practice – Excavation 2005 Re-endorsed by Worksafe Feb 2014,2021. It should be noted that this CoP refers to superseded health legislation The document provides practical guidance to prevent occupational injury and disease in all workplaces where excavation and associated earthworks are performed. Excavation work may range from shallow trenching and simple foundation excavation to large and complex excavations for buildings and structures and deep sewers where the risk of serious injury is significant.	OP-03
	AS 1940:2017 The storage and handling of flammable and combustible liquids	
Heritage	Native Title Act 1993	OP-02
Planning & Development	Environmental Protection and Biodiversity Conservation Act 1999	OP-02

APPENDIX Q

2021 – 2022 Management Review Meeting Minutes

MANAGEMENT REVIEW MEETING INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

MINUTES

Date: 16 December 2021
Time: 9.00am to 1.00pm
Venue: Training Room, Dilhorn House, 2 Bulwer St, Perth 6000

Attendance: Eleanor Hopkins (EH): Finance IWDF Project Director
Sze-Wan Ng (SN): Finance IWDF Contract Manager
Mark Shepherd (MS): FMC Project Director
Leanne Morton (LM): FMC Project Manager
Stuart Parr (SP): IWDF Radiation Safety Officer
Emma Savage-Jones (ESJ): Finance

Apologies: No apologies

Meeting Number: 15

1. Open and Welcome

LM welcomed those present at the 15th IWDF Management Review Meeting (MRM).

LM circulated, via email, the draft agenda seeking input on 2 December 2021 and the final agenda was circulated to all participants on 13 December 2021.

2. Minutes of the Previous Meeting

The draft of the minutes of the previous MRM meeting held, 3 June 2021, were sent via email to those present at the 10 June 2021 meeting. No feedback was received, and the draft was finalised and accepted as a true and accurate record on 15 June 2021. The Community Liaison Committee (CLC) were informed at the CLC meeting, held 10 June 2021, that the minutes of the MRM, held 3 June 2021, were available on request. Requests were received from Jan McLeod and Anna Killigrew who were both provided with hard copy of the minutes at the CLC meeting held 14 October 2021.

3. Business Arising from Previous Meeting

3.1 Workshop with Radiation Health Unit to Discuss the Remaining Discrepancies between the Radiation Health Database and IWDF Records in the Waste Inventory Database

A workshop, attended by Duncan Surin (Radiation Health Unit), SP and MS was held 17 to 19 November 2021 at Radiation Health Unit (RHU) Royal Street, East Perth. LM attended the workshop on 19 November. A summary of workshop activities is provided below.

- SP and MS were given access to the Radiological Council of Western Australia (RCWA) IWDF records for review, with the primary aim of resolving data discrepancies.
- Discrepancies or inconsistencies between the Radiation Health Branch (RHB, now RHU) store database printout and the IWDF Waste Inventory database line items were reviewed and discussed. Many items, especially items from the 1992 and 1994 radioactive waste disposals, included information extracted from RHB data describing what was in the RHB store at the time.
- Some agreement on inconsistencies for final source activities was reached (e.g., 370 GBq for 4xAm-241 smoke detectors was unreasonable, also the same activity in the same line item was greater than that recorded as the total for the drum).
- It was agreed that the comment/note in the Comments Field of the IWDF Waste Inventory database would be amended from “RHS Database” to “Historical RHS Data”.
- It was agreed, and subsequently recommended to RHU personnel, that as the data in RHS for the store is not complete that the data be removed and/or archived. The one source of truth for the IWDF data will be that discussed and agreed at the workshop and the outcomes of the subsequent data checks.
- The next step is for SP and LM to review against any information contained in the Historical RHS Store Data. Although this dataset is not complete, some information contained in the data may support assumptions made to resolve the data discrepancies.
- Another meeting may be held regarding any final queries, including having RCWA officers search for historical disposal permit records. This will be organised later if necessary.

3.2 IWDF Waste Inventory Database

The Department of Finance (Finance) is planning on upgrading the server that the IWDF Waste Inventory Database is on from SQL 2008 to 2019. This was originally planned for September/October 2021 but has now been rescheduled to early 2022. Before the IWDF Waste Inventory database is migrated to the production SQL 2019 server, testing will be undertaken by FMC personnel in the SQL 2019 test server.

There is still some work to be done in expanding the chemical summaries for the 2000, 2002 and 2008 disposal operations. This work will be completed after the server upgrade.

An example of the publicly available spreadsheet to be published on the IWDF webpage on WA.gov.au has been provided to the RCWA for their feedback. Once RCWA has provided its feedback, the public data will be added to the IWDF webpage on WA.gov.au.

3.3 Long-term Custodianship of the IWDF Waste Inventory Database

The issue of long-term custodianship of the IWDF Waste Inventory Database was discussed with Duncan Surin, a representative of RCWA, at the workshop held 17-19 November 2021. It is the view of the RCWA that Finance should remain as the custodian of the database, as per the conditions of the RCWA registration, for as long as the Minister for Works is the proponent for the IWDF.

There is a requirement under the *Radiation Safety (General) Regulations 1983* that a radioactive material inventory is retained by a Registrant. As the IWDF Waste Inventory Database, which includes the inventory for radioactive waste disposed, will become that record, then the onus is placed on the Registrant to ensure that it remains current. However, RHU would also like access to the full database when released for auditing purposes.

3.4 Record Keeping

It was reported that Finance is progressively re-organising the historical data/documents relating to the IWDF. Finance is also continuing to record IWDF documents in the Department's records management system (Hewlett Packard Enterprise Records Manager also known as HPE Records Manager).

3.5 Legal Deposit

LM has consulted with various librarians at the State Library, and it has been agreed that the relevant documents (Progress and Compliance Reports (PCRs) (post 2008), Handbooks (all versions) and brochure (all versions) will be provided to the State Library in late February 2022 to allow time for the finalisation of the 2020 – 2021 PCR. The State Library would prefer to receive all documents at the same time.

Action: LM to provide all appropriate copies of IWDF documents to the State Library when the 2020 – 2021 PCR is complete.

3.6 Finance IWDF Website Content

The IWDF Handbook and 2-page brochure are available on the IWDF webpage on WA.gov.au.

The IWDF Handbook was updated in September 2021 and the new version was uploaded to the website. The following changes/corrections were made:

- Document Control table updated with new version number (16).
- Table of Contents updated to reflect changes to body of document.
- Page 5 No 4 – ‘Basement’ corrected to ‘basement’.
- Page 10 - governance structure figure replaced with new figure.
- Page 18 – first paragraph updated as below

The conditioning and packaging requirements for disposal of low-level radioactive waste at the IWDF exceed international standards. Conditioning and packaging are supervised by the IWDF Radiation Safety Officer (RSO), the FMC Project Manager, and where appropriate personnel from the Radiation Health Unit (was previously “Section” but replaced with Unit” as is the current Department of Health naming convention) of the Health Department. Each item of low-level radioactive waste is carefully identified, measured, and recorded under strict supervision. The conditioning and packaging of the radioactive waste is then undertaken in accordance with the RCWA approved methodology.

- Page 29 – 2020 Photo Location 3 image replaced with correct image.
- Page 32 – 92RS02 replaced with 94RS01 (this cell was originally named 92RS02 (92 being the year the cell was excavated). The cell was subsequently referred to as 94RS01 (when waste was disposed) so for consistency all reference to this cell should now be 94RS01.
- Page 45 - Section 9, Title of this section changed from “Glossary” to “Glossary and abbreviations” CLC has now been included in the list.

No changes have been made to the 2-page brochure.

The IWDF Waste Inventory spreadsheet has not yet been uploaded to the IWDF webpage, as feedback has not been received from RCWA regarding the information contained within the spreadsheet.

4. IWDF Management Systems

LM reported and demonstrated to those present that all the document control matrices and registers have been reviewed and updated, where required, just prior to the MRM.

4.1 Environmental, Health & Safety and Quality Policy Review

The Environmental, Health & Safety and Quality Policy was reviewed by the IWDF Management Team.

The Management Team agreed that the policy remains suitable, and it was endorsed by the Finance IWDF Project Director during the meeting.

4.2 IWDF Management Plans

LM reported that a review of the Management Plans was undertaken in November 2021 and the following changes were made:

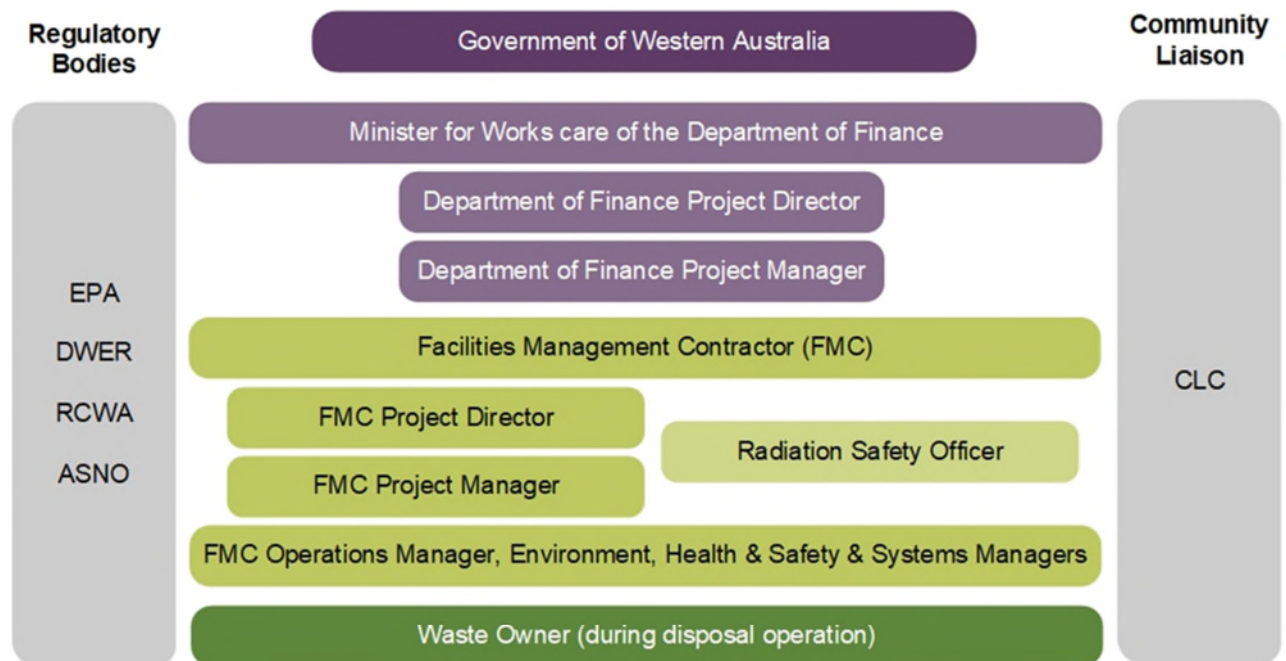
- General formatting changes to all plans, update to dates for monitoring events etc.,
- Policy statement updated to reflect current naming conventions for EHSQMS in plans 3,4,5,7,8, and 11.
- Plan 4 - Where improvement plans were completed, action was moved to Management Program for ongoing maintenance.
- Plan 9 - Updated item in Management Target section – see below for update,
 - Wastes that are in the following categories are not accepted, without prior conditioning, at the IWDF:
 - Free liquid or sludge (except in small volumes)
 - Explosive materials
 - Highly flammable materials
 - Highly reactive or chelating agent materials
 - Compressed gases (greater than 5% by waste volume)
 - Materials that may decompose
 - Toxic, pathogenic, or infectious radioactive materials.
- Plan 10 - Where improvements plans were completed, action was moved to Management Program for ongoing maintenance.
- Plan 11 - New Improvement Plan item - Submit annual PCRs to State Library to fulfil legal deposit requirements. Legal Deposit Regulations 2013 for print and other non-online publications including audio-visual came into force on 1 January 2014.

4.3 Management Manuals

The Finance and FMC management manuals were reviewed by the Management Team.

The Governance Structure figure, as used in the Finance Management and Policy Manual was updated by SN in September 2021. The new figure is shown below. The updated figure has been included in the following documents for consistency:

- Finance Management and Policy Manual.
- IWDF Handbook (V16).
- Draft 2020 - 2021 Performance and Compliance Report.



Acronyms

- EPA: Environmental Protection Agency
- DWER: Department of Water and Environmental Regulation
- RCWA: Radiological Council of Western Australia
- ASNO: Australian Safeguards and Non-proliferation Office
- CLC: Community Liaison Committee

4.4 Registers

LM reported that the Aspects and Impacts and Legislative and Other Requirements Registers had been reviewed in November 2021. The only significant change made was to the Legislative and Other Requirements Register with the inclusion of the *Work Health and Safety Act 2020*.

The *Work Health and Safety Act 2020* (WHS Act) and accompanying regulations will commence in March 2022.

The review of system procedures has considered the requirements of the above legislation. No material changes were required

4.5 Finance EHSMS and Procedures

All Finance procedures have been reviewed and where applicable updated. No significant changes were made to these procedures except for:

MP-07 - Requirements for Legal Deposit now included in Section 6 – Reporting.

MP-10 - Updated to align with the Western Australian Procurement Rules

4.6 FMC EHSMS & FMC Procedures

FMC procedures were reviewed and updated, as required, during November 2021. No significant changes were made.

4.7 Performance and Compliance Reporting

A draft copy of the 2020 - 2021 PCR was reviewed electronically by the Management Team. The 2020 - 2021 PCR will be finalised by the end of February 2022. Finalisation of the report is waiting on RCWA acceptance of the content of the publicly available spreadsheet which will be included as an appendix in the report.

4.8 Annual review of Finance R&D Schedule

SN confirmed she had reviewed Finance's Retention and Disposal Schedule and found it satisfactory.

The Finance records management team have advised that the schedule was updated in 2020 and is not due for review until 2025.

5. 2020 – 2021 Action Plans

LM reported that to date performance against the 2021 – 2022 Action Plans was good. There were several outstanding issues, but the resolution of these issue was beyond the control of Finance. Most issues remain with the RCWA.

6. Compliance Audits Internal and External

6.1 Ministerial Statement

A six-monthly compliance audit against Ministerial Statement 562 was completed. **No** non-compliances were recorded.

A CLC meeting was held on 14 October 2021. Meetings are scheduled for 10 February and 9 June 2022. The proponent will be non-compliant with the requirement to convene a minimum of four CLC meetings during the reporting period unless a variation to the

meeting frequency, from four meetings to three meetings, is approved by the EPA prior to the end of the reporting period.

It was agreed that a submission to the EPA would be made as soon as possible.

6.2 Licences, Permits and Registrations

No auditing has been undertaken since June 2021.

6.3 Finance Management System

No auditing has been undertaken since June 2021.

6.4 FMC Management System

No auditing has been undertaken since June 2021.

6.5 Management Plans

No auditing has been undertaken since June 2021.

6.6 Ongoing Suitability of Management Plans

Given the ongoing review undertaken over the past six months and the subsequent applicable changes made to the various system documents it was concluded by the IWDF Management Team that the management plans and other system documents continue to be fit for purpose.

6.7 External Compliance Audit

The report for the five yearly technical compliance audit, completed by Andrew McCormick of the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) between 22-24 October 2018, was received from ARPANSA on 9 June 2021.

The report recorded two partial non-compliances and made five recommendations. The partial non-compliances and recommendations, as extracted from the audit report, are provided below:

Non-compliances

NC 1. Dose constraints shall be applied to the waste disposal system to ensure that individual dose limits are not exceeded. Such constraints shall apply where individuals may be exposed to other potential, or actual, sources of radiation, excluding natural background or medical sources (relates to paragraph 2.2 of RHS 35). *This only applies to a dose constraint for the public as a dose constraint has been implemented for workers.*

LM reported that a public dose constraint was included in *Occupational Radiation Monitoring Instruction RI-02* in January 2020. Monitoring is now being undertaken. See Section 10.4 of these minutes for the monitoring results.

NC 2. Each disposal structure shall be accurately located and surveyed. Appropriate permanent surface and below-ground markers shall be put in place to define the boundaries and locations of disposal structures (relates to paragraph 3.1f.) of RHS 35). *This only applies to below-ground markers as surface markers are in place and disposal locations have been recorded.*

It was noted that below ground markers may no longer be a requirement under the 2018 Code for Disposal of Solid Radioactive Waste (RPS C-3) therefore, the use of below ground markers for future radioactive disposals would need to be discussed with RCWA.

It was agreed that the preparation of a report discussing below ground marker options should be put on hold until the issue has been discussed with RCWA.

Recommendations

R1. Consider and document, particularly with regard to long-term safety, the appropriateness of the emplacement of both chemical and radioactive waste in the same trenches.

R2. Consider and document the role performed by the fencing around the disposal cells and identify the need to continue to monitor the condition and effectiveness of the fencing.

R3. The previous safety assessment documents should be compiled, reviewed, and revised to create the basis of a new safety assessment that is further developed to comply with current best practice in the field of near-surface radioactive waste disposal; taking into account modern best practices in radioactive waste management (e.g., IAEA SSG-23). Specifically, this should include:

- a. The development of a post-closure safety assessment, using site specific data and scenarios, the results of which are integrated into the existing safety case (this relates to paragraph 2.3 of RHS 35).
- b. Re-assess possible post-closure exposure scenarios due to the Facility and consider the possibility of potential sources of exposure not considered when deriving the generic activity concentration limits given in RHS 35 (this relates to paragraph 2.6.3 of RHS 35). These should be used to assess potential doses due to the facility, which can subsequently be used to inform activity concentration limits for the Facility.
- c. Re-examine the limit (or lack thereof) on the total radionuclide activity for the disposal facility by performing a quantitative evaluation of exposures that might result from the analysis of scenarios during the post-closure phase (e.g., leaching and dispersal of radioactive contaminants by groundwater) (this relates to paragraph 2.6.4 of RHS 35).



