



Compliance Report

Remediation and Sale of Contaminated Former Australian Red Cross Hall located on the corner of Newdegate Street & Headfort Street, Greenslopes, (EPBC 2021/8997)

For period 13/2/23 – 12/2/24

1 Table of Contents

1	TABLE OF CONTENTS.....	2
2	INTRODUCTION	6
2.1	FILE LIST.....	6
2.2	SCHEDULE OF PLANS	7
3	SUMMARY OF CONDITIONS.....	8
4	DESCRIPTION OF ACTION	23
4.1	REMEDICATION.....	23
4.2	REPORTING PERIOD	24
5	SUPPORTING EVIDENCE.....	25
5.1	CONDITION 1.....	25
5.2	CONDITION 2.....	25
5.2.1	DELINEATION OF “ACTION AREA”	25
	FIGURE 1. AERIAL PHOTOGRAPH OF ACTION AREA PRIOR TO REMEDIATION.....	25
5.2.2	POST DEMOLITION	26
	FIGURE 2. AERIAL PHOTOGRAPH OF ACTION AREA POST REMEDIATION.....	26
5.3	CONDITION 3.....	26
	FIGURE 3. EMAIL FROM CATALYST ARCHITECTS WITH RECOMMENDED ARCHAEOLOGICAL FINDS PROTOCOL WORDING.....	27
	FIGURE 4. EMAIL FROM ENVIRO-PACIFIC SHOWING HERITAGE CURIO RECOVERED FROM WALL LINING. 29	
	FIGURE 5. RESPONSE FROM CEO OF EMAIL FROM ENVIRO-PACIFIC SHOWING HERITAGE CURIO RECOVERED FROM WALL LINING.....	30
	FIGURE 6. RESPONSE FROM CEO OF EMAIL FROM ENVIRO-PACIFIC SHOWING HERITAGE CURIO RECOVERED FROM WALL LINING.....	31
5.4	CONDITION 4.....	31
5.4.1	ENTRY PORTICO	32
5.4.2	ENTRY GATE.....	33
5.4.3	LEGACY HOUSE AND URBAN COMMONS INTERPRETIVE ELEMENTS	33
5.5	CONDITION 5.....	33
5.6	CONDITION 6.....	34
	FIGURE 7. EXTERNAL SCAFFOLD WITH 200UM PLASTIC SHEET RE-INSTATEMENT TO PROVIDE A SEMI-ENCAPSULATION FOR THE NON-FRIABLE ASBESTOS REMOVAL WORKS.....	34
	FIGURE 8. WALLS MARKED “A” FOR ASBESTOS OR “No” FOR KNOWN NON-ASBESTOS.....	35
	FIGURE 9. ACCOMMODATION BLOCK WITH BOTH LEVELS ENCAPSULATED WITH 200UM RATED PLASTIC TO ALL OPENINGS IN PREPARATION FOR BOTH FRIABLE AND NON-FRIABLE ASBESTOS REMOVAL. 35	
	FIGURE 10. NEGATIVE AIR PRESSURE EXHAUST VENT HORIZONTAL, SHOWING NEGATIVE PRESSURE ENVIRONMENT BEING MAINTAINED FOR ASBESTOS REMOVAL WORK TO ENSURE CONTAINMENT OF ASBESTOS.	36
	FIGURE 11. FRIABLE ASBESTOS REMOVAL.....	36
	FIGURE 12. ASBESTOS REMOVAL CREW MEMBERS READY TO RECEIVE DOUBLE WRAPPED ASBESTOS WASTE FOR CAREFUL PLACEMENT IN WASTE SKIP.....	37
	FIGURE 13. ENCLOSURE WITH SIGNAGE	38