- d. Review whether a dose constraint for members of the public should be applied. It is acknowledged that there is currently no public population nearby. However, should demographics change in the future it may be useful to have such a dose constraint in place (this relates to paragraph 2.2 of RHS 35).
- e. Re-evaluate whether doses predicted due to post-closure exposure scenarios are acceptable at timeframes consistent with the current institutional control period (ICP) or whether the ICP needs to be reconsidered (this relates to paragraph 2.3 of RHS 35).
- f. Consider preparing documentation, if not already in existence, analysing the behaviour of the cement matrix with regard to:
 - i. Its ability to maintain its structure under compressive loads and possible structural changes in the waste body; and
 - ii. Its ability to comply with stability requirements and protect against inadvertent intrusion (this relates to paragraph 2.6.5 of RHS 35).
- g. Consider including an analysis of the engineered barriers in the waste body and the disposal facility and the role they play in achieving the safety objective in the post-closure safety assessment. This can be used to decide upon appropriate monitoring actions during operation and post-closure of the Facility (this relates to paragraph 3.1(c) of RHS 35).
- h. As part of the post-closure safety assessment, the design of the disposal trench is considered. Specifically, whether engineered drainage should be used for future disposal trenches (this relates to paragraph 3.1(h) of RHS 35).
- i. It is recommended that an assessment of possible exposure pathways be undertaken. This can result from a post-closure safety assessment and be used to decide upon appropriate monitoring actions during operation and post-closure of the Facility (this relates to paragraph 3.2.4 of RHS 35).

R4. Consideration of whether appropriate below-ground warning markers should be put in place to help prevent inadvertent access to the waste forms (this relates to paragraph 3.1f) of RHS 35). *See Non-compliance 2.*

R5. Consider putting further effort into the database recording details of the radioactive materials disposed at the site. The database should aim to be complete and an authoritative record of disposal campaigns. It could explicitly include the category of radioactive waste (i.e., A, B or C) for each drum (this relates to paragraph 4.6.1(a) of RHS 35).

LM reported that recommendation R5 was addressed during the development of the IWDF Waste Inventory Database. The category of radioactive waste (A, B or C) is a separate field in the database and all items have been allocated the appropriate category.

6.8 Liaison with National and International Intractable Waste Management Facilities

LM reported that the following information sources are regularly reviewed for information that may have an impact on the operational processes for the IWDF:

- IAEA (International Atomic Energy Agency) Weekly News
- Waste Management Journal

LM also reported that the websites for similar facilities are reviewed regularly to ensure that any changes to the operational processes for these facilities is considered against the current operation processes for the IWDF and where appropriate changes are made to the procedures for the IWDF to ensure continual improvement and best practice.

7. Non-conformance and Corrective Action Requests

There are no outstanding Corrective Action Requests (CARs) from previous audits. There were no non-compliances resulting from compliance audits completed July to December 2021 and therefore no CARs were raised during this reporting period. No other changes to the IWDF Management Systems were requested during this reporting period.

8. Electronic Document Library

LM reported that the electronic Document Library had been updated to include the following legislation:

- ***Heritage Act 2018*** (1 August 2021)

An Act to:

Recognise the importance of, and promote understanding and appreciation of, Western Australia's cultural heritage;

Provide for the identification and documentation of places of cultural heritage significance and for the conservation, use, development, and adaptation of such places;

Repeal the Heritage of Western Australia Act 1990; and

Make consequential amendments to various other Acts, and for related purposes.

- ***Work Health and Safety Act 2020*** (10 Nov 2020)

The Work Health and Safety Act 2020 (WHS Act) and accompanying regulations will commence in March 2022.

The WHS Act provides a framework to protect the health, safety, and welfare of workers in Western Australian workplaces, and of other people who might be affected by the work.

The WHS Act aims to:

- protect the health and safety of workers and other people by eliminating or minimising risks arising from work or workplaces
- ensure fair and effective representation, consultation, and cooperation to address and resolve health and safety issues in the workplace
- encourage unions and employer organisations to take a constructive role in improving work health and safety practices
- assist businesses and workers to achieve a healthier and safer working environment
- promote information, education and training on work health and safety
- provide effective compliance and enforcement measures
- deliver continuous improvement and progressively higher standards of work health and safety.

In furthering these aims, regard must be had to the principle that workers and other persons should be given the highest level of protection against harm to their health, safety and welfare from hazards and risks arising from work as is reasonably practicable. For these purposes, 'health' includes psychological health as well as physical health.

- ***WHS Act 2020 overview document***
- ***Soil and land Conservation Act 1945 (as at 1 Aug 2021)***
- ***Radiation Safety (Transport of Radioactive Substances) Regulations 2002 (11 Sept 2021).***

LM reported that, where appropriate, superseded versions of legislation have been deleted from the electronic document library.

9. Guidelines – Updates and Changes

The following guidelines have been updated during the reporting period.

- Chemical Guidelines – waste acceptance proforma has been converted to a PDF fillable form (Revision 15).
- Radioactive Guidelines – waste acceptance proforma has been converted to a PDF fillable form (Revision 18, December 2021).

10. Monitoring

10.1 Groundwater Monitoring

Groundwater monitoring for October 2021 has been completed and no groundwater has been detected in any of the monitoring bores.

10.2 Capping Monitoring

Capping monitoring was completed in October 2021 with no capping issues reported.

10.3 Rehabilitation Monitoring (Annual)

Rehabilitation monitoring was completed October 2021. It should be noted that the October 2021 rehabilitation monitoring did not include the disposal cells established prior to 2000 as the rehabilitation for these cells has been assessed by a botanist and deemed complete.

10.4 Dose Constraint Monitoring

Monitoring of personnel, when on site, using Thermo-Luminescent Dosimeter (TLD) badges, as provided by Landauer Australia, has been conducted for the period April 2021 to December 2021. This monitoring encompasses 3 separate site visits to undertake surveillance and monitoring of the site. Dose exposure data is available for the April to September 2021 period.

Results returned a dose exposure that was below the Minimum Detection Level (MDL) of 0.01 mSv for each quarter. A public dose constraint has been set for the IWDF of 0.3 mSv/year in line with IAEA and ARPANSA guidance. Dose exposures are well below the dose constraint to date.

11. IWDF Infrastructure

11.1 Access Road - Current Management Status Report

ESJ advised that during August 2021, Arc Infrastructure, the company that manages the State's Perth to Kalgoorlie railway line, installed flashing lights and boom gates at the level crossing where the Perth to Kalgoorlie railway line intersects with the IWDF Access Road.

11.2 Access Road - Current Condition Report

MJS reported that the Access Road, as assessed in October 2021, was in good condition.

11.3 Replacement Infrastructure at the IWDF

MS reported that:

- a new generator has been installed at the IWDF;
- a double skinned fuel tank has been installed at the IWDF;
- the UV lamp for water sterilisation in the water tank had been replaced and a spare UV lamp was purchased for future replacement; and
- the old genset had been transported off-site.

MS also reported that the new genset and double skinned fuel tank were working well. MS commented that he would follow up on whether the old genset can be auctioned off in its current condition.

Action: MS to follow up on whether the old genset can be auctioned off in its current condition.

12. Staff Training

LM reported that IWDF background and management system training was completed for EH and SN on 26 July 2021 and EH and SN visited the IWDF on 13 October 2021.

13. Radioactive Issues

13.1 IWDF Safety Assessment & Operations Safety Case

A high-level review of the IWDF operational safety assessment was received from ARPANSA on 15 October 2020. The review was considered by the IWDF Management Team, and a high-level response was prepared.

The structure of the proposed IWDF Safety Case, based on the latest 2018 Disposal Code, has been provided to the RHU. The RHU have accepted the proposed structure of the safety case. This will include historical evidence for siting and construction of the IWDF, operations and the post-closure safety elements. The 2016 Operations Safety Assessment and Safety Case will be reviewed to ensure that it meets international best practice and is up to date with current methodology.

13.2 IWDF Post-Closure Safety Assessment & Post Closure Safety Case

The post-closure safety assessment is in the early stages of assessment and will be based on the potential for external events to impact upon the site, e.g., seismic event. The assessment will demonstrate through deterministic and probabilistic assessments that the dose consequences and risks will be acceptable for the public and the environment during the Institutional Control Period (ICP) of 100 years.

14. Community Liaison Committee

14.1 Discussion – Meeting Dates and Issues Raised by CLC During Meetings Held since June 2021

CLC meetings continue to be held, with the last meeting held on 14 October 2021. The next meetings are scheduled for 10 February and 9 June 2022.

The CLC have requested a visit to the IWDF. EH and SN are preparing a Briefing Note to senior executives to seek approval for a CLC site visit.

With budget pressures in mind, it was agreed that only one FMC staff member would be required for the site visit. MS will attend the site visit and he will drive the bus transporting CLC members to site.

Finance will investigate the various date options and notify the CLC and the FMC when a decision is made.

14.3 Meeting Frequency

Finance will prepare a submission to the EPA requesting approval to reduce the meeting frequency from a minimum of four times a year to a minimum of three times a year.

15. FMC Performance

15.1 Performance against FMC 2021 - 2022 estimated costs

SN reported that performance against the 2021-2022 FMC cost estimate was on track.

15.3 FMC performance against Finance contract management plan.

SN reported that performance against the Action Plan and Task Calendar was good. Where there were outstanding items, this has been due to external factors such as awaiting RCWA approval. Finance is also satisfied with the quality and timeliness of communications from the FMC.

SN noted that the completion of action items from the Ongoing Environmental and Operational Meetings (OEOM) could be timelier. SN will send a monthly reminder to assist with this.

16. Other Business

16.1 Reporting to Radiological Council

LM reported that, to date, all IWDF PCRs had been provided to the RCWA except for the yet to be completed 2020 – 2021 PCR.

Action: LM to send a copy of the 2020 - 2021 PCR to RCWA as soon as it is finalised.

16.3 Change of Proponent Submission to EPA

Finance submitted a form to change nominated proponent under Section 38(6a) of the *Environmental Protection Act 1986* to the Registrar of the Department of Water and Environmental Regulation (DWER) on 13 October 2021.

The Department of Finance requested a change to the nominated proponent on Ministerial Statement 562 – Intractable Waste Disposal Facility, Mt Walton East, Shire of Coolgardie from ‘Department of Finance, Building Management and Works’ to ‘Minister for Works C/- Department of Finance’.

This change was proposed for the following reason.

The Minister for Works is the relevant body corporate with the statutory authority, as an agent of the Crown in right of the State, to carry out the functions relevant to the DWER licence.

The Department of Finance is the Government agency responsible for assisting the Minister for Works in the administration of the Public Works Act 1902 (WA).

SN reported that the *Environmental Protection Act 1986* (EPA Act) was amended on 23 October 2021, resulting in a change to the EPA’s internal process to review a request to change the nominated proponent. Finance’s request will be the first to undergo the new process and EPA Services have advised that there may be delays as a result.

16.4 DWER Licence Renewal

The DWER licence renewal application for the IWDF was submitted to DWER on 16 November 2021.

DWER advised Finance that the new licence may include additional conditions and the annual licence fee may no longer be waived. DWER is progressing the renewal and will provide Finance with an indication of what the new licence and fee structure may look like.

16.5 Disposal applications

The status of waste enquiries and applications is provided below.

Stage of progress	Radioactive	Chemical
Approved applications	3 (partial)	0
Applications under assessment	1	0
Applications awaiting assessment	0	0
Waste enquiries in progress	2	0

Partial – some radioactive wastes declared for disposal will require further justification and resubmission to the Radiological Council.

17. Next Meeting

To be scheduled for June 2022.

MANAGEMENT REVIEW MEETING INTRACTABLE WASTE DISPOSAL FACILITY, MT WALTON EAST

MINUTES

Date: 02 June 2022
Time: 9.30 am to 2.00 pm
Venue: Board Room, Dilhorn House, 2 Bulwer St, Perth 6000
Attendance: Eleanor Hopkins (EH): Finance IWDF Project Director
Sze-Wan Ng (SN): Finance IWDF Contract Manager
Mark Shepherd (MS): FMC Project Director
Leanne Morton (LM): FMC Systems Manager
Stuart Parr (SP): IWDF Radiation Safety Officer
Apologies: No apologies
Meeting Number: 16

1. Open and Welcome

LM welcomed those present at the 16th IWDF Management Review Meeting (MRM).

LM circulated, via email, the draft agenda seeking input on 26 May 2022 and the final agenda was circulated to all participants at the start of the meeting.

2. Minutes of the Previous Meeting

The draft of the minutes of the previous MRM meeting held, 16 December 2021, were sent via email to those present at the 16 December 2021 meeting. The draft minutes were finalised and accepted as a true and accurate record on 28 January 2022.

The Community Liaison Committee (CLC) were sent, via email, a copy of the finalised MRM minutes on 28 January 2022. Hardcopy was posted to Jan McLeod on 28 January 2022.

3. Business Arising from Previous Meeting

3.1 IWDF Waste Inventory Database

The Department of Finance (Finance) is planning to upgrade the server that the IWDF Waste Inventory Database is stored on from SQL 2008 to SQL 2019. This upgrade was originally planned for September/October 2021 but was rescheduled to 2022.

The upgrade was attempted Friday 20th May 5 pm to Sunday 22nd May 6 pm however there were issues with the report's server, and a solution could not be found. The issues only occurred in the production environment and was thoroughly tested in the test environment without issues. As a solution could not be found the production environment was rolled back to the 2008 environment. Microsoft engineers continue to investigate the issues and will hopefully find a solution to implement when this migration is attempted in the future.

As reported at the last MRM, there is some work to be done in the Waste Inventory Database to expand the chemical records for the 1996, 1998, 2000, 2002 and 2008 disposal operations. Also, some work is still required on some of the radioactive records to modify record sections. This work has been delayed due to some issues with updating the database. Work on resolving these issues is ongoing.

3.2 Change of Proponent

Finance submitted a form to the Registrar of the Department of Water and Environmental Regulation (DWER), on 13 October 2021, to change the nominated proponent under Section 38(6a) of the *Environmental Protection Act 1986*.

The Department of Finance requested to change the nominated proponent on Ministerial Statement 562 (Intractable Waste Disposal Facility, Mt Walton East), from the Department of Finance, Building Management and Works to the Minister for Works C/- Department of Finance.

This change was proposed for the following reason:

The Minister for Works is the relevant body corporate with the statutory authority, as an agent of the Crown in right of the State, to carry out the functions relevant to the DWER licence. The Department of Finance is the Government agency responsible for assisting the Minister for Works in the administration of the *Public Works Act 1902 (WA)*.

The Minister for Environment issued a *Notice of Revocation of a Proponent and Notice of Nomination as Proponent*, under Section 38I of the *Environmental Protection Act 1986*, on 21 January 2022, approving the change of proponent.

The Notice was also sent to:

- The Environmental Protection Authority (EPA);
- Director General, DWER;
- Chief Dangerous Goods Officer, Department of Mines, Industry Regulation and Safety; and
- Secretary, Radiation Council.

3.3 DWER Licence Renewal – Status Update

The DWER licence renewal application for the IWDF was submitted to DWER on 16 November 2021. The licence had an original expiry of 17 February 2022, however, given

the time DWER requires to assess the licence renewal application, DWER proposed to extend the expiry by 6 months to 17 August 2022. Finance accepted the proposed amendment, and the licence expiry date was formally extended on 9 February 2022.

In addition, Finance sent a letter to DWER on 3 February 2022, requesting that DWER waive the licence fee during non-disposal years. DWER responded on 1 June 2022, advising that:

- the licence renewal fee paid in January 2022 will not be refunded due to the significant reassessment and review required by DWER as part of the renewal;
- the licence fee for the next annual licence period (due 2023) will be waived if there is no disposal of waste at the IWDF during that fee period; and
- DWER will revisit an ongoing fee waiver in non-disposal years once they have completed their review of all fees and charges associated with the *Environmental Protection Act 1986*.

3.4 Reporting to Radiological Council of Western Australia (RCWA) (2020 – 2021 PCR)

LM reported that the 2020 – 2021 Performance and Compliance Report (PCR) is almost complete and would be submitted to RCWA as soon as the final is approved.

Action: Finance to provide RCWA a copy of the 2020 – 2021 PCR when finalised.

3.5 RCWA Feedback on Publicly Available Waste Inventory Database Spreadsheet

An example of the publicly available spreadsheet to be published on the IWDF webpage on WA.gov.au was provided to the RCWA for their feedback.

RCWA accepted the content of the publicly available spreadsheet with the following changes:

Remove the fields:

- Original waste owner
- Location in disposal cell
- Depth to waste – although this information is readily available elsewhere

Include the fields:

- Conditioning of waste
- Package type
- Package dimensions.

RCWA would prefer to further reduce the scope of information included in the public spreadsheet, citing modern day security concerns including the current world political environment, particularly regarding the inclusion of locational information.

RCWA acknowledged that the requirement to have a publicly available waste database was a condition imposed by the EPA, therefore the decision did not rest with the RCWA.

3.6 Legal Deposit

As reported at the last MRM, IWDF Progress and Compliance Reports (PCRs) (post 2008), Handbooks (all versions) and brochure (all versions) are required to be provided to the State Library to comply with the *Legal Deposit Act 2012*. Submission of documents to the State Library has not occurred since 2008. After discussion with the State Library, it was agreed that the backlog of documents would be provided to the State Library when the 2020 – 2021 PCR was finalised.

This action has been postponed by the delay in the completion of the 2020 – 2021 PCR.

Action: LM to provide all appropriate copies of IWDF documents to the State Library when the 2020 – 2021 PCR is complete.

3.7 Finance IWDF Website Content

The IWDF Handbook and 2-page brochure are available on the IWDF webpage on WA.gov.au.

The IWDF Handbook was updated in May 2022 to include the new proponent in Section 2 and the new version (Version 17) will be uploaded to the website as soon as a review of the document is complete.

No changes have been made to the 2-page brochure.

4. IWDF Management Systems

LM reported that all the document control matrices and registers have been reviewed and updated, where required, just prior to the MRM.

4.1 Environmental, Health & Safety and Quality Policy Review

The Environmental, Health & Safety and Quality Policy will not be reviewed for suitability until the December 2022 MRM in line with the required review period.

4.2 IWDF Management Plans

LM reported that a review of the Management Plans was undertaken in May 2022. A summary of the changes made is provided in the table below.

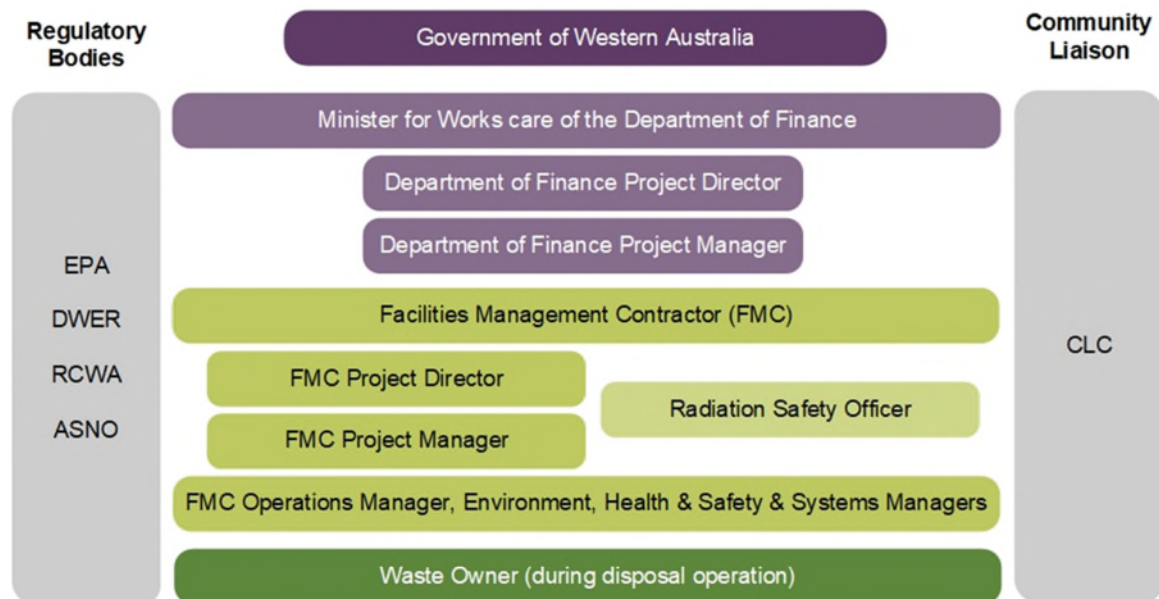
Management Plan	Version	Review Date	Change
1 Air Quality	V25	12/05/22	Update to version of AS/NZS 3580.9.13
2a Decommissioning and Rehabilitation - A	V25	12/05/22	Update to include final cover approval from RCWA
2b Decommissioning and Rehabilitation - B	V25	12/05/22	Update to include final cover approval from RCWA
5 Health and Safety	V24	07/02/22	Update to include a requirement for fire extinguisher replacement every five years.

4.3 Management Manuals

The Finance management manual was reviewed by the Management Team.

The Finance manual has been updated to include detail about the change of proponent to the Minister for Works C/- Department of Finance.

The Governance Structure figure below is included in the Draft 2021 - 2022 PCR. An error was made in the previous MRM minutes as the figure below was not included in the 2020 – 2021 PCR as the Minister for Works was not the proponent on Ministerial Statement 562 at the time.



Acronyms

- EPA: Environmental Protection Agency
- DWER: Department of Water and Environmental Regulation
- RCWA: Radiological Council of Western Australia
- ASNO: Australian Safeguards and Non-proliferation Office
- CLC: Community Liaison Committee

4.4 Registers

LM reported that the Aspects and Impacts and Legislative and Other Requirements Registers had been reviewed in November 2021. Review is not scheduled to occur again until November 2022.

4.5 Finance EHSMS and Procedures

All Finance procedures were reviewed and, where applicable, updated in November 2021. Review is not scheduled to occur again until November 2022.

MP-12 Management Review was updated in May 2022 to include the requirement for all system documents to be uploaded to Finance prior to each MRM.

4.6 FMC EHSMS & FMC Procedures

FMC procedures were reviewed and updated, as required, during November 2021. Review is not scheduled to occur again until November 2022.

4.7 Performance and Compliance Reporting (PCR)

The draft 2020 - 2021 PCR is almost complete and is undergoing final formatting.

Work has commenced on the draft 2021 – 2022 PCR.

4.8 Annual Review of Finance R&D Schedule

SN confirmed she had reviewed Finance's Retention and Disposal Schedule and found it satisfactory.

The Finance records management team have advised that the schedule was updated in 2020 and is not due for review until 2025.

LM reported that she had sent some suggested changes to the previous IWDF Project Director.

Action: LM to send suggested changes to the current IWDF Project Director and Contract Manager.

5. Action Plans

5.1 2021 – 2022 Action Plans

LM reported that to date performance against the 2021 – 2022 Action Plans was good. The incomplete actions were all waiting on external input but were progressing well.

The outstanding actions are provided in the table below.

Action Plan	Improvement Target	Action	Responsibility	Required Completion Date	Status
6 Radiation	Completed procedure for providing public access.	Draft a detailed procedure for allowing public access to the waste registers (chemical & radioactive)	Finance Project Manager	December 2021	Waiting on final review of production database
6 Radiation	Safety Assessment/Case	Update the Operation Safety Assessment and Safety Case with changes as requested by ARPANSA and agreed by RCWA	RSO	June 2022	Work is ongoing
11 Review of Management	Amended DWER Licence	Prepare DWER Licence renewal with a request to change Condition 2 from 3 months to 28 working days	FMC Project Manager	Renewal application was submitted to DWER 16 Nov 2021	Waiting on conditions to be set by DWER before assessing if change is required on new licence.

5.2 2022 – 2023 Action Plans

It was agreed that the outstanding actions from the 2021 - 2022 Action Plans would be moved to the 2022 - 2023 Action Plans.

6. Compliance Audits Internal and External

6.1 Ministerial Statement

A six-monthly compliance audit against Ministerial Statement 562 was completed. **One** non-compliance was recorded.

The proponent is non-compliant with Commitment 8 which requires the proponent to convene a minimum of four CLC meetings a year.

6.2 Licences, Permits and Registrations

Auditing for the 2021 – 2022 reporting period is not yet complete.

6.3 Finance Management System

Auditing for the 2021 – 2022 reporting period is not yet complete.

6.4 FMC Management System

Auditing for the 2021 – 2022 reporting period is not yet complete.

6.5 Management Plans

Auditing for the 2021 – 2022 reporting period is not yet complete.

6.6 Ongoing Suitability of Management Plans

Given the ongoing review undertaken over the past six months and the subsequent applicable changes made to the various system documents it was concluded by the IWDF Management Team that the management plans and other system documents continue to be fit for purpose.

6.7 Liaison with National and International Intractable Waste Management Facilities

LM reported that the websites for similar facilities were reviewed regularly to ensure that any changes to the operational processes for these facilities is considered against the current operation processes for the IWDF and, where appropriate, changes were made to the procedures for the IWDF to ensure continual improvement and best practice.

7. Non-conformance and Corrective Action Requests

There is one Corrective Action Requests (CARs) from the recent audit of Ministerial Statement 562. The CAR was related to the number of CLC meetings held during the audit period.

8. Electronic Document Library

LM reported that the Electronic Document Library had been updated to include the following document:

Commission for Occupational Safety and Health, (2022) *Excavation: Code of practice*, State of Western Australia, Department of Mines, Industry Regulation and Safety 89pp.

9. Guidelines – Updates and Changes

The following guidelines were reviewed in May 2022, but no changes were required:

- Chemical Guidelines – waste acceptance proforma has been converted to a PDF fillable form (Revision 15, March 2021).
- Radioactive Guidelines – waste acceptance proforma has been converted to a PDF fillable form (Revision 18, December 2021).

10. Monitoring

10.1 Groundwater Monitoring

Groundwater monitoring for April 2022 has been completed and no groundwater has been detected in any of the monitoring bores. Next groundwater monitoring is scheduled for October 2022.

10.2 Capping Monitoring

Capping monitoring was last completed in October 2021 with no capping issues reported. Next capping monitoring is scheduled for October 2022.

10.3 Rehabilitation Monitoring (Annual)

Rehabilitation monitoring was last completed October 2021. It should be noted that the October 2021 rehabilitation monitoring did not include the disposal cells established prior to 2000 as the rehabilitation for these cells has been assessed by a botanist and deemed complete. Next rehabilitation monitoring is scheduled for October 2022.

10.4 Dose Constraint Monitoring (RSO)

Thermo-Luminescent Dosimeter (TLD) badges have been issued to MS with one control placed at the site office to monitor whole body dose exposures during site monitoring activities. This monitoring encompasses 4 separate site visits to undertake surveillance and monitoring of the site. Dose exposure data is available for the April 2021 to March 2022 period.

Results returned a dose exposure that was below the Minimum Detection Level (MDL) of 0.01 mSv for each quarter. The total accumulated dose for the year was 0.02 mSv. A public dose constraint has been set for the IWDF of 0.3 mSv/year in line with International Atomic Energy Agency (IAEA) and Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) guidance. Dose exposures were well below the dose constraint.

10.5 5-yearly Radiation Monitoring Planning (RSO)

A proposal is required to estimate costs for undertaking the 5-yearly gamma survey at the same discrete GPS locations. This will be undertaken during the next scheduled site

monitoring visit over a 2-day period in October 2022. A report will be issued to the RCWA for information in November.

11. IWDF Infrastructure

11.1 Access Road - Current Management Status Report

The Access Road continues to be well managed under the road use agreement with Tellus Holdings Ltd. Yilgarn Iron Pty Ltd, a wholly owned subsidiary of Mineral Resources Ltd (MRL), continue iron ore haulage operations on the Access Road in accordance with their road use permit.

MRL is working with Main Roads to upgrade the intersection of Great Eastern Highway and the IWDF Access Road. The works will include widening of the intersection and construction of an Auxiliary Left turning treatment. MRL have advised that works are expected to commence in late July 2022.

11.2 Access Road - Current Condition Report

MS reported that the Access Road, as assessed in October 2021, was in good condition.

11.3 Disposal of Replaced Genset

Finance made enquiries to two auction houses in April 2022 regarding auction of the old 1996 Allight genset from the IWDF. A decision was made to auction the genset at Ross's Auctioneers & Valuers in Kalgoorlie as they offered better value for money. Finance is currently in the process of seeking clarifications on the auction terms and conditions but has yet to receive a response from Ross's.

12. Staff Training

There were no new personnel from either the FMC or Finance over the past six months therefore no training was required.

There was discussion about the requirements of the new *Work Health and Safety Act 2020* and the potential effect on the frequency of site inductions for the IWDF. This discussion occurred as it was recognised that the RSO would be required to visit the IWDF in October 2022 to undertake the 5-yearly monitoring and it would be 5 years since the RSO had completed a site induction and undertaken a site visit to the IWDF. Given the timeframe between the site induction and visits to the IWDF it was thought that review of the induction process was required.

It was agreed to introduce a formal timeframe after which IWDF site induction training is required to be retaken. This would require changes to various system documents, training registers, skill matrices etc.

13. Radioactive Issues

13.1 IWDF Safety Assessment and Safety Case

There are three separate deliverables in production:

- Post-Closure Safety Assessment (PCSA) based on agreed postulated external accident events during the Institutional Control Period (ICP) and agreed future limits on radioactive inventories for disposal (based on database records).
- Operations Safety Assessment (OSA) based on previous draft OSA and incorporating requirements of RPSC-3 Disposal Code and ARPANSA recommendations (this part applies to PCSA too).
- Facility Safety Case (FSC) which will refer to OSA, PCSA, supporting deterministic and probabilistic assessments and historical safety assessments for siting, design and construction of the IWDF.

14. Community Liaison Committee

14.1 Meeting Dates and Issues Raised by CLC During Meetings Held Since June 2021

CLC meetings were held on 14 October 2021 and 1 April 2022. The next meeting is scheduled for 30 June 2022.

At the 14 October 2021 CLC meeting the CLC agreed to convene a minimum of three meetings a year instead of four.

The CLC have requested a visit to the IWDF however this has been put on hold due to COVID restrictions.

14.2 Meeting Frequency

Finance met with EPA Services to discuss the reduction of CLC meetings from a minimum of four meetings to a minimum of three meetings per year. EPA Services advised that a formal request for amendment would need to be submitted to the EPA for assessment.

Due to the significant cost associated with a formal request, Finance are currently reviewing the options with its senior management.

15. FMC Performance

15.1 Performance Against FMC 2021 - 2022 Estimated Costs

MS reported that performance against the 2021-2022 FMC cost estimate was on track.

15.2 FMC Performance Against Finance Contract Management Plan

EH reported that performance against the Action Plan and Task Calendar was good and several items involving RCWA had now been closed out which was a great outcome.

At the December 2021 MRM, SN noted that the completion of action items from the Ongoing Environmental and Operational Meetings (OEOM) could be timelier. Since SN began to send out monthly action reminders, completion of action items has improved considerably.

16 Other Business

16.1 Disposal Applications

No new applications have been received to date, but two waste owners have resubmitted the Radioactive Waste Acceptance Proforma (WAP) at Rev 18, in line with recommendations received from RCWA, for their consideration. The safety assessment previously provided to the Radiation Health Unit (RHU) for these two waste owners will still apply, but all future assessments will be judged against the new OSA and FSC as to their acceptability for disposal. The status of waste enquiries and applications is provided below.

Stage of progress	Radioactive	Chemical
Approved applications	21 (partial)	0
Applications under assessment	0	0
Applications awaiting assessment	0	0
Waste enquiries in progress	0	0

Partial – some radioactive wastes declared for disposal will require further justification and resubmission to RCWA.

16.2 Frequency of Review of Current Disposal Practices and Awareness of International Best Practices and Advances in Technology

During review of the draft 2020 - 2021 Performance and Compliance Report, EH asked whether review of current disposal practices and awareness of international best practices and advances in technology could be conducted annually rather than biannually. LM explained that in practice, she conducts her review on an ongoing basis as new information arises as this method is more efficient. There were no issues with this practice being continued.

17 Next Meeting

To be scheduled for December 2022.

APPENDIX R
2021 – 2022 Action Plans



2021– 2022 ACTION PLANS

Department of Finance (Finance) Action Plans detail specific improvement objectives for the continual improvement of the IWDF's management, and set quantitative targets, timeframes, and personnel for achieving these objectives.

The Action Plans are working documents and through regular review new improvement objectives are established as others are achieved. The Action Plans are linked closely to the Management Plans, which provide detail on the management goals and targets and provide a basis for the identification of improvement objectives. Further details on objectives and targets and the development of Action Plans are detailed in MP-03 Objectives and Targets and MP-04 Environmental, Health and Safety Management Program.

ENVIRONMENTAL ACTION PLAN 1 - AIR QUALITY					
Environmental, Health and Safety, and Quality Policy Statement: Take all practical steps to minimise the impact of the site & operational activities on the environment, and the community, and ensure the protection of the health and safety of the public and the IWDF personnel by appropriate training of all personnel.					
Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records
Improvement Objective:					
N/A					
ENVIRONMENTAL ACTION PLAN 2 - REHABILITATION AND DECOMMISSIONING					
Environmental, Health and Safety, and Quality Policy Statement: Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health & environmental protection by ensuring the adequacy of the EHSQMS, the policy and operational activities at the IWDF, through a process of <u>continual</u> review.					
Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records / status update
Improvement Objective: Re-establish removed and disturbed habitats to their original level of species diversity and land use					
Agreed approach for Final Cover for Waste Disposal Cells at the IWDF (Clayvault WA, May 2014)	Seek approval from Radiological Council for proposed approach	FMC Project Manager	sent to RC (Duncan) July 2015 & Nov 2019 with a request for their comment and/or approval. Resent 3 Dec 2020,	17 Feb 2022	Written approval 17 Feb 2022

ENVIRONMENTAL ACTION PLAN 3 - EMERGENCY RESPONSE

Environmental, Health and Safety, and Quality Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EHSQMS, the policy, and operational activities at the IWDF, through a process of continual review. Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required completion Date</i>	<i>Actual Completion Date</i>	<i>Records/Status Update</i>
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Improvement Objective:

N/A

ENVIRONMENTAL ACTION PLAN 4 - FLORA AND FAUNA

Environmental, Health and Safety, and Quality Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EHSQMS, the policy and operational activities at the IWDF, through a process of continual review.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required Completion Date</i>	<i>Actual Completion Date</i>	<i>Records/Status Update</i>
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Improvement Objective:

Re-establish removed and disturbed indigenous habitats to their original level of species diversity; Prevent introduction of non-indigenous species; Prevent the removal or priority flora species

ENVIRONMENTAL ACTION PLAN 5 - HEALTH AND SAFETY

Environmental, Health and Safety, and Quality Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EHSQMS, the policy and operational activities at the IWDF, through a process of continual review. Take all practical steps to minimise the impact of the site and operational activities on the environment and the community and ensure the protection of the health and safety of the public and the IWDF personnel by appropriately training all personnel involved in the IWDF operations.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required completion Date</i>	<i>Actual Completion Date</i>	<i>Records/Status Update</i>
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Improvement Objective: To confirm the ongoing adequacy of the IWDF EHSQMS by a process of continual review safe workplace and implement programs and strategies that ensure legislative compliance.