FIGURE 14. LOCALISED EXCLUSION ZONE FOR THE PURPOSE OF LOADING OUT ASBESTOS WASTE INTO LINED SKIP.	39
FIGURE 15. EXCLUSION ZONES / BARRIERS IN PLACE WHILE ENCAPSULATED BUNDLES OF THE ASBESTOS WASTE BEING LOWERED FROM UPPER LEVEL FOR MANUAL LOADING INTO THE DOUBLE LINED WASTE BIN.	39
FIGURE 16. ASBESTOS WASTE LOAD OUT WITH BIN DOUBLE LINED AND AIRTIGHT.	40
5.7 CONDITION 7	40
5.8 CONDITION 8	40
5.9 CONDITION 9	41
5.10 CONDITION 10	41
FIGURE 17. CALENDAR OF AIR MONITORING DAYS	42
5.11 CONDITION 11	43
5.12 CONDITION 12	43
5.13 CONDITION 13	44
5.14 CONDITION 14	44
5.15 CONDITION 15	45
FIGURE 18. ASBESTOS WORKERS PREPARING THE REMOVED SHEETING INTO DOUBLE 200UM PLASTIC SHEET ENCAPSULATED PACKS FOR CRANING DOWN TO THE WASTE SKIP.	45
FIGURE 19. VARIOUS ENCAPSULATED PACKS READY FOR CRANAGE	46
FIGURE 20. DOUBLE-WRAPPED PACKS BEING CRANED DOWN INTO LINED ASBESTOS WASTE SKIP.	46
FIGURE 21. PVA SEALANT BEING APPLIED TO ACM SHEETING PRIOR TO HANDLING FOR LOAD OUT.	47
FIGURE 22. EWP (SCISSOR LIFT) BEING USED TO LOWER ACM SHEETING FOR TRANSFER TO WASTE SKIP	47
FIGURE 23. TRANSFER OF ACM SHEETING INTO DOUBLE-LINED SKIP UNDER DUST SUPPRESSION SPRAY.	48
FIGURE 24. HANDLING AND ENCAPSULATION OF ACM SHEETING.	49
FIGURE 25. DOUBLE WRAPPED BUNDLES OF ASBESTOS WASTE BEING CRANED DOWN IN SOFT SLINGS	50
FIGURE 26. CONTROLLED REMOVAL OF THE EXTERNAL TIMBER (ACM PAINT)	51
5.16 CONDITION 16	51
5.17 CONDITION 17	52
5.18 CONDITION 18	52
5.19 CONDITION 19	53
FIGURE 27. NOTIFICATION OF NON-COMPLIANCE WITH CONDITION 19	54
5.20 CONDITION 20	54
FIGURE 28. EMAIL FROM DEPARTMENT ACKNOWLEDGING SUBMISSION OF ENDORSED RAP	55
FIGURE 29. EMAIL TO DEPARTMENT SUBMITTING RAP	56
5.20.1 REQUIREMENTS OF THE RAP	56
FIGURE 30. GEOTEXTILE EMPLOYED FOR DUST SUPPRESSION	58
FIGURE 31. WATER SPRAY DUST SUPPRESSION OF SOIL BEING LOADED INTO SKIP.	58
FIGURE 32. WATER SUPPRESSION DURING MECHANICAL DEMOLITION	59
5.21 CONDITION 21	59
5.22 CONDITION 22	59
5.23 CONDITION 23	60
5.24 CONDITION 24	60

FIGURE 33. EMAIL FROM CLA ACKNOWLEDGING RECEIPT OF FULL CLID PACKAGE ...	61	
5.25 CONDITION 25	62	
5.26 CONDITION 26	62	
5.27 CONDITION 27	62	
FIGURE 34. EMAIL FROM BCC AGREEING TO IMAGES AND ACKNOWLEDGING RECEIPT	63	
5.28 CONDITION 28	64	
FIGURE 35. SIZE OF FULL ARCHIVAL PHOTOGRAPHIC RECORD	64	
FIGURE 36. EXAMPLES OF SIZE AND RESOLUTION OF INDIVIDUAL PHOTOGRAPHS	65	
5.29 CONDITION 29	65	
FIGURE 37. EMAIL FROM BCC ACKNOWLEDGING RECEIPT OF HERITAGE INTERPRETIVE STRATEGY	66	
5.30 CONDITION 30	66	
5.31 CONDITION 31	66	
5.32 CONDITION 32	67	
5.33 CONDITION 33	67	
FIGURE 38. NOTIFICATION OF NON-COMPLIANCE WITH CONDITION 33 OF THE APPROVAL		68
5.34 CONDITION 34	68	
5.35 CONDITION 35	69	
FIGURE 39. COMMENCEMENT OF ACTION NOTIFICATION	70	
FIGURE 40. EMAIL CLARIFYING REQUIREMENTS	71	
FIGURE 41. EXPLANATORY EMAIL CONFIRMING COMMENCEMENT OF ACTION	72	
5.36 CONDITION 36	72	
5.37 CONDITION 37	73	
5.38 CONDITION 38	73	
5.39 CONDITION 39	73	
5.40 CONDITION 40	74	
FIGURE 42. SCREEN SHOT OF THE "GREENSLOPES" CONTAINER SHOWING 2459 RELEVANT ELECTRONIC RECORDS	74	
5.41 CONDITION 41	75	
5.42 CONDITION 42	75	
5.43 CONDITION 43	75	
5.43.1 FORMAT	75	
5.43.2 CONTENT	77	
5.44 CONDITION 44	81	
5.45 CONDITION 45	82	
FIGURE 43. EMAIL GRANTING EXTENSION FOR PUBLICATION OF COMPLIANCE REPORT	83	
5.46 CONDITION 46	83	
5.47 CONDITION 47	83	
5.48 CONDITION 48	84	
5.49 CONDITION 49	84	
5.50 CONDITION 50	85	
5.51 CONDITION 51	85	
5.52 CONDITION 52	85	
5.53 CONDITION 53	85	
5.54 CONDITION 54	86	
6 DEFINITIONS	87	