ENVIRONMENTAL ACTION PLAN 6 - RADIATION

Environmental, Health and Safety, and Quality Policy Statement:

Use recognised current best practices for near surface disposal of hazardous and low-level radioactive wastes and to remain aware of international advances in technology.

Improvement Target	Action	Responsibility	Required Completion Date	Actual Completion Date	Records/Status Update
Improvement Objective: to ensure public database is accurate & publicly available.					
Completed procedure for providing public access.	Draft a detailed procedure for allowing public access to the waste registers (chemical & radioactive).	Finance Project Manager	Dec 2021		the production database still requires final review by FMC & RSO.
Finalised Database	Meet with the Radiation Health to discuss the remaining discrepancies between the Radiation Health Database and the IWDF records.	RSO & IWDF Project Manager	Dec 2021	17-19 Nov 21	Proposed outcome items 1 & 3 were actioned during the scheduled meeting.
Improvement Objective: To ensure IWDF activities comply with the code of practice for near surface disposal of radioactive waste in Australia. (1992) and with the Code for Disposal Facilities for Solid Radioactive Waste (released October 2018).					
Safety Assessment / Case	Update the Operation Safety Assessment and Safety Case with changes as requested by ARPANSA and agreed by RCWA.	RSO	June 2022		RCWA agreed that the proposed content for the safety case is in line with requirements of RPS C-3. RSO is now progressing this work
Long-term custodianship of the IWDF waste inventory database	Discuss the matter of long-term custodianship of the IWDF waste inventory database with RCWA.	Finance Project Director	June 2022	16 Dec 2021	discussed at workshop with RCWA – Finance to retain custodianship

ENVIRONMENTAL ACTION PLAN 7- TRANSPORT

Environmental, Health and Safety, and Quality Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health, and environmental protection by ensuring the adequacy of the EHSQMS, the environmental policy and operational activities at the IWDF, through a process of continual review.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required Completion Date</i>	<i>Actual Completion Date</i>	<i>Records</i>
Improvement Objective:					
N/A					

ENVIRONMENTAL ACTION PLAN 8 – WATER

Environmental, Health and Safety, and Quality Policy Statement:

Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health and environmental protection by ensuring the adequacy of the EHSQMS, the policy and operational activities at the IWDF through a process of continual review.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required Completion Date</i>	<i>Actual Completion Date</i>	<i>Records</i>
Improvement Objective:					
N/A					

ENVIRONMENTAL ACTION PLAN 9 – WASTE ACCEPTANCE

Environmental, Health and Safety, and Quality Policy Statement:

Maintain strict adherence to the ‘waste hierarchy’ by ensuring no practically available reuse, recycling, treatment, destruction or alternative disposal options in Australia for all wastes accepted for disposal at the IWDF.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required Completion Date</i>	<i>Actual Completion Date</i>	<i>Records</i>
Improvement Objective: To ensure that there are no inadvertent barriers to appropriate waste being disposed at the IWDF					
N/A					

ENVIRONMENTAL ACTION PLAN 10 – COMMUNITY LIAISON

Environmental, Health and Safety, and Quality Policy Statement:

Liaise directly with the community on all operational activities & outcomes & ensure that all disposal details & monitoring /auditing records are both publicly available & securely stored for future reference.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required Completion Date</i>	<i>Actual Completion Date</i>	<i>Records</i>
Improvement Objective: To ensure that information about the IWDF is readily available to the community & the community has every opportunity to learn of IWDF operations					
Improvement Objective: to ensure that the proponent continue to meet the requirements of proponent commitment 7.3.					

ENVIRONMENTAL ACTION PLAN 11 - REVIEW OF MANAGEMENT

Environmental, Health and Safety, and Quality Policy Statement:

Use recognised current best practices for near surface disposal of intractable & low-level radioactive wastes & to remain aware of international advances in technology. Meet or exceed statutory requirements for all IWDF activities including transport, safety, public health & environmental protection by ensuring the adequacy of the EHSQMS, the policy & operational activities at the IWDF, through a process of continual review.

<i>Improvement Target</i>	<i>Action</i>	<i>Responsibility</i>	<i>Required Completion Date</i>	<i>Actual Completion Date</i>	<i>Records/Status update</i>
Improvement Objective: To ensure that the Management Order, Licensing and Registrations and all system procedures are up to date.					
Amended DWER Licence	Prepare DWER Licence renewal with a request to change Condition 2 from 3 months to 28 working days	FMC Project Manager	Renewal application submitted to DWER 16 Nov 2021		Still waiting on conditions to be set

Revision	Date	Description	Prepared by:	Checked by:	Approved by:
0.1	03/06/21	Draft – for review at Management Review Meeting	LM	MT	MT
0.2	13/07/21	Final – as agreed at June 2021 MRM	LM	MT	MT

0.3	07/09/21	No changes	LM	MT	MT
0.4	03/10/21	Updated Action plans 2 & 6	LM	MT	MT
0.5	02/11/21	Updated Action plans 6 & 11	LM		
0.6	15/12/21	Update to plans 6 and 11	LM		
0.7	15/02/22	Update to plans 2,6, and 11	LM		
0.8	10/03/22 12/04/22	Update to plans 2,6, and 11 Review only – no changes required	LM		
0.9	10/05/22	Update to “Environmental, Health and Safety, and Quality Policy Statement” to include “Quality”	LM		

APPENDIX S

2021 – 2022 FMC Document Control Matrix and Finance Document Control Matrix

**DOCUMENT CONTROL MATRIX
FINANCE-MF-06-2**

DOCUMENT DESCRIPTION	EXAMPLE	DOCUMENT PREPARER	DOCUMENT REVIEWER	DOCUMENT APPROVER	DOCUMENT CONTROLLER	DOCUMENT LOCATION
Contracts	Joint Cost Sharing Agreement	Finance IWDF Project Manager	Finance IWDF Project Director	Finance IWDF Project Director	Finance IWDF Project Manager	Finance Records Management System Files
Environmental & Health and Safety Management program and Systems	Guidelines, procedures, management manuals, safety assessment, safety case etc.	FMC Project Manager. FMC project Director, RSO	<i>FMC Project Manager</i> <i>FMC Project Director</i>	EPA & RCWA (as required) FMC Project Director	FMC Project Manager	Management System folder on both Finance & FMC servers
Project Correspondence	Letters, emails,	Finance IWDF Project Manager	Finance IWDF Project Director	IWDF Project Manager or Director	IWDF Project Manager	Finance files Copies – FMC files
Reports	Close out Report, PCR etc.	FMC Project Manager	Finance IWDF Project Manager	IWDF Management Team	FMC Project Manager	Document Library
Quotes and Requests for tender	IWDF site management consultancies	Finance Project Manager Consultants	Finance Project Manager	Finance Project Manager or Director	Finance Project Manager	Finance Records Management System files
Ministerial Documents	Ministerial briefings	Finance IWDF Project Manager FMC Project Manager	Finance Project Manager or Director	Finance Project Manager or Director	Finance Project Manager	Finance Records Management System files
Other Quality Critical correspondence	Non project letters, emails etc.	Finance IWDF Project Manager	Finance Project Manager	Finance Project Manager or Director	Finance Project Manager	Finance Records Management System files

DOCUMENT DESCRIPTION	EXAMPLE	DOCUMENT PREPARER	DOCUMENT REVIEWER	DOCUMENT APPROVER	DOCUMENT CONTROLLER	DOCUMENT LOCATION
Test and Monitoring Results	Monitoring results	FMC Project Manager FMC Environmental Manager, RSO	FMC Project Manager	FMC Project Director	FMC Project Manager	Finance Records Management System files
Key Studies and Reports	Fauna or vegetation and flora surveys,	FMC Project Manager FMC Project Director FMC Environmental Manager, RSO, specialist consultants	FMC Project Manager, or Director	FMC Project Manager, or Director	FMC Project Manager	Finance Records Management System files
Figures/ drawings /designs	Location map, trench design etc.	Consultants FMC Project Manager	FMC Project Manager	FMC Project Manager	FMC Project Manager	Document Library
Referrals to regulatory authorities for project or waste disposal approval	Letter to EPA, Radiological Council	FMC Project Manager FMC Project Director	Finance IWDF Project Manager	Finance IWDF Project Manager	Finance IWDF Project Manager FMC Project Manager	Finance Records Management System files, Document Library
Legislative documents (as specified in Legal registers)	<i>Environmental Protection Act 1986</i>	N/A	N/A	N/A	FMC Project Manager	Document Library

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

DOCUMENT CONTROL MATRIX

DOCUMENT TYPE	DOCUMENT	DOCUMENT PREPARER	DOCUMENT REVIEWER	DOCUMENT APPROVER	DOCUMENT CONTROLLER (local/draft controller)	DOCUMENT DISTRIBUTION	MASTER DOCUMENT LOCATION/ FILE
FMC CONTROLLED DOCUMENTS							
Environmental Management System – FMC Procedures	Management Manual	Systems Manager	FMC Project Manager	FMC IWDF Project Director	FMC Systems Manager	FINANCE, FMC, RSO, Earth works contractor	FMC
	Operational Procedures (& instructions)	Operations Manager, Systems Manager	FMC Project Manager	FMC IWDF Project Director	FMC Systems Manager	FINANCE, FMC, RSO, Earth works contractor	FMC
	Environmental Procedures (& instructions)	Environmental Manager, Systems Manager	FMC Project Manager	FMC IWDF Project Director	FMC Systems Manager	FINANCE, FMC, RSO, Earth works contractor	FMC
	Radiation Procedures (& instructions)	Radiation Safety Officer, Systems Manager	FMC Project Manager	FMC IWDF Project Director	Systems Manager	FINANCE, FMC, RSO, Earth works contractor	FMC
	Safety Procedures (& instructions)	Safety Manager, Systems Manager	FMC Project Manager	FMC IWDF Project Director	Systems Manager	FINANCE, FMC, RSO, Earth works contractor	FMC
	FMC Management Procedures	Systems Manager	FMC Project Manager	FMC IWDF Project Director	Systems Manager	FINANCE, FMC, RSO, Earth works contractor	FMC
RSO CONTROLLED DOCUMENTS							
Safety Assessment	Operations safety assessment	RSO, Radiation Manager	FINANCE, FMC	Radiological Council	FMC Systems Manager	FINANCE, FMC, RSO, Radiological Council	FMC
	Post Closure safety assessment	RSO, Radiation Manager	FINANCE, FMC	Radiological Council	FMC Systems Manager	FINANCE, FMC, RSO, Radiological Council	FMC
Safety Case	Facility safety case	RSO, Radiation Manager	FINANCE, FMC	Radiological Council	FMC Systems Manager	FINANCE, FMC, RSO, Radiological Council	FMC

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

DOCUMENT TYPE	DOCUMENT	DOCUMENT PREPARER	DOCUMENT REVIEWER	DOCUMENT APPROVER	DOCUMENT CONTROLLER (local/draft controller)	DOCUMENT DISTRIBUTION	MASTER DOCUMENT LOCATION/ FILE
FINANCE CONTROLLED DOCUMENTS							
Guidelines	Environmental (Reporting) Guidelines	Systems Manager, Environmental Manager	FMC Project Manager	FMC IWDF Project Director	FINANCE & FMC Systems Manager	FINANCE FMC	FMC
	Waste Acceptance Guidelines – Chemical and Radioactive	Systems Manager, Operations Manager	FMC Project Manager	FMC IWDF Project Director	FINANCE & FMC Systems Manager	FINANCE FMC	FMC
	Transport Guidelines	Systems Manager, Transport Coordinator, Operations Manager	FMC Project Manager	FMC IWDF Project Director	FINANCE & FMC Systems Manager	FINANCE FMC	FMC
	Transport (Reporting) Guidelines	Systems Manager, Transport Coordinator, Operations Manager	FMC Project Manager	FMC IWDF Project Director	FINANCE & FMC Systems Manager	FINANCE FMC	FMC
	Health & Safety and Emergency Response (Reporting) Guidelines	Systems Manager, Health & Safety Manager	FMC Project Manager	FINANCE IWDF Project Manager	FINANCE & FMC Systems Manager	FINANCE FMC	FMC
Disposal Operation Procedures	Operation Environmental & Waste Acceptance Procedures (OEWPP)	Systems Manager, Environmental Manager, Operations Manager	FMC Project Manager	FINANCE IWDF Project Manager	FINANCE & Systems Manager	FINANCE FMC EPA Radiological Council	FMC
	Operation Transport Procedures (OTP)	Systems Manager, Transport Coordinator,	FMC Project Manager	FINANCE IWDF Project Manager and EPA	FINANCE & Systems Manager	FINANCE FMC DMP	FMC

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

DOCUMENT TYPE	DOCUMENT	DOCUMENT PREPARER	DOCUMENT REVIEWER	DOCUMENT APPROVER	DOCUMENT CONTROLLER (local/draft controller)	DOCUMENT DISTRIBUTION	MASTER DOCUMENT LOCATION/ FILE
		Operations Manager					
	Operation Health & Safety and Emergency Response Procedures (OHS&ERP)	Systems Manager, Health & Safety Manager	FMC Project Manager	FINANCE IWDF Project Manager and EPA	FMC Systems Manager	FINANCE FMC EPA Radiological Council	FMC
	Construction Specifications	Systems Manager, Engineering Manager	FMC Project Manager	FINANCE IWDF Project Manager and EPA	FMC Systems Manager	FINANCE FMC EPA Radiological Council	FMC
Compliance Reports	Annual Performance and Compliance report	Systems Manager, Operations Manager	FMC Project Manager	IWDF Management Team, EPA & Radiological Council	FMC Systems Manager	FINANCE FMC EPA Radiological Council CLC DWER	FMC
General Information about IWDF	Information Handbook	Systems Manager, Operations Manager	FMC Project Manager / Director	IWDF Management Team	FMC Systems Manager	General public	FMC
	Information brochure (2 page)	Systems Manager, Operations Manager	FMC Project Manager / Director	IWDF Management Team	FMC Systems Manager	General public	FMC
EXTERNAL DOCUMENTS							
All external documents are in the e-document library located on the FMC IWDF Project folder.							

APPENDIX T

2021 – 2022 Access Road Condition Reports

IWDF MT WALTON EAST ACCESS ROAD ODOMETER START 13568
 CONDITION REPORT ODOMETER FINISH 13666

DATE 11/10/2021
 DRIVER MJS

IWDF-FORM-44

KEY:	Trafficable	T		kms		kms	circle one	NOTES*	
	Soft - L Vehicles Only	S		railway	46	54	clay	Ⓣ S U	
	Un-trafficable	U			47	53	sand	Ⓣ S U	
					48	52	sand	Ⓣ S U	
				wash	49	51	gravel	Ⓣ S U	
highway		circle one	NOTES*		50	50	sand	Ⓣ S U	
	0	100 sand	Ⓣ S U		51	49	sand	Ⓣ S U	
	1	99 sand	Ⓣ S U		52	48	sand	Ⓣ S U	
	2	98 sand	Ⓣ S U		53	47	sand	Ⓣ S U	
	3	97 sand	Ⓣ S U	WIDE + FLAT	54	46	sand	Ⓣ S U	
	4	96 sand	Ⓣ S U		55	45	sand	Ⓣ S U	
powerline	5	95 sand	Ⓣ S U		56	44	sand	Ⓣ S U	
	6	94 sand	Ⓣ S U	EXCELLENT SURFACE	57	43	sand	Ⓣ S U	
	7	93 sand	Ⓣ S U		58	42	sand	Ⓣ S U	
	8	92 clay	Ⓣ S U		59	41	sand	Ⓣ S U	
	9	91 s + gr	Ⓣ S U	SOME WORRY ABOUT THE SHAPE - PERHAPS TOO FLAT	60	40	clay	Ⓣ S U	
	10	90 s + gr	Ⓣ S U		floodway	61	39	clay	Ⓣ S U
x-road	11	89 sand	Ⓣ S U		floodway	62	38	clay	Ⓣ S U
	12	88 sand	Ⓣ S U			63	37	sand	Ⓣ S U
wash	13	87 gravel	Ⓣ S U			64	36	sand	Ⓣ S U
wash	14	86 sand	Ⓣ S U			65	35	sand	Ⓣ S U
	15	85 sand	Ⓣ S U			66	34	sand	Ⓣ S U
	16	84 sand	Ⓣ S U		wash	67	33	sand	Ⓣ S U
	17	83 sand	Ⓣ S U			68	32	sand	Ⓣ S U
wash (2)	18	82 sand	Ⓣ S U			69	31	sand	Ⓣ S U
	19	81 sand	Ⓣ S U		wash	70	30	sand	Ⓣ S U
	20	80 sand	Ⓣ S U			71	29	sand	Ⓣ S U
	21	79 sand	Ⓣ S U		floodway	72	28	clay	Ⓣ S U
floodway	22	78 sand	Ⓣ S U			73	27	clay	Ⓣ S U
	23	77 sand	Ⓣ S U			74	26	clay	Ⓣ S U
	24	76 sand	Ⓣ S U		wash	75	25	s + gr	Ⓣ S U
	25	75 sand	Ⓣ S U			76	24	s + gr	Ⓣ S U
wash	26	74 s + gr	Ⓣ S U			77	23	clay	Ⓣ S U
	27	73 sand	Ⓣ S U		wash	78	22	gravel	Ⓣ S U
	28	72 sand	Ⓣ S U			79	21	clay	Ⓣ S U
	29	71 sand	Ⓣ S U			80	20	s + gr	Ⓣ S U
	30	70 sand	Ⓣ S U			81	19	s + gr	Ⓣ S U
	31	69 sand	Ⓣ S U			82	18	s + gr	Ⓣ S U
wash	32	68 sand	Ⓣ S U			83	17	s + gr	Ⓣ S U
	33	67 sand	Ⓣ S U			84	16	s + gr	Ⓣ S U
	34	66 sand	Ⓣ S U			85	15	s + gr	Ⓣ S U
	35	65 sand	Ⓣ S U			86	14	s + gr	Ⓣ S U
	36	64 clay	Ⓣ S U			87	13	s + gr	Ⓣ S U
wash	37	63 sand	Ⓣ S U			88	12	s + gr	Ⓣ S U
	38	62 sand	Ⓣ S U			89	11	s + gr	Ⓣ S U
	39	61 sand	Ⓣ S U			90	10	s + gr	Ⓣ S U
	40	60 sand	Ⓣ S U		wash	91	9	gravel	Ⓣ S U
	41	59 sand	Ⓣ S U			92	8	clay	Ⓣ S U
	42	58 sand	Ⓣ S U		wash	93	7	clay	Ⓣ S U
wash	43	57 clay	Ⓣ S U			94	6	s + gr	Ⓣ S U
	44	56 clay	Ⓣ S U			95	5	sand	Ⓣ S U
wash	45	55 clay	Ⓣ S U			96	4	s + gr	Ⓣ S U
railway	46	54 clay	Ⓣ S U			97	3	s + gr	Ⓣ S U
	47	53 sand	Ⓣ S U			98	2	s + gr	Ⓣ S U
						99	1	IWDF	Ⓣ S U
*NOTES		Water depth, blockage of drains, etc			100	0	Camp	Ⓣ S U	

Mt Walton East

IWDF MT WALTON EAST ACCESS ROAD ODOMETER START 62321
 CONDITION REPORT

DATE 4/4/2022

ODOMETER FINISH 62419

DRIVER MJS

IWDF-FORM-44

KEY:		Trafficable	T		kms			circle	NOTES*
		Soft - L Vehicles Only	S		railway 46	54	clay	⊕ S U	
		Un-trafficable	U		47	53	sand	⊕ S U	
					48	52	sand	⊕ S U	
	kms	kms	circle one	NOTES*	wash 49	51	gravel	⊕ S U	
highway					50	50	sand	⊕ S U	
	0	100	sand	⊕ S U		51	49	sand	⊕ S U
	1	99	sand	⊕ S U		52	48	sand	⊕ S U
	2	98	sand	⊕ S U		53	47	sand	⊕ S U
	3	97	sand	⊕ S U		54	46	sand	⊕ S U
	4	96	sand	⊕ S U		55	45	sand	⊕ S U
powerline	5	95	sand	⊕ S U		56	44	sand	⊕ S U
	6	94	sand	⊕ S U		57	43	sand	⊕ S U
	7	93	sand	⊕ S U		58	42	sand	⊕ S U
	8	92	clay	⊕ S U		59	41	sand	⊕ S U
	9	91	s + gr	⊕ S U		60	40	clay	⊕ S U
	10	90	s + gr	⊕ S U	floodway 61	39	clay	⊕ S U	
x-road	11	89	sand	⊕ S U	floodway 62	38	clay	⊕ S U	
	12	88	sand	⊕ S U		63	37	sand	⊕ S U
wash	13	87	gravel	⊕ S U		64	36	sand	⊕ S U
wash	14	86	sand	⊕ S U		65	35	sand	⊕ S U
	15	85	sand	⊕ S U		66	34	sand	⊕ S U
	16	84	sand	⊕ S U		67	33	sand	⊕ S U
	17	83	sand	⊕ S U	wash 67	68	32	sand	⊕ S U
wash (2)	18	82	sand	⊕ S U		69	31	sand	⊕ S U
	19	81	sand	⊕ S U		70	30	sand	⊕ S U
	20	80	sand	⊕ S U		71	29	sand	⊕ S U
	21	79	sand	⊕ S U		72	28	clay	⊕ S U
floodway	22	78	sand	⊕ S U		73	27	clay	⊕ S U
	23	77	sand	⊕ S U		74	26	clay	⊕ S U
	24	76	sand	⊕ S U		75	25	s + gr	⊕ S U
	25	75	sand	⊕ S U		76	24	s + gr	⊕ S U
wash	26	74	s + gr	⊕ S U		77	23	clay	⊕ S U
	27	73	sand	⊕ S U		78	22	gravel	⊕ S U
	28	72	sand	⊕ S U		79	21	clay	⊕ S U
	29	71	sand	⊕ S U		80	20	s + gr	⊕ S U
	30	70	sand	⊕ S U		81	19	s + gr	⊕ S U
	31	69	sand	⊕ S U		82	18	s + gr	⊕ S U
wash	32	68	sand	⊕ S U		83	17	s + gr	⊕ S U
	33	67	sand	⊕ S U		84	16	s + gr	⊕ S U
	34	66	sand	⊕ S U		85	15	s + gr	⊕ S U
	35	65	sand	⊕ S U		86	14	s + gr	⊕ S U
	36	64	clay	⊕ S U		87	13	s + gr	⊕ S U
wash	37	63	sand	⊕ S U		88	12	s + gr	⊕ S U
	38	62	sand	⊕ S U		89	11	s + gr	⊕ S U
	39	61	sand	⊕ S U		90	10	s + gr	⊕ S U
	40	60	sand	⊕ S U		91	9	gravel	⊕ S U
	41	59	sand	⊕ S U	wash 91	92	8	clay	⊕ S U
	42	58	sand	⊕ S U		93	7	clay	⊕ S U
wash	43	57	clay	⊕ S U		94	6	s + gr	⊕ S U
	44	56	clay	⊕ S U		95	5	sand	⊕ S U
wash	45	55	clay	⊕ S U		96	4	s + gr	⊕ S U
railway	46	54	clay	⊕ S U		97	3	s + gr	⊕ S U
	47	53	sand	⊕ S U		98	2	s + gr	⊕ S U
						99	1	IWDF	⊕ S U
						100	0	Camp	⊕ S U

*NOTES Water depth, blockage of drains, etc

Mt Walton East

APPENDIX U

2021 – 2022 Groundwater Monitoring Reports

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA**

MONITORING REGISTER

IWDF-FORM-39

Date	Year	Monitoring Record Completed**	Locations monitored	Result	Analysis Required*
20 OCTOBER	2015	YES	GM 1-9	DRY	N/A
12 APRIL	2016	YES	GM 1-9	DRY	N/A
18 OCTOBER	2016	YES	GM 1-9	DRY	N/A
20 APRIL	2017	YES	GM 1-9	DRY	N/A
17 OCTOBER	2017	YES	GM 1-9	DRY	N/A
19 APRIL	2018	YES	GM 1-9	DRY	N/A
25 OCTOBER	2018	YES	GM 1-9	DRY	N/A
2 APRIL	2019	YES	GM 1-9	DRY	N/A
24 OCTOBER	2019	YES	GM 1-9	DRY	N/A
2 FEBRUARY	2020	YES	GM 1-9	DRY	N/A
9 APRIL	2020	YES	GM 1-9	DRY	N/A
30 OCTOBER	2020	YES	GM 1-9	DRY	N/A
31 MARCH	2021	YES	GM 1-9	DRY	N/A
13 OCTOBER	2021	YES	GM 1-9	DRY	N/A
5 APRIL	2022	YES	GM 1-9	DRY	N/A

* For groundwater monitoring - See IWDF Form 21 for up-to-date list of parameters to be analysed
 ** For groundwater monitoring - IWDF Form 03
 For capping monitoring - IWDF Form 38b
 For rehabilitation monitoring - IWDF Form 38a.

**INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR**

SAMPLING/GROUNDWATER MONITORING RECORD FORM IWDF-FORM-03b

Project No.: DFI2021-004-ANMO		Location of Retained Samples: <u>N/A</u>			Sampled By: <u>MJS/SP</u>			
Site Name: Intractable Waste Disposal Facility, Mt Walton East								
Location: IWDF								
Operation/Project: Monitoring	Date: <u>5/4/2022</u>	Sample Description and any Observations		Container Type	Preservation			
Sample/Bore No.	Groundwater depth (if applicable)	Sample* Depth	Sampling Date	Sampling Time*	CoC No.	Sample Destination	Disposal Date	Collection Procedure
GM1	<u>38.008</u>	<u>DRY</u>						<u>DRY</u>
GM2	<u>40.651</u>	<u>DRY</u>						<u>DRY</u>
GM3	<u>39.120</u>	<u>DRY</u>						<u>DRY</u>
GM4	<u>30.081</u>	<u>DRY</u>						<u>DRY</u>
GM5	<u>28.059</u>	<u>DRY</u>						<u>DRY</u>
GM6	<u>25.903</u>	<u>DRY</u>						<u>DRY</u>
GM7	<u>31.563</u>	<u>DRY</u>						<u>DRY</u>
GM8	<u>31.400</u>	<u>DRY</u>						<u>DRY</u>
GM9	<u>42.117</u>	<u>DRY</u>						<u>DRY</u>

GENERAL COMMENTS:

WATER PROBE TESTED YES SIGNED: MG Shepherd TO MG Shepherd BE OPE

Duplicate Sample Yes No (N/A) Field Blanks Yes No (N/A) Original to file. Copy to Finance Project Manager within 14 days.

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA**

MONITORING REGISTER

IWDF-FORM-39

Date	Year	Monitoring Record Completed**	Locations monitored	Result	Analysis Required*
20 OCTOBER	2015	YES	GM 1-9	DRY	N/A
12 APRIL	2016	YES	GM 1-9	DRY	N/A
18 OCTOBER	2016	YES	GM 1-9	DRY	N/A
20 APRIL	2017	YES	GM 1-9	DRY	N/A
17 OCTOBER	2017	YES	GM 1-9	DRY	N/A
19 APRIL	2018	YES	GM 1-9	DRY	N/A
25 OCTOBER	2018	YES	GM 1-9	DRY	N/A
2 APRIL	2019	YES	GM 1-9	DRY	N/A
24 OCTOBER	2019	YES	GM 1-9	DRY	N/A
2 FEBRUARY	2020	YES	GM 1-9	DRY	N/A
9 APRIL	2020	YES	GM 1-9	DRY	N/A
30 OCTOBER	2020	YES	GM 1-9	DRY	N/A
31 MARCH	2021	YES	GM 1-9	DRY	N/A
13 OCTOBER	2021	YES	GM 1-9	DRY	N/A

* For groundwater monitoring - See IWDF Form 21 for up-to-date list of parameters to be analysed
 ** For groundwater monitoring - IWDF Form 03
 For capping monitoring - IWDF Form 38b
 For rehabilitation monitoring - IWDF Form 38a.

INTRACTABLE WASTE DISPOSAL FACILITY
FACILITY MANAGEMENT CONTRACTOR

SAMPLING/GROUNDWATER MONITORING RECORD FORM IWDF-FORM-03b

Project No.: DF12021-004-ANMO		Location of Retained Samples: <u>N/A</u>		Sampled By: <u>MJS/SP</u>							
Site Name: Intractable Waste Disposal Facility, Mt Walton East		Operation/Project: Monitoring		Date: <u>13/10/2021</u>							
Location: IWDF											
Sample/Bore No.	Groundwater depth (if applicable)	Sample* Depth	Sampling Date	Sampling Time*	CoC No.	Sample Destination	Disposal Date	Collection Procedure	Sample Description and any Observations	Container Type	Preservation
GM1	37.995	DRY							DRY		
GM2	40.650	DRY							DRY		
GM3	39.115	DRY							DRY		
GM4	30.085	DRY							DRY		
GM5	28.060	DRY							DRY		
GM6	25.900	DRY							DRY		
GM7	31.560	DRY							DRY		
GM8	31.400	DRY							DRY		
GM9	42.125	DRY							DRY		

GENERAL COMMENTS:

WATER PROBE TESTED YES SIGNED: Mg Shepherd TO Mg Shepherd BE OPE

Duplicate Sample Yes No N/A Field Blanks Yes No N/A Original to file. Copy to Finance Project Manager within 14 days.

APPENDIX V

2021 – 2022 Internal Audit Schedule

**INTERNAL MANAGEMENT AUDIT SCHEDULE
FINANCE-MF-11-1**

X = audit of procedure scheduled

X = Audit of procedure completed

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2021 - 22											
	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
Ministerial Statement 562						X						X
DFI MANAGEMENT PROCEDURES												
MP-01 Aspects and Impacts										X		
MP-02 Applicable Laws, Regulations and other Requirements											X	
MP-03 Objectives and Targets										X		
MP-04 Environmental, Health and Safety Management Program											X	
MP-05 Communications and Public Relations										X		
MP-06 Document and Data Control											X	
MP-07 Management of Records										X		
MP-08 Operational Planning											X	
MP-09 Training										X		
MP-10 Procurement											X	

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2021 - 22											
	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
MP-11 Management Audits										X		
MP-12 Management Review										X		
MP-13 Control of Non conformances and Corrective and Preventative Action										X		
FMC MANAGEMENT PROCEDURES												
FMP 1 Document & Data Control										X		
FMP 2 Records Management										X		
FMP 3 Training & Competencies										X		
FMP 4 System Auditing & Compliance										X		
FMP 5 Control of System non-conformances										X		
FMP 6 Control & Maintenance of Equipment										X		
FMC OPERATIONAL PROCEDURES & INSTRUCTIONS												
OP1 Assessment of Applications for Disposal										X		
OP 2 Planning Documentation & Approval for Disposal										X		
OP 3 Excavation of Trench										X		
OP 4 Waste Preparation for Disposal										X		
OP 5 Waste Loading & Transport										X		
OP 6 Waste Delivery Acceptance & Disposal										X		
OP 7 Capping Rehabilitation & Demobilization										X		
OP 8 Operation Close-out										X		
OP 9 Ongoing & General Management of IWDF										X		

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2021 - 22											
	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
OP10 Operation Site Management									X			
OI 1 Waste Inspection									X			
FMC ENVIRONMENTAL PROCEDURES & INSTRUCTIONS												
EP 1 Vegetation Management									X			
EP 2 Fauna Management									X			
EP 3 Environmental Monitoring									X			
EP 4 Water Management									X			
EP 5 Rehabilitation Management									X			
EP 6 Air Quality & Dust Management									X			
EP 7 Site Waste Management									X			
EP 8 Fuel Oil & Hazardous Materials Management									X			
EP 9 Environmental Incident Reporting									X			
EI 1 Groundwater Monitoring									X			
EI 2 Soil & Dust Sampling									X			
EI 3 Capping Monitoring									X			
EI 4 Rehabilitation Monitoring									X			
RADIATION MANAGEMENT PROCEDURES & INSTRUCTIONS												
RP 1 Radiation Management											X	
RI 1 Gamma Radiation Monitoring											X	
RI 2 Occupational Radiation Monitoring											X	
SAFETY MANAGEMENT PROCEDURES & INSTRUCTIONS												
SP 1 Health & Safety Management & Planning										X		
SP 2 Operation Site Safety Management										X		
SI 1 Excavation Safety										X		
SI 2 Personal protective Equipment										X		

PROCEDURE TO BE AUDITED	FINANCIAL YEAR: 2021 - 22											
	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22	Feb 22	Mar 22	Apr 22	May 22	Jun 22
SI 3 Hygiene & Decontamination										X		
SI 4 Occupational Monitoring										X		
SI 5 Communication & Traffic Control										X		
SI 6 First Aid										X		
SI 7 Heavy Machinery Operations										X		
SI 8 Exclusion Zones										X		
EMERGENCY RESPONSE PROCEDURES & INSTRUCTIONS												
ERP 1 Incident Prevention, Reporting & Investigation												X
ERP 2 Emergency Response Management												X
ERI 1 Injury & Evacuation Response												X
ERI 2 Waste Incident & Spill Response												X
ERI 3 Fire Response												X
ERI 4 Transport Emergency Response												X

AUDIT SCHEDULE APPROVED: LM DATE: June 2021 REVISION: 1

APPENDIX W

2021 – 2022 Management Review Meeting Agendas



IWDF MT WALTON EAST MANAGEMENT REVIEW MEETING

AGENDA

Date: Thursday 16th December 2021

Time: 9.00 am – OEOM to be held after the MRM

Venue: Meeting/Training Room, Aurora Environmental, Dilhorn House, 2 Bulwer St, Perth

1. Open and Welcome

1.1 Agenda Outline – LM

2. Minutes of the Previous Meeting

3. Business Arising from Previous Meeting

- 3.1 Meeting with the Radiation Health Unit to discuss the remaining discrepancies between the Radiation Health Database and the IWDF records (SP/MS/LM)
- 3.2 Chemical & Radioactive Waste Database/Registers - Update (SP/LM)
- 3.3 Long-term custodianship of the IWDF waste inventory database - discussion with RCWA (LM)
- 3.4 Record Keeping – ongoing project entering historical IWDF documents into Finance Document Management System (SN/EH)
- 3.5 Legal deposit - for relevant IWDF documents (LM)
- 3.6 Finance IWDF website content - status update (SN/LM)

4. IWDF Management Systems

- 4.1 Environmental, Health & Safety and Quality Policy review, update and signoff (LM)
- 4.2 Management Plans - updates (LM)
- 4.3 Management Manuals – updates (LM)
- 4.4 Registers – review and updates Legal & Other Requirements and Aspects and Impacts registers
- 4.5 Finance EHSQMS Procedures review, update, and approval (LM)
- 4.6 FMC EHSQMS & Procedures review, update, and approval (LM)
- 4.7 PCR July 2020 to June 2021 (LM)
- 4.8 Annual review of Dept of Finance R&D Schedule (EH/SN)

5. Action Plans

- 5.1 Performance against 2021 – 2022 Action Plan – status (LM)