7

DOCUMENT VERSION CONTROL

92

8

DECLARATION OF ACCURACY

93

2 Introduction

This report presents the evidence supporting compliance reporting for EPBC controlled action 2021/8997, Remediation and Sale of Contaminated Former Australian Red Cross Hall located on the corner of Newdegate Street & Headfort Street, Greenslopes for the period 3 February 2023 – 2 February 2024.

A summary of all conditions and their compliance status is in section 3 *Summary of Conditions* (p.8). The table in this section also includes a summary of the evidence with references to where the detailed evidence may be found.

In the cases in which evidence supporting a compliance condition is relatively straight forward, it is contained entirely in section 5 *Supporting Evidence* (p. 25). In the cases in which the evidence supporting a compliance condition is significant in volume, it is presented in attachments to this paper, but is summarized and references in section 5 *Supporting Evidence* (p. 25).

A note regarding Section 5 *Supporting Evidence* (p.25)

For some of the conditions that are currently “not applicable” there is no detailed evidence in section 5. However, a sub-section for each of the “not applicable” conditions is also included in order to:

- Maintain consistency throughout this compliance report
- Provide the structure for future reports
- Reduce confusion in cross-references (the sub-section numbers reflect the condition numbers) and
- Provide a logical sequence for presentation of evidence.

2.1 File List

The files included in this package are:

- Greenslopes – EPBC – Annual Compliance Report 2024
- Attachment 1 — Fencing and Signage
- Attachment 2 — Construction Environment Management Plan
- Attachment 3 — Heritage Interpretive Strategy (HIS)
- Attachment 4 — Asbestos Removal Control Plan
- Attachment 5 — Air Monitoring Report
- Attachment 6 — Demolition Management Plan
- Attachment 7 — Portico Measurements for Reconstruction
- Attachment 8 — Notification of Decision
- Attachment 9 — Architectural Preservation
- Attachment 10 — DRAFT Contaminated Land Investigation Document (CLID)
- Attachment 11 — Annual Compliance Report Guidelines
- Attachment 12 — Archival Photographic Record Report – low res
- Attachment 13 — RAP Endorsed by Land Auditor

- Attachment 14 – Remediation Action Plan
- Attachment 15 – Excavation Work code of practice
- Attachment 16 – Guide to providing maps and boundary data for EPBC projects
- Attachment 17 – example “toolbox talk”
- Attachment 18 – Quality Health Safety and Environment Plan
- Attachment 19 – Form 65 Notification of Licensed Asbestos work
- Attachment 20 – Letter drop to residents

2.2 Schedule of Plans

The following plans are part of the conditions of approval:

- Remediation Action Plan (see *5.20.1 Requirements of the RAP* (p.56))

3 Summary of Conditions

Table 1. SUMMARY OF CONDITIONS

#	Condition	Compliance	Evidence
1	<p>Prior to the commencement of the action, the approval holder must install Boundary fencing and Signage along the whole of the Action area perimeter prior to the commencement of the action.</p> <p>Once installed, the approval holder must ensure that the Boundary fencing is maintained for the remainder of the life of the approval, or until the completion of the sale of the property, whichever comes first.</p>	Not Applicable	<ul style="list-style-type: none"> • Boundary Fencing has been erected throughout the action (see <i>Attachment 1 – Fencing & Signage</i>, s5, pp.15-31). • Signage meeting the definition was present throughout the remediation of the site. Now that all remediation is complete the signage and bunting has been removed to reduce wind risk to the fencing. See <i>Attachment 1 – Fencing & Signage</i>, pp.2-13 for photographic evidence of signage. • Boundary Fencing remains in place post remediation (see <i>Attachment 1 – Fencing & Signage</i>, s5 <i>Fencing Invoices</i>, pp.14 – 31, and s6 <i>Post Remediation Fencing Photographs</i>, pp.32-34) • As this condition extends to the completion of the sale to BCC, compliance remains ongoing as at the conclusion of the reporting period. • BCC have agreed to take over the contract for the current fencing upon settlement (see <i>Attachment 1 – Fencing & Signage</i>, s7 <i>Brisbane City Council Agreement</i>, p. 35)
DEMOLITION STAGE			

2	The approval holder must not undertake any Demolition work outside of the Action area as part of this Action.	Compliant	<ul style="list-style-type: none"> Aerial photographs in section 5.2 Condition 2 (p.25) shows demolition was restricted to action area.
3	The approval holder must implement the Archaeological Finds Protocol during the demolition stage.	Compliant	<ul style="list-style-type: none"> See advice from heritage architect at section 5.2 Condition 3 (p.26). See Attachment 2 — <i>Construction Environment Management Plan</i>, section 5.8 <i>Cultural Heritage Protection & Unexpected Finds Management</i>, pp.17–18.
4	The approval holder must implement the Heritage Interpretative Strategy where is it relevant to this Action during the demolition stage.	Compliant	<ul style="list-style-type: none"> The Heritage Interpretive Strategy was implemented during the demolition phase. For heritage portico information see 5.4.1 Entry Portico p.32. For Heritage brick and ironwork gate preservation see 5.4.2 Entry Gate p.33 Additional heritage preservation was supported by the recovery of hardwood to be used in the new Legacy House and community park (see 5.4.3 Legacy House and Urban Commons Interpretive Elements p.33).
5	The approval holder must ensure that all Gate and brick facade structures of the main hall building of historical value within the Action area are retained for future re-installation.	Compliant	<ul style="list-style-type: none"> The brick and ironwork gate structure was preserved in situ (see 5.4.2 Entry Gate p.33) The brick façade portico was retained via careful documentation, deconstruction, and storage at a Brisbane City Council depot, ready for reconstruction as part of a community park. See 5.4.1 Entry Portico p.32.

			<ul style="list-style-type: none"> See <i>Attachment 7 – Portico Measurements for Reconstruction</i> for photographs showing accurate measurements of all aspects of the portico, facilitating reconstruction by BCC as an interpretive element in the new community park.
ASBESTOS REMOVAL			
6	<i>The approval holder must ensure that all Asbestos Containing Material is only removed in accordance with the How to Safely Remove Asbestos codes of practice.</i>	Compliant	<ul style="list-style-type: none"> See section 5.6 Condition 6 (p.34) All ACM removed according to <i>How to Safely Remove Asbestos code of practice</i> (Attachment 4 - <i>Asbestos Removal Control Plan</i> (ARCP)). Asbestos removal overseen by licensed asbestos assessors (See <i>Attachment 5 – Air Monitoring Report</i>, s3 Clearance Certificates – Asbestos, p. 1070).
7	<i>The approval holder must ensure that all Asbestos Containing Material is only managed in accordance with the How to Manage and Control Asbestos codes of practice.</i>	Compliant	<ul style="list-style-type: none"> Asbestos was removed in accordance with Enviro-Pacific's <i>Asbestos Removal Control Plan</i> (ARCP) (see Attachment 4). See Attachment 4 <i>Asbestos Removal Control Plan</i>, p. 33 for reference to <i>How to Manage and Control Asbestos codes of practice</i>. Asbestos removal was overseen by Coffey Tetrattech (See <i>Attachment 5 – Air Monitoring Report</i>, s3 Clearance Certificates – Asbestos, p. 1070). See section 5.7 Condition 7 (p.40)