6. Compliance Audits - Internal and External

- 6.1 Ministerial Statement (LM)
- 6.2 License, Permit and Registration (LM)
- 6.3 Finance Management System (LM)
- 6.4 FMC Management System (LM)
- 6.5 Management Plans - Performance against requirements of management plans (LM)
- 6.6 Ongoing Suitability of Management Plans (LM)
- 6.7 ARPANSA Audit Report V3 – as provided on 9th June 2021 (LM/SP)
- 6.8 Review / liaison with national and international intractable waste management facilities and regulators (LM)

7. Nonconformance and Corrective and Preventative Actions

7.1 Non – conformances from 2021 – 2022 audits to date (LM)

8. Electronic Document Library

8.1 Recent updates and changes (LM)

9. Guideline Review and Changes

9.1 Chemical Waste Acceptance Guidelines (LM)

9.2 Radioactive Waste Acceptance Proforma (SP/LM)

10. Monitoring

10.1 Groundwater (twice yearly) (MJS)

10.2 Capping (annual) (MJS)

10.3 Rehabilitation (annual) (MJS)

10.4 Dose constraint monitoring – report on monitoring results to date (SP)

11. IWDF Infrastructure

11.1 Access Road status report (EH/SN)

11.2 Access Road current condition report (MJS)

11.3 Replacement of Infrastructure – Fuel storage tank and generator (MJS)

12 Staff Training Needs

12.1 FMC Inductions (LM)

12.2 New Finance IWDF personnel inductions (LM)

13 Radioactive Issues

13.1 IWDF Safety Assessment / Operations Safety Case – status update (SP)

13.2 IWDF Safety Assessment / Post Closure Safety Case – status update (SP)

14 Community Liaison Committee

14.1 Discussion - various issues raised by the CLC during meetings since June 2021 (All)

14.2 Meeting frequency – submission to EPA to vary frequency (All)

15 FMC Performance

15.1 Performance against FMC 2021 – 2022 estimated costs (MJS)

15.2 FMC performance against Finance contract management plan (SN, EH)

16 Other Business

16.1 Reporting to Radiological Council – 2020/2021 PCR (LM)

16.2 Change of proponent submission – status update (SN)

16.3 DWER License renewal application – status update (SN/LM)

16.4 Radioactive Waste Disposal applications – new and updates to existing applications (RSO)

17 Next Meeting

To be scheduled for June 2022



IWDF MT WALTON EAST MANAGEMENT REVIEW MEETING

AGENDA

Date: Thursday 2 June 2022

Time: 9.15 am – *OEOM to be held after the MRM*

Venue: Meeting/Training Room, Aurora Environmental, Dilhorn House, 2 Bulwer St, Perth

1. Open and Welcome

1.1 Agenda Outline (LM)

2. Minutes of the Previous Meeting

3. Business Arising from Previous Meeting

3.1 Chemical & Radioactive Waste Database/Registers - Update (SP/LM)

3.2 Change of Proponent (SN)

3.3 DWER Licence renewal – status update (SN)

3.4 Reporting to RCWA – 2020 – 2021 PCR (LM)

3.5 RCWA feedback on publicly available IWDF Waste Inventory Database spreadsheet

3.6 Legal deposit (LM)

3.7 Finance IWDF website content - status update (SN/LM)

4. IWDF Management Systems

4.1 Environmental, Health & Safety and Quality Policy review, update, if required, and signoff (LM)

4.2 Management Plans - updates (LM)

4.3 Management Manuals – updates (LM)

4.4 Registers – review and updates Legal & Other Requirements and Aspects and Impacts registers

4.5 Finance EHSQMS Procedures review, update, and approval (LM)

4.6 FMC EHSQMS & Procedures review, update, and approval (LM)

4.7 PCR July 2020 to June 2021 (LM)

4.8 Draft PCR July 2021 to June 2022 (LM)

4.9 Annual review of Dept of Finance R&D Schedule (EH/SN)

5. Action Plans

5.1 Performance against 2021 – 2022 Action Plan – status (LM)

5.2 Draft 2022 – 2023 Action Plan

6. Compliance Audits

6.1 Ministerial Statement (LM)

6.2 License, Permit and Registration (LM)

6.3 Finance Management System (LM)

6.4 FMC Management System (LM)

6.5 Management Plans - Performance against requirements of management plans (LM)

6.6 Ongoing Suitability of Management Plans (LM)

6.7 Review / liaison with national and international intractable waste management facilities and regulators (LM)

7. Nonconformance and Corrective and Preventative Actions

7.1 Non-conformances from 2021 – 2022 audits to date (LM)

8. Electronic Document Library

8.1 Recent updates and changes (LM)

9. Guideline Review and Changes

9.1 Chemical Waste Acceptance Guidelines (LM)

9.2 Radioactive Waste Acceptance Proforma (SP/LM)

10. Monitoring

10.1 Groundwater (twice yearly) (MJS)

10.2 Capping (annual) (MJS)

10.3 Rehabilitation (annual) (MJS)

10.4 Dose constraint monitoring – report on monitoring results to date (SP)

10.5 5-yearly radiation monitoring – planning (SP)

11. IWDF Infrastructure

11.1 Access Road status report (EH/SN)

11.2 Access Road current condition report (MJS)

11.3 Disposal of old genset – status update (MS/SN)

12 Staff Training Needs

12.1 Training requirements (LM)

13 Radioactive Issues

13.1 IWDF Safety Assessment / Operations Safety Case – status update (SP)

13.2 IWDF Safety Assessment / Post Closure Safety Case – status update (SP)

14 Community Liaison Committee

14.1 Discussion - various issues raised by the CLC during meetings since June 2021 (All)

14.2 Meeting frequency – submission to EPA to vary frequency status update (All)

15 FMC Performance

15.1 Performance against FMC 2021 – 2022 estimated costs (MJS)

15.2 FMC estimated costs for 2022 – 2023 financial year

15.3 FMC performance against Finance contract management plan (SN, EH)

16 Other Business

16.1 Radioactive Waste Disposal applications – new and updates to existing applications (RSO)

16.2 IWDF Handbook – update V17

16.3 The frequency of review of current disposal practices and awareness of international best practices and advances in technology

17 Next Meeting

To be scheduled for December 2022

APPENDIX X

2021 – 2022 Site Visit Checklists

**INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA
SITE VISIT CHECKLIST
IWDF-FORM-52**

Pre-Visit Check	Tick
You will be visiting the site with at least one other person	<input checked="" type="checkbox"/>
At least one person from Finance (e.g., IWDF Project Manager) is aware of your visit	<input checked="" type="checkbox"/>
You have a satellite phone and will phone a nominated person to inform them of your safe arrival & return	<input checked="" type="checkbox"/>

Site Visit Check	
Reason for Inspection/Visit: GROUNDWATER MONITORING	
Visitor/Inspector: MJS	Affiliation: AURORA ENVIRONMENTAL
Other Visitors (at least one other person to be at site): SP	
Date: 4/4/2022 - 6/4/2022	
Time Arrived: 1845	Time Departed: 1030

Issue/Action	Checked (tick)	Comments (Give any details regarding quantities of supplies, non-compliance, requirements for maintenance, etc.)
Access Road Condition Report	<input checked="" type="checkbox"/>	IWDF Form-44
General Supplies	<input checked="" type="checkbox"/>	
Fuel	<input checked="" type="checkbox"/>	IWDF Form-51
Water - potable	<input checked="" type="checkbox"/>	FULL
Water - non-potable	<input checked="" type="checkbox"/>	1/2 FULL
Food/provisions/domestic supplies	<input checked="" type="checkbox"/>	
Security		
Locks to all buildings intact	<input checked="" type="checkbox"/>	
All trench fences intact & locked	<input checked="" type="checkbox"/>	
All signs to fences intact/present	<input checked="" type="checkbox"/>	STILL NEED 2020 NRTO1 SIGN
Infrastructure		
Fire extinguishers in place	<input checked="" type="checkbox"/>	
Generator operational	<input checked="" type="checkbox"/>	
Kitchen/toilet operational	<input checked="" type="checkbox"/>	
Weather station intact	<input checked="" type="checkbox"/>	DECOMMISSIONED
Phone & internet operational	<input checked="" type="checkbox"/>	USE MOBILE SATPHONE
Above ground markers intact	<input checked="" type="checkbox"/>	
Maintenance		
Electrical tagging up to date	<input checked="" type="checkbox"/>	DONE
Fire extinguishers checked	<input checked="" type="checkbox"/>	
Generator serviced	<input checked="" type="checkbox"/>	NOT DUE
Monitoring		
Groundwater monitoring	<input checked="" type="checkbox"/>	IWDF Form-03
Capping monitoring	<input checked="" type="checkbox"/>	IWDF Form-38b
Rehabilitation monitoring	<input checked="" type="checkbox"/>	IWDF Form-38a
Radiation monitoring	<input checked="" type="checkbox"/>	RI-01
Firebreaks/camp/access road check	<input checked="" type="checkbox"/>	FIREBREAK REQUIRES MAINTENANCE
Other (specify)	<input checked="" type="checkbox"/>	
Post-Visit Check		Time Departed: 0815
Confirmed safe return: YES		Time: 1450
Signed: MJ Shepherd		Date: 6/4/2022

Original to FMC Project Manager. Copy to Finance IWDF Project Manager.

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA
SITE VISIT CHECKLIST
IWDF-FORM-52

Pre-Visit Check	Tick
You will be visiting the site with at least one other person	<input checked="" type="checkbox"/>
At least one person from Finance (e.g., IWDF Project Manager) is aware of your visit	<input checked="" type="checkbox"/>
You have a satellite phone and will phone a nominated person to inform them of your safe arrival & return	<input checked="" type="checkbox"/>

Site Visit Check	
Reason for Inspection/Visit: GROUNDWATER, REHABILITATION & CAPPING MONITORING	
Visitor/Inspector: MJS	Affiliation: AURORA ENVIRONMENTAL
Other Visitors (at least one other person to be at site): SP	
Date: 11/10/2021 - 14/10/2021	
Time Arrived: 1815	Time Departed: 1030

Issue/Action	Checked (tick)	Comments (Give any details regarding quantities of supplies, non-compliance, requirements for maintenance, etc.)
Access Road Condition Report	<input checked="" type="checkbox"/>	IWDF Form-44
General Supplies	<input checked="" type="checkbox"/>	
Fuel	<input checked="" type="checkbox"/>	IWDF Form-51 NEW TANK SUPPLIED WITH 1000L
Water - potable	<input checked="" type="checkbox"/>	FILLED (ADDED 27,000L) ∴ ~ 42,000L
Water - non-potable	<input checked="" type="checkbox"/>	1/5 FULL
Food/provisions/domestic supplies	<input checked="" type="checkbox"/>	
Security		
Locks to all buildings intact	<input checked="" type="checkbox"/>	
All trench fences intact & locked	<input checked="" type="checkbox"/>	
All signs to fences intact/present	<input checked="" type="checkbox"/>	NEED 2020 NRT01 SIGN MADE
Infrastructure		
Fire extinguishers in place	<input checked="" type="checkbox"/>	
Generator operational	<input checked="" type="checkbox"/>	
Kitchen/toilet operational	<input checked="" type="checkbox"/>	
Weather station intact	<input checked="" type="checkbox"/>	DECOMMISSIONED
Phone & internet operational	<input checked="" type="checkbox"/>	MOBILE SATPHONE USED
Above ground markers intact	<input checked="" type="checkbox"/>	
Maintenance		
Electrical tagging up-to-date	<input checked="" type="checkbox"/>	
Fire extinguishers up-to-date	<input checked="" type="checkbox"/>	
Generator serviced	<input checked="" type="checkbox"/>	GENERATOR NEW - WORKED PERFECTLY
Monitoring		
Groundwater monitoring	<input checked="" type="checkbox"/>	IWDF Form-03
Capping monitoring	<input checked="" type="checkbox"/>	IWDF Form-38b
Rehabilitation monitoring	<input checked="" type="checkbox"/>	IWDF Form-38a
Radiation monitoring	<input checked="" type="checkbox"/>	RI-01
Firebreaks/camp/access road check	<input checked="" type="checkbox"/>	
Other (specify)	<input checked="" type="checkbox"/>	

Post-Visit Check	Time Departed: 0715
Confirmed safe return: YES	Time: 1905
Signed: Mg Shepherd	Date: 14/10/2021

Original to FMC Project Manager. Copy to Finance IWDF Project Manager.

APPENDIX Y

2021 – 2022 Dangerous Goods Storage Inventory Records

INTRACTABLE WASTE DISPOSAL FACILITY
 MT WALTON EAST, WESTERN AUSTRALIA

DANGEROUS GOODS STORAGE RECORD IWDF-FORM-51

Date: 6/4/2022 Completed by: MJS

Item (technical name)	UN No.	Class	Packaging Group	DG Factor	No. of Packages	Type of Packages	Total Volume (L)	Location	Storage Factor (Factor x vol.)	MSDS on site	Comments
Diesel tank bounded area											
DIESEL FUEL	-	3	(C1)	0.2	1	2000L AST	100L	DTB AREA	20		
DIESEL FUEL	-	3	(C1)	0.2	1	GENERATOR	85L	DTB AREA	17		
DIESEL FUEL	-	3	(C1)	0.2	1	2000L SBST	1175L	DTB AREA	235		
Total volume manufactured products =										Total volume flammable (II) =	Total volume C1 & C2 =
										= 272	1360L
Sea-container											
<u>N/A</u>											
Total volume manufactured products =										Total volume flammable (II) =	Total volume C1 & C2 =
										=	=

INTRACTABLE WASTE DISPOSAL FACILITY
MT WALTON EAST, WESTERN AUSTRALIA

SUMMARY – Compliance with Requirements Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 and DG Licence

Storage Factor for each storage area 1000 or less?

Yes/ No

Details:

Is the current storage classed as minor storage?
(e.g., less than 250L flammable (petrol), 5,000L C1 & C2 (diesel and oil)
and 250L manufactured product in any one storage area)?

Yes/ No

Details:

If no to both, is there a DG licence for the site? (There should be, or changes are required) Yes/No Details:

ATTRACTABLE WASTE DISPOSAL FACILITY
 MT WALTON EAST, WESTERN AUSTRALIA

DANGEROUS GOODS STORAGE RECORD IWDF-FORM-51

Date: 14/10/2021 Completed by: MJS

Item (technical name)	UN No.	Class	Packaging Group	DG Factor	No. of Packages	Type of Packages	Total Volume (L)	Location	Storage Factor (Factor x vol.)	MSDS on site	Comments
Diesel tank bounded area											
DIESEL FUEL	-	3	(C1)	0.2	1	2000 LAST	100L	DTB AREA	20		
DIESEL FUEL	-	3	(C1)	0.2	1	GENERATOR	86L	DTB AREA	17		
DIESEL FUEL	-	3	(C1)	0.2	1	2000-SBST	1150L	DTB AREA	230		
Total volume manufactured products =									Total SF =	Total volume C1 & C2 =	
									= 267	1336L	
Sea-container											
N/A											
Total volume manufactured products =									Total SF =	Total volume C1 & C2 =	

SUMMARY – Compliance with Requirements Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 and DG Licence

Storage Factor for each storage area 1000 or less?

Yes/No

Details:

Is the current storage classed as minor storage?
(e.g., less than 250L flammable (petrol), 5,000L C1 & C2 (diesel and oil)
and 250L manufactured product in any one storage area)?

Yes/No

Details:

If no to both, is there a DG licence for the site? (There should be, or changes are required) Yes/No Details:

APPENDIX Z

CLC Minutes 24 June 2020



Intractable Waste Disposal Facility (IWDF), Mount Walton - East Community Liaison Committee (CLC) Quarterly Meeting

Final

Chairperson:	Emma Savage-Jones	Date & Time:	24 June 2020 10.00am
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
		Meeting No.	2019/20 Q4

Attendees:		
Jan McLeod	(JMC)	Coolgardie Community (83 Kingswood St, Widgiemooltha)
Anna Killigrew	(AK)	Coolgardie Community (Koora Retreat Centre)
Tracey Rathbone	(TR)	Deputy Shire President, Shire of Coolgardie
Emma Savage-Jones	(ESJ)	IWDF Project Director, Department of Finance (Chairperson)
Brendon Atkinson	(BA)	IWDF Contract Manager, Department of Finance
Leanne Morton	(LM)	IWDF FMC Project Manager
Mark Shepherd	(MJS)	IWDF FMC Project Director / Operations Manager
Peter Harrison	(PH)	Coolgardie Community (Koora Retreat Centre)
David Williams	(DW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Grayson Hindmarsh	(GH)	Executive Manager Regulatory Services, Shire of Yilgarn
Bryan Close	(BC)	Deputy Shire President, Shire of Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
Stuart Parr	(SP)	IWDF Radiation Safety Officer

Apologies		
James Trail	(JT)	CEO, Shire of Coolgardie
Mal Cullen	(MC)	President, Shire of Coolgardie
Lynn Webb	(LW)	Proposed Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Abnesh Chetty	(AC)	DWER Environmental Officer, Licensing (Waste/North)
Robert Hicks	(RH)	Director of Operations, Shire of Coolgardie
Rod Franklin	(RF)	Commercial Manager, Shire of Coolgardie
Peter Money	(PM)	CEO, Shire of Menzies
Peter Clarke	(PC)	CEO, Shire of Yilgarn

Observer	
Madison Snow, ABC News Kalgoorlie	
Taylar Amonini, Kalgoorlie Miner	

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>ESJ declared the meeting open at 10.00am</p> <p>ESJ acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>ESJ introduced herself and explained her role as the Intractable Waste Disposal Facility (IWDF) Project Director, representing the Department of Finance, the Proponent for the IWDF, Mount Walton East.</p> <p>ESJ welcomed all committee members present and thanked them for making the time to attend the meeting.</p> <p>ESJ thanked the public observers Madison Snow from ABC News Kalgoorlie and Taylor Amonini from the Kalgoorlie Miner for attending the meeting.</p> <p>ESJ also advised that observers are not able to participate in the meeting, however there would be an opportunity at the end of the meeting for observers to ask any questions related to the IWDF.</p> <p>ESJ informed those present that a hardcopy two-page information sheet about the IWDF was available at the meeting for those interested. Hardcopies were provided to committee members and observers.</p> <p>ESJ informed those present that Stuart Parr the IWDF's Radiation Safety Officer, would be providing a presentation as part of the agenda.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p>	
4.0	<p>Previous Minutes</p> <p>Draft minutes from the previous meeting, held 20 February 2020, were distributed via email to the CLC (with hardcopy to Jan McLeod) for comment.</p> <p>ESJ asked the committee if there were any further amendments to the draft minutes.</p> <p>No further amendments were requested, and the Committee members present agreed that the draft minutes for the 20 February 2020 meeting were a true and accurate record and could be finalised.</p>	

5.0	<p>Business Arising from Previous Minutes</p> <p>ESJ called for any business arising from the previous minutes noting that there was one item listed on the agenda. No further items were raised.</p> <p>ESJ noted that Actions at 6.6 and 7.2 of the previous minutes have been completed.</p> <p>5.1 MP-14 and SI-05 to be provided to Tracey Rathbone</p> <p>LM reported that due to an email delivery issue TR had not received the email containing the electronic versions of MP-14 and SI-05 as requested at the last meeting. LM therefore provided hardcopy of MP-14 and SI-05 to TR at the meeting.</p> <p>5.2 Consideration of nomination form to become a member of the CLC from Lynn Webb</p> <p>The nomination form submitted by Lynn Webb detailing his intentions as a CLC member was included in an email to the CLC dated 11 June 2020 for their consideration.</p> <p>ESJ invited the CLC to confirm Lynn Webb be as a new CLC member representing the Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn. The motion was carried by the CLC.</p>													
6.0	<p>Management of the IWDF</p> <p>6.1 Management Review Meeting</p> <p>LM reported that the IWDF Management Review Meeting was held on 23 June 2020. The minutes of this meeting were not yet finalised but would be available at the next CLC meeting.</p> <p>6.2 Performance and Compliance Reporting (PCR)</p> <p>LM reported that work on the PCR for the current financial year was progressing but would not be completed until after the end of the financial year and once the disposal close-out report was finalised, as the close-out report must be included as part of the annual PCR for submission to the EPA.</p> <p>6.3 Compliance Auditing</p> <p>LM reported that the compliance auditing for the current financial year was now almost complete with only some elements of the IWDF FMC Health and Safety Management Systems left to audit.</p> <table border="1" data-bbox="213 1821 1182 2074"> <thead> <tr> <th></th> <th>Instrument</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>6.3.1</td> <td>Ministerial Statement 562</td> <td>No non-compliances</td> </tr> <tr> <td>6.3.2</td> <td>Department of Finance, Building Management and Works Environmental Licence (DWER)</td> <td>No non-compliances</td> </tr> <tr> <td>6.3.3</td> <td>Radiological Council Registration (RCWA)</td> <td>No non-compliances</td> </tr> </tbody> </table>		Instrument	Status	6.3.1	Ministerial Statement 562	No non-compliances	6.3.2	Department of Finance, Building Management and Works Environmental Licence (DWER)	No non-compliances	6.3.3	Radiological Council Registration (RCWA)	No non-compliances	
	Instrument	Status												
6.3.1	Ministerial Statement 562	No non-compliances												
6.3.2	Department of Finance, Building Management and Works Environmental Licence (DWER)	No non-compliances												
6.3.3	Radiological Council Registration (RCWA)	No non-compliances												

6.3.4	Department of Foreign Affairs and Trade, The Australian Safeguards and Non-Proliferation Office (ASNO) Permit	No non-compliances
6.3.5	Department of Finance, Building Management and Works - Environmental, Health and Safety Management Systems	1 non-compliance MRM technically not held within 12 months
6.3.6	IWDF (FMC) - Health and Safety Management Systems	No non-compliances to date but audit not yet completed.
6.3.7	Department of Finance, Building Management and Works - Management Plans	1 non-compliance MRM technically not held within 12 months

6.4 Five Yearly Technical Audit by ARPANSA

LM reported that the ARPANSA Five Yearly Technical Audit Report received in late February 2020 reporting on the technical audit undertaken by a representative of ARPANSA (Australian Radiation Protection and Nuclear Safety Agency) in October 2018 had now been reviewed.

The audit report identified four non-compliances and documented six recommendations for improvement. It should be noted that many of the areas identified for improvement relate to the post-closure safety assessment and safety case.

LM reported that a response to the ARPANSA Five Yearly Technical Audit was currently being prepared and would be sent to ARPANSA when complete.

6.5 Operational Safety Assessment and Safety Case

The draft Operational Safety Assessment and Safety Case document was provided to ARPANSA for third party review in October 2016 but since then there has been almost no feedback or comment regarding this document from ARPANSA. It is of note that a representative of ARPANSA agreed to review the draft Operational Safety Assessment / Case document and provide feedback prior to the document being submitted to ARPANSA.

ESJ reported that recently she has had several discussions with representatives of ARPANSA about this document but to date there is still no clear way forward on how a third-party review can be achieved.

PN asked if ARPANSA had accepted or acknowledged that the time delay regarding this document was unacceptable. PN further commented that review of the draft Operational Safety Assessment / Case document and subsequent implementation should be made a priority.

ESJ responded that achieving third party review of the Operational Safety Assessment / Case is a priority for the Proponent.

6.6 IWDF Access Road Report

6.6.1 IWDF Access Road Condition

MJS reported that the IWDF Access Road was in good condition except for some rutting just after the railway line. The first 32 km from the Great Eastern Highway turn-off has been upgraded and then approximately 25 km south of the Sandy Ridge turn-off has been upgraded. MJS reported that the use of water during the upgrade work had significantly improved the result of the work.

AK reported that on the previous Friday afternoon there had been significant use of the IWDF Access Road during very heavy rainfall.

MJS responded that if there was any damage because of the use of the Access Road during heavy rainfall then Tellus Holdings would be responsible for repairing this damage to the road.

6.6.2 IWDF Access Road Management

AK asked how CLC members can contact the Department of Finance to report issues to do with the IWDF Access Road now that the Department had taken responsibility for the Access Road.

ESJ informed the CLC that contact with the Department of Finance about issues related to the IWDF should be done by using the IWDF email address IWDF-MountWalton@finance.wa.gov.au. Contact made via this email address is seen by both ESJ and BA at the Department of Finance which will ensure that issues are addressed in a timely fashion.

ESJ reported that the Road Use Agreement with Tellus Holdings has now been executed commencing 1 May 2020 for an initial five-year term.

AK requested the content of the long-term agreement.

ESJ replied that the agreement would not be shared as it was commercial in confidence.

ESJ reported that BA has the responsibility for actively managing the requirements of the agreement and further commented that the Department of Finance will undertake a regular review of the agreement requirements to ensure that the agreement is working as it should.

JMc requested that if aspects of the Road Use Agreement are modified for any reason that this is reported to the CLC.

BA agreed that this would occur.

JMc asked if the IWDF had priority when using the Access Road?

ESJ responded that the transport of waste to the IWDF has priority over other road users.

JMc asked who is responsible for the portion of the IWDF Access Road from the Mt Dimer turnoff to the IWDF (4km).

ESJ responded that the Department of Finance has responsibility for this portion of the IWDF Access Road.

JMc asked what the official name of the IWDF Access Road is?

	<p>Post meeting note: As a private access road there is no 'official name' however in IWDF management documents the access road is referred to as 'access road' or 'IWDF Access Road'.</p> <p>AK asked the representatives from the Shire of Yilgarn if they close the Mt Dimer access road during periods of heavy rainfall?</p> <p>GH responded that the Shire of Yilgarn can close the road during periods of heavy rainfall but do not usually do so. The Shire is responsible for many minor roads and during periods of heavy rainfall cannot get to every minor road to put 'road closed' signs in place.</p>	
7.0	<p>CLC Terms of Reference Review</p> <p>7.1 Updates to the Terms of Reference</p> <p>The CLC Terms of Reference now include "Expression of Interest" information appended to the end of the Terms of Reference. The updated Terms of Reference (Revision 14) were emailed to CLC members 11 June 2020.</p> <p>7.2 Nominations for CLC Members</p> <p>LM reported that there had been no new nominations for Community Representatives.</p>	
8.0	<p>Waste Disposals</p> <p>8.1 Waste Enquiries</p> <p>LM reported that there have been several radioactive waste enquiries since the last meeting.</p> <p>8.2 Waste Acceptance Applications</p> <p>LM reported that four waste acceptance proformas had been received since the last meeting and all were currently being reviewed / assessed by the RSO.</p> <p>8.3 Disposal Operation 2020NRT01</p> <p>MJS reported that the:</p> <ul style="list-style-type: none"> • 2020NRT01 disposal operation was now complete. • Disposal operation was delivered as planned, on time and just under budget. • Disposal cell was 10-metre-long at the base with a 56-metre ramp. • FMC personnel spent a total of 13 weeks at the IWDF. • Waste delivery was extended due to periods of heavy rainfall which required closure of the IWDF Access Road for several days on more than one occasion. • Disposal cell has been fenced and all appropriate signs have been installed. 	
9.0	<p>Presentation from the IWDF Radiation Safety Officer</p> <p>SP IWDF RSO provided the CLC with some information about his background:</p> <ul style="list-style-type: none"> • Started working in the radiation industry in 1986 in the UK 	

	<ul style="list-style-type: none"> • Was originally working on complex shielding designs • Then moved to doing safety cases for the nuclear industry • Moved to Australia several years ago and is currently a Senior Radiation Protection Advisor. • SP, the Radiological Council of Western Australia approved RSO for the IWDF, was engaged by the Department of Finance 29th August 2017. <p>Presentation – Refer to the attached.</p> <p>JMc asked if the standards described in the presentation applied to all facilities operating in Western Australia?</p> <p>SP responded yes.</p> <p>BC asked who were ASNO and what was their interest in the IWDF? SP responded that ASNO were the Australian Safeguards and Non-Proliferation Office of the Department of Foreign Affairs and Trade. ASNO are only interested in fissile material.</p>	
10.0	<p>General Business</p> <p>10.1 Internal Restructure Department of Finance</p> <p>ESJ reported that there had been a restructure within the Department of Finance, and the IWDF will now sit within a Directorate called Buildings and Contracts (replacing Building Management and Works).</p> <p>ESJ stated that there would be no change to the management of the IWDF, and that ESJ and BA would remain as the Proponent’s representatives for the IWDF for the foreseeable future.</p> <p>10.2 Role of the CLC as Described in Meeting Advertisement</p> <p>JMc requested that future advertisements for community members and meeting notifications be modified. JMc explained that the sentence in the advertisement, as shown below, did not adequately describe the role of community committee members on the CLC.</p> <p><i>The role of the CLC is to ensure that the community remains informed of activities at the IWDF.</i></p> <p>JMc requested that the sentence be replaced with dot point 1 from the Committee Functions section of the CLC Terms of reference, as shown below.</p> <p><i>Provide a forum for interested community members to raise issues relating to the operation and management of the IWDF.</i></p> <p>10.3 Format of Meeting Minutes</p> <p>JMc requested that the current format of the meeting minutes be converted back to the previous format. JMc expressed concern that the Department of Finance logo appeared on every page of the previous minutes which gave the impression that the CLC was part of the Department of Finance and not an independent committee.</p>	

The Department of Finance logo did appear on every page for the October 2019 meeting minutes, but this was a formatting error and has now been corrected.

There was general discussion about this request, but no agreement was reached therefore the minutes remain in the current format.

10.4 Changes to Ministerial Statement 562

JMc requested that the Proponent revisit the request to remove Commitment 7 of Ministerial Statement 562 which limits waste disposed of at the IWDF to waste generated in WA.

JMc provided some background to this request for new members:

- At the 25 July 2019 meeting, JMcl and AK made a formal request that the proponent make application to the Environmental Protection Authority to remove the condition restricting the waste disposed at the IWDF to Western Australian waste only to allow the IWDF to consider all Australian waste.
- At the 24 October 2019 CLC meeting, the CLC has requested that the Proponent make application to the EPA to have Commitment 7 removed from Statement 562. This requested was proposed by Mal Cullen, Coolgardie Shire President.
- The Radiological Council Western Australia had previously expressed support of this action.
- At the 20 February 2020 CLC meeting, ESJ reported that the Department of Finance would not be pursuing this request.

JMc expressed disappointment in the Proponent and asked that the issue is discussed further.

ESJ responded by stating that the role of the Department of Finance is to operate the Intractable Waste Disposal Facility (IWDF), not to set waste management policy in Western Australia.

It is not the role, nor in the Terms of Reference, of the CLC to advocate for changes to waste management policy in Western Australia.

The role of the CLC is primarily to raise issues relating to the operations and management of the IWDF, provide a community forum for concerns and to provide information, data and monitoring results back to the community.

Anyone interested in lobbying for changes to the usage of this facility should pursue this through the appropriate channels.

JMc responded by stating that limiting waste disposed of at the IWDF to waste generated in WA is not waste management policy.

	<p>AK confirmed that the CLC community members were aware that it is not their role to change policy but reiterated that the CLC is not requesting a change in policy but to just remove a simple condition.</p> <p>JMc asked the proponent if a Section 46 (s46) document requesting changes to the Ministerial Statement 562 was currently being prepared.</p> <p>ESJ responded that a s46 document was not currently being prepared.</p> <p>JMcL further commented that the CLC was involved in the last s46 amendment which was published in December 2000 with consultation with the CLC starting in 1997 as recorded in the minutes of every CLC meeting.</p>	
11.0	<p>Close / Scheduling of Next Meeting</p> <p>11.1 The meeting was closed at 12:17 pm</p> <p>11.2 Next meeting:</p> <p>It was suggested that the next meeting be held in late September or early October 2020.</p> <p>Dates suggested were Thursday 17 September, Thursday 24 September, Thursday 15 October.</p> <p>JMc requested that the next meeting be held 3 September 2020.</p> <p>It was agreed that options for dates for the next meeting would be sent to the CLC with the draft minutes of this meeting.</p>	

APPENDIX AA

CLC Minutes 10 June 2021

Meeting Minutes

Intractable Waste Disposal Facility (IWDF), Mount Walton - East Community Liaison Committee (CLC) Quarterly Meeting

Chairperson:	Emma Savage-Jones	Date & Time:	10 June 2021, 10:19am to 12:00pm
Meeting:	IWDF, Mount Walton East Community Liaison Committee Meeting	Venue:	Coolgardie Community Recreation Centre, Sylvester St, Coolgardie
Version	Final Rev 1	Meeting No.	2020/21 Q4

Attendees:		
Jan McLeod	(JMCL)	Coolgardie Community Representative
Anna Killigrew	(AK)	Coolgardie Community Representative
Peter Harrison	(PH)	Coolgardie Community Representative
Mal Cullen	(MC)	President, Shire of Coolgardie
Tracey Rathbone	(TR)	Deputy Shire President, Shire of Coolgardie
Emma Savage-Jones	(ESJ)	IWDF Project Director, Department of Finance (Chairperson)
Nic Warren	(NW)	Executive Manager Regulatory Services, Shire of Yilgarn
Bryan Close	(BC)	Deputy Shire President, Shire of Yilgarn
Phil Nolan	(PN)	Councillor, Shire of Yilgarn
Mark Shepherd	(MS)	IWDF FMC Project Director / Operations Manager
Eleanor Hopkins	(EH)	Department of Finance
Suzie Williams	(SW)	Coolgardie Community Representative
Lynn Webb	(LW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn

Apologies		
David Williams	(DW)	Community Representative – Western Australian community outside the shires of Coolgardie, Menzies and Yilgarn
Leanne Morton	(LM)	IWDF FMC Project Manager

Observer
Nathan Blight, Manager Technical Services Tellus Holdings

Meeting Agenda		
Item		Action / When
1.0	<p>Open the Meeting and Welcome</p> <p>ESJ declared the meeting open at 10.19 am.</p> <p>ESJ acknowledged the Traditional Owners of the land on which the meeting was held and paid her respects to Elders past, present and emerging.</p> <p>ESJ introduced herself and explained her role as the Intractable Waste Disposal Facility (IWDF) Project Director, representing the Department of Finance, the Proponent for the IWDF, Mount Walton East.</p> <p>ESJ welcomed all committee members present and thanked them for making the time to attend the meeting.</p> <p>ESJ thanked the public observers, Nathan Blight (Manager Technical Services, Tellus Holdings) for attending the meeting. ESJ also advised that observers are not able to participate in the meeting, however there would be an opportunity at item 6.6 for the observer to ask any questions related to the IWDF.</p>	
2.0	<p>Apologies</p> <p>Apologies were noted and are documented at the beginning of these minutes.</p>	
3.0	<p>Introductions</p> <p>Each member present introduced themselves providing their name and the type of membership they are representing on the CLC (documented at the beginning of these minutes).</p>	
4.0	<p>Previous Minutes</p> <p>The draft minutes for the previous meeting held on 1 April 2021 were distributed on 12 April 2021 via email, with a hardcopy to Jan McLeod.</p> <p>JMcL requested that in future, minutes be posted earlier as she has not received her copy of the December minutes yet. JMCL stated the ToR require the minutes to be sent two (2) weeks after the meeting date. ESJ committed to sending the minutes within this timeframe along with a draft agenda for the next meeting.</p> <p>ESJ asked the committee if there were any further amendments to the draft minutes.</p> <p><u>April 2021 Minutes</u> JMCL requested the minutes be updated at item 5.5 to state that the professionalism of the minutes as prepared by LM was supported by members of the CLC. ESJ supported this change.</p> <p>MC moved that the minutes be accepted. AK seconded.</p>	<p>Issue these minutes and a draft agenda for the 14 October 2021 meeting by 24 June 2021.</p>

5.0	<p>Business Arising from Previous Minutes</p> <p>5.1 EOI for Suzie Williams</p> <p>ESJ stated that SW has submitted an EOI to join the CLC and requested the Committee confirm acceptance of her EOI.</p> <p>JMcL confirmed and TR seconded. ESJ confirmed SW is now a member of the CLC.</p> <p>5.2 Minutes of the 8 December 2020 CLC Meeting</p> <p>PN requested the word 'Minutes' be added to the header of previous meeting minutes. ESJ confirmed she would do this.</p> <p>ESJ confirmed the minutes were a true reflection of the meeting of 8 December 2020.</p> <p>5.3 Update on the Access Road Railway Crossing</p> <p>ESJ advised this would be provided at item 9.2.</p>	The word 'Minutes' to be added to previous meeting minutes.																		
6.0	<p>Management of the IWDF</p> <p>6.1 Performance and Compliance Reporting July 2019 – June 2020.</p> <p>ESJ advised a copy of the draft 2019 – 2020 PCR, which includes the Close-out Report for the 2020NRT01 Disposal Operation, was submitted to the EPA for approval via the Department of Water and Environmental Regulation (DWER) website, on the 30 September 2020.</p> <p>The EPA provided notification to Finance on 4 May 2021 stating that the report was consistent with Commitment 6 of Ministerial Statement 562 and may now be advertised as publicly available.</p> <p>On 31 May 2021, within 4 weeks of obtaining approval from the EPA, an advertisement was placed in the public notices section of the Western Australian and Kalgoorlie Miner newspapers to inform the public in accordance with condition 6.2 of Ministerial Statement 562.</p> <p>JMcL commented the report was of very good quality, very comprehensive and informative.</p> <p>6.2 Compliance Auditing 2020/21</p> <p>MS advised the following:</p> <table border="1" data-bbox="213 1644 1182 2038"> <thead> <tr> <th></th> <th>Instrument</th> <th>Status</th> </tr> </thead> <tbody> <tr> <td>6.3.1</td> <td>Ministerial Statement 562</td> <td>No non-compliances</td> </tr> <tr> <td>6.3.2</td> <td>Department of Finance, Building Management and Works Environmental Licence (DWER)</td> <td>No non-compliances</td> </tr> <tr> <td>6.3.3</td> <td>Radiological Council Registration (RCWA)</td> <td>No non-compliances</td> </tr> <tr> <td>6.3.4</td> <td>Department of Foreign Affairs and Trade, The Australian Safeguards and Non-Proliferation Office (ASNO) Permit</td> <td>No non-compliances</td> </tr> <tr> <td>6.3.5</td> <td>Department of Finance, Building Management and Works - Environmental, Health and Safety Management Systems</td> <td>No non-compliances</td> </tr> </tbody> </table>		Instrument	Status	6.3.1	Ministerial Statement 562	No non-compliances	6.3.2	Department of Finance, Building Management and Works Environmental Licence (DWER)	No non-compliances	6.3.3	Radiological Council Registration (RCWA)	No non-compliances	6.3.4	Department of Foreign Affairs and Trade, The Australian Safeguards and Non-Proliferation Office (ASNO) Permit	No non-compliances	6.3.5	Department of Finance, Building Management and Works - Environmental, Health and Safety Management Systems	No non-compliances	
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6.3.6	IWDF (FMC) – Environmental, Health and Safety Management Systems	No non-compliances	
6.3.7	Department of Finance, Building Management and Works – Management Plans	No non-compliances	
	<p>6.3 Performance and Compliance Reporting July 2020 – June 2021 MS advised a draft copy of the 2020 - 2021 PCR was reviewed by the Management Team during the meeting. The 2020 - 2021 PCR would be finalised in early July 2021 after which a copy can be circulated to the CLC.</p> <p>6.4 Management Review Meeting. ESJ advised the MRM was held 3 June 2021. Minutes and updates to system documents are available to CLC members on request.</p> <p>JMcL stated copies should be circulated to all members, not only on request. ESJ confirmed a copy would be posted to JMCL and other members could request a copy.</p> <p>6.5 Technical Audit Report for audit by ARPANSA undertaken Oct 2018. ESJ advised final audit report has now been provided by ARPANSA on 9 June 2021. ESJ advised she had brought a printed copy to the meeting and will provide to JMCL. Other members can be provided a copy on request.</p> <p>ESJ stated that this report found two (2) partial non-compliances and five (5) recommendations which is an improvement on the previous report in 2013 which identified 5 non-compliance and 16 recommendations.</p> <p>MS provided clarification regarding the two (2) partial non-compliances, stating that one was regarding the absence of underground markers on site and advised this was deliberate and will be rectified following rehabilitation of the area. The second partial non-compliance requested a public dose limit be set for the site, which is difficult to measure, as the public very rarely visit the site. MS advised a public dose limit of 1mSv has been set now, together with a public dose constraint set at 0.3mSv and addresses the non-compliance. To collect recordable data MS wears a monitor when on site and future visitors to the site, when no disposal operations are occurring will also be asked to wear a monitor to allow measurements to be taken at that point in time.</p> <p>ESJ tabled the audit report.</p> <p>6.6 IWDF Safety Assessment and Safety Case. ESJ advised the proponent response to the Draft Safety Assessment and Safety Case was provided to RCWA 8 December for comment/feedback and is still with the RCWA.</p> <p>ESJ asked whether NB had any questions at this point. NB advised he had no questions.</p>		<p>Circulate 2020-2021 Performance and Compliance Report to CLC members once finalised.</p> <p>A copy of the Management Review Committee minutes of 3 June 2021 to be posted to JMCL.</p>
7.0	<p>7.1 IWDF Terms of Reference Draft Revision 17. ESJ advised the updated IWDF CLC Terms of Reference and Operating Guidelines, as agreed at the CLC meeting held 1 April, was emailed (hardcopy to Jan McLeod) to the CLC 12 April 2021. No comment has been received from the CLC.</p> <p>ESJ asked whether there were any further comments. JMCL stated that the minutes ask for the Terms of Reference and Operating Guidelines to be final however can they be amended at a future date. TR advised the Terms of Reference and Operating Guidelines state that an annual review of the Terms of Reference and Operating Guidelines is required.</p>		

	<p>AK moved to accept the Terms of Reference and Operating Guidelines. TR and MC seconded.</p>	
<p>8.0</p>	<p>Waste Disposals</p> <p>8.1 Waste enquiries MS stated two follow up enquiries from chemical waste owners had been received.</p> <p>8.2 Waste acceptance applications MS advised from October 2020 - 21 radioactive waste applications have been assessed by the RSO and the reports provided to Finance. Finance has sent letters to all 21 waste owners informing them that they must now obtain a disposal permit from RCWA and then their waste can be disposed at the IWDF if / when a disposal occurs.</p> <p>LW queried what radiological waste is. MS advised it is low level radioactive waste ranging from hospital waste to industrial gauges. PH queried whether it was Class 5 and MS confirmed it was if the activity concentrations were greater than acceptable to a Class 4 facility. PH stated the issue is of quantity and MS confirmed this was the case and nothing can be taken by the facility until the owners have obtained their disposal permits.</p> <p>AK stated that she feels uncomfortable asking about the waste disposal status due to a representative from Tellus being present in the room.</p> <p>PH stated the waste needs to go into the ground to protect the citizens of WA and where it goes is not important provided it is disposed of safely. PH recommended Finance and Tellus liaise with each other to seek opportunities to efficiently bury the waste each facility has rather than leave it sitting above ground. ESJ advised the IWDF does not store waste at the IWDF. Waste Owners are responsible for their waste until such time a disposal can be made.</p> <p>PH confirmed he knows this but there is waste sitting around above ground at Tellus and elsewhere and something needs to happen about this. PH suggested the relevant Minister be advised of this so that people of competence can do something about it. IWDF are receiving a small amount and Sandy Ridge are receiving a huge amount. The issue is the sensible disposal of intractable waste rather than it sitting around.</p> <p>MC made an observation that some of the comments being made are diverting away from the Terms of Reference and Operating Guidelines and if members want to go down that path, they should do so through government channels. ESJ agreed we need to limit our conversations to the IWDF and its management.</p> <p>JMcL stated that it is not just the management within the scope of the ToR but the operation of the IWDF as well. JMcL stated she agrees with PH and the IWDF was established to dispose of low-level radioactive waste and is being underutilised, disposal seems to be held up by the RCWA and if there is a way to progress this the CLC would like to see this. The CLC has requested since 2018 to have one disposal site for this waste. To benefit people of WA for future generations there should only be one site where radioactive waste is disposed, and this would allow a cost saving with respect to ongoing monitoring. JMcL stated that Finance has made a decision that we cannot talk about this or progress this and that she would like to hear Finance's justification as to why they have no plans to expand the facility.</p>	

ESJ responded to JMCL queries by referring to previous advice that the question has been proposed to the Government who advised there was no plan to expand the facility and furthermore, a compelling case has not been put forward to do so.

MC stated it is not a government department's role to lobby government to change the purpose of the IWDF. The role of the CLC is to monitor the management of the facility.

TR stated respectfully to the CLC and attendees that information is disseminated to the CLC and there are legislative bodies that determine the purpose of the waste facilities. In future if there are queries about why there are no disposals occurring at the site, this topic is not within the role of the group.

AK stated she does think it is a matter of concern for the group. Finance has advised no compelling reason has been presented to support a change in condition 7 of the Ministerial Statement 562. AK stated the CLC needs a compelling reason about why Finance won't put it forward as a change in condition and then we can discuss the pros and cons of Finance's justification. The community is asking us why we can't accept nation-wide waste when the facility next door can do it.

PH read from item 2 of the Terms of Reference and Operating Guidelines which allows community issues to be raised with the proponent and allow the community to have input into how the IWDF is operated and managed. PH reiterated his request that Finance talk to Tellus regarding a sensible and practical resolution to waste disposal.

LW stated he would like to take issue with MC that government agencies are not responsible for lobbying ministers for change. LW requested clarification regarding why the IWDF is being run by the Department of Finance who is staffed by people concerned with 'number crunching'. ESJ stated there have been a number of different proponents prior to the Government allocating responsibility to Finance. The division within Finance responsible for the IWDF is Buildings and Contracts who are responsible for building and managing non-residential buildings across the state; the staff within this division have a project and contract management skill set.

SW queried why Finance is the proponent and not a body like Development WA for example who may be better placed to push for the expansion of the facility. ESJ asked MS to outline the proponent history of the facility. MS explained the IWDF initially sat with the Department of Health (Health) as they were the first body to require a site to dispose their waste. After their waste was disposed, Health did not have capacity to continue to manage the facility. Government delegated responsibility to the DEP who eventually set up the body Waste Management WA to manage the IWDF along with the liquid waste treatment facility in Forrestfield. After Waste Management WA was dissolved and the site proponent was once again DEP a process was put in place and eventually the Government allocated responsibility for the site to Finance.

SW stated there is a case to be made for the development of this site and queried who is the body that makes the compelling case to expand the site. ESJ advised it is not a revenue generating operation, it is operated on a cost recovery model only. Waste owners are charged only what it costs to dispose the waste. SW queried why government is not concerned that Tellus can run at a profit. ESJ advised Tellus are a different business model. SW queried how is it possible for private industry to undertake disposals at a cheaper rate. ESJ stated she cannot comment on that. SW restated her question, who can make the case to expand the business? MC stated a

	<p>separate group would need to be developed to lobby the government. ESJ stated this topic has been the subject of the meetings for many years and the open avenues continue to be individuals lobbying government.</p> <p>JMcL believes this is the forum to lobby the case and it is because of the condition in the ministerial statement that the opportunity to expand cannot be considered. The only body that can make a change to this is the proponent and Finance has not provided a sufficient argument about why they cannot do this.</p> <p>MC called a point of order, stating there has been no community concern raised about what is happening at the IWDF.</p> <p>JMcL stated a change can be made under section 46. ESJ advised this is decided by the EPA. JMcL would like the issue to be referred to the appropriate body. ESJ reiterated what has been communicated previously, that is Finance has no intention of reviewing Ministerial Statement 562 with respect to condition 7. The reason is we have had no compelling case put to us. The question was put to government and has been answered.</p> <p>TR stated Finance has made their position very clear and asked the CLC how much evidence has been gathered to support the claims of the committee members wishing to expand the facility? TR stated that this evidence needs to be presented to Finance and suggested the CLC compile this evidence and put to the group.</p> <p>JMcL asked for more information about which body the matter can be progressed with to change Ministerial Statement 562 Condition 7. ESJ advised she has nothing more to add on the subject.</p>	
9.0	<p>General Business</p> <p>9.1 IWDF Handbook and brochure on wa.gov.au. (Intractable Waste Disposal Facility, Mt Walton East (IWDF) (www.wa.gov.au))</p> <p>ESJ advised the text included on the IWDF page on WA.gov.au was updated 4 May 2021.</p> <p>The following IWDF documents have been uploaded to the IWDF pages on WA.gov.au:</p> <ul style="list-style-type: none"> •IWDF Handbook (April 2021): updated to include the 2020NRT01 disposal and a new section describing the record keeping requirements for the IWDF. •The 2-page brochure <p>IWDF Waste Inventory spreadsheet has not yet been uploaded to the IWDF page, as feedback has not been received from RCWA regarding the information contained within the spreadsheet.</p> <p>AK asked whether a link could be included in the minutes. ESJ advised a link would be included in these minutes.</p> <p>9.2 Road Condition Report</p> <p>ESJ advised that ARC is preparing to undertake an upgrade to the level crossing to install flashing lights and boom gates. The current timeframe is preparation works late June and installing equipment mid-July. The Access Road, as assessed in April 2021, was in good condition and would be assessed again by the FMC in October 2021.</p>	

PH stated he has been informed by Sandy Ridge that they inspect the road daily. JMcl queried whether Finance could access information from Tellus about the condition of the road as IWDF are the primary users. ESJ advised the access road is important to the IWDF at the time of a disposal only, so in addition to inspecting the road twice a year, more thorough inspections are taken leading up to a disposal. Finance requires no further information with respect to the condition of the road for IWDF disposals.

TR asked whether there was something structured and in place for the management of the road condition reporting. ESJ confirmed Finance was responsible for the management of the road and this was separate to the management of the IWDF.

PN stated the subsuming of roads for private use that were once available to the public is making it more and more difficult for users to undertake legitimate use of crown land, such as the exploration and mining industry and the tourist industry. ESJ reaffirmed the interest in the road is in relation to a disposal at the facility.

LW queried who is responsible for transporting the waste. ESJ advised there are transport guidelines. LW queried about Tellus' transport guidelines and ESJ confirmed she could only comment on use of the road for IWDF purposes. ESJ stated the proponent has primary access to the road during a disposal. MS confirmed during the last disposal Tellus kept trucks off the road and were very helpful. Tellus have improved the road and in the past, we have had to grade the road prior to a disposal to ensure it was safe however this was not the case for the last disposal.

JMcl stated that the road was always discussed at CLC meetings until Finance became the proponent. Once a road use agreement was established the matter was no longer allowed to be discussed. ESJ stated she has provided an update on the road and discussion is outside the Terms of Reference and Operating Guidelines.

9.3 Contract Management of IWDF

ESJ advised Brendan Atkinson has accepted another job and will be replaced by Sze-Wan Ng who reports to EH. PH queried Sze-Wan's qualifications and MS stated that as a contract manager, qualifications like engineering were not required as this has been outsourced to the FMC, Aurora Environmental.

ESJ advised Finance personnel with responsibility for the IWDF will complete IWDF training.

JMcl requested a letter from the CLC be written to Brendan to thank him for his work, in particular his work on the database and in progressing work that has waned for many years. ESJ confirmed JMcl's comments would be captured in the minutes and shared with Brendan. ESJ confirmed Brendan's work on the database, record-keeping, and waste proforma's have made a significant improvement. MS confirmed ESJ and Brendan's work has been pivotal to the excellent result of the latest audit report.

JMcl stated Brendan had agreed that if aspects of the Road Use Agreement are modified for any reason that this would be reported to the CLC and asked if this would continue under the new manager? ESJ advised she would check the wording in the minutes and advise whether it can continue.

Confirm proponent's commitment to providing information about modification to the Road Use Agreement.

10.0	<p>Close / Scheduling of Next Meeting</p> <p>10.1 The meeting closed at 12:00.</p> <p>10.2 Next meeting:</p> <p>It was suggested that the next meeting be held Thursday 14 October 2021. TR advised this was when local government elections were being held and members would be absent. JMcl suggested having the meeting in September before the school holidays. MC stated he did not believe the local government elections would impact attendance in October. Yilgarn Council advised that at this stage they could not foresee any impact. ESJ advised October was suitable as it is post the FMC's monitoring of the site.</p> <p>NB thanked everyone for allowing him to sit in the meeting and listen.</p> <p>TR acknowledged the time and preparation ESJ puts into facilitating the meetings.</p> <p>JMcl asked whether meetings could resume being held at the Coolgardie Council?</p> <p>ESJ advised the current meeting venue was in place for COVID measures.</p> <p>ESJ asked Yilgarn Council if Teams worked well. PN stated the audio was not good and needs to be considered for future meetings. ESJ stated for next meeting the tables would be placed closed together so the speaker was closer to everyone and would sit in a position that was visible to members attending virtually.</p> <p>JMcl queried when the MRM minutes would be available. ESJ advised their release was imminent.</p> <p>JMcl requested a site visit. ESJ noted the request.</p>	
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