8	<i>The approval holder must ensure that all demolition work, and removal or demolition of any vegetation or equipment containing Hazardous substances (including lead, pesticides, etc.), is only conducted in accordance with the Demolition work codes of practice.</i>	Compliant	<ul style="list-style-type: none"> Hazardous Substances were removed in accordance with <i>Attachment 6 – Demolition Management Plan, Hazardous Substances</i>, p.6. The Demolition Work code of practice is referenced on p.2 of the <i>Attachment 6 – Demolition Management Plan</i>. All removal of hazardous substances was overseen by Coffey Tetrach and <i>Attachment 5 – Air Monitoring Report, s4, p.1347</i> shows clearance certificates for lead removal demonstrating strict adherence to the code. See section 5.8 Condition 8 (p.40)
ASBESTOS AIR QUALITY MONITORING			
9	<i>The approval holder must ensure that all Air monitoring is conducted in accordance with the Membrane Filter Method Guidance Note</i>	Compliant	<ul style="list-style-type: none"> <i>Attachment 5 – Air Monitoring Report, s1, pp.2-215</i> show the daily analytical reports for asbestos air monitoring stating that Dust particulates were collected and filters examined in accordance with the <i>Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres NOHSC:3003 (2005)</i>. See section 5.9 Condition 9 (p.41)
10	<i>The approval holder must ensure that Air monitoring is undertaken during any removal of:</i> a) <i>friable Asbestos Containing Material, and</i> b) <i>more than 10m2 of bonded Asbestos Containing Material.</i>	Compliant	<ul style="list-style-type: none"> See section 5.10 Condition 10 (p.41) <i>Attachment 5 – Air Monitoring Report, s1, pp.2-215, and s3, pp. 1070 – 1346</i> provide comprehensive

			records of asbestos air testing and asbestos clearance certificates by Coffey Tetrattech.
11	<i>The approval holder must ensure that removal of Friable Asbestos Containing Material is only undertaken by Licensed asbestos assessor(s).</i>	Compliant	<ul style="list-style-type: none"> • See Attachment 4 <i>Asbestos Removal Control Plan</i>, s5.3, p. 14 to see certification and training requirements for all workers involved in asbestos removal. • <i>Attachment 8 – Quality, Health, Safety & Environment Plan</i>, s8.2.5, p.46 outlines asbestos removal licensing for all workers. • All asbestos removal work was undertaken by licensed asbestos assessors (See <i>Section 5.11 Condition 11</i> (p.43) for details of licenses. • See Attachment 19 – Form 65 Notification of licensed asbestos work
12	<i>The approval holder must ensure that air quality within the Action area does not exceed the asbestos exposure standard.</i>	Compliant	<ul style="list-style-type: none"> • <i>Attachment 5 – Air Monitoring Report</i>, s1, pp.2-215, provide comprehensive records of asbestos air testing showing all tests <i>returned</i> results below the detectable limits. • See Section 5.12 <i>Condition 12</i> (p.43)
13	<i>If Air monitoring detects exposure levels exceeding 0.02 fibres/ml, within 2 business days of the exceedance being detected, the approval holder must:</i> <i>a) notify the Department in writing, and</i> <i>b) submit, to the Department, a Remediation Plan detailing measures to:</i>	Not Applicable	<ul style="list-style-type: none"> • No air monitoring <i>detected</i> levels exceeding 0.02fibre/mL. • See section 5.13 <i>Condition 13</i> (p.44)

	<p>i) <i>remediate the exceedance,</i></p> <p>ii) <i>minimise impact to the environment and human health, and</i></p> <p>iii) <i>avoid future exceedances of the Asbestos exposure standard within the Action area.</i></p>		
14	<i>The approval holder must submit all Air Monitoring data to the Department within five days of the completion of the Demolition work and within five days of the completion of the remediation and validation work.</i>	Not Applicable	<ul style="list-style-type: none"> • Remediation not <i>complete</i> as at reporting date. • See section 5.14 <i>Condition 14</i> (p.44) •
TRANSPORT AND HANDLING OF MATERIAL CONTAINING ASBESTOS AND HAZARDOUS SUBSTANCES			
15	<i>The approval holder must ensure that all transport of all Asbestos Containing Material and hazardous material is only undertaken in accordance with ERA 57.</i>	Compliant	<ul style="list-style-type: none"> • All ACM and hazardous material was transported in accordance with ERA57. • See section 5.15 <i>Condition 15</i> (P.45)
16	<i>The approval holder must ensure that all Asbestos Containing Materials and Hazardous substances are only handled in accordance with the Environmental Protection Regulation 2019 (Qld).</i>	Compliant	<ul style="list-style-type: none"> • Attachment 4 – Asbestos Removal Control Plan covers the handling of asbestos and other hazardous materials • See section 5.16 <i>Condition 16</i> (p.51) for details
<ul style="list-style-type: none"> • DISPOSAL OF MATERIAL CONTAINING ASBESTOS AND HAZARDOUS SUBSTANCES 			
17	<i>The approval holder must ensure that all Asbestos Containing Material and hazardous materials are only disposed of in accordance with the How to Safely Remove Asbestos codes of practice.</i>	Compliant	<ul style="list-style-type: none"> • All works conducted in accordance with See section 5.17 <i>Condition 17</i> (p.52)
18	<i>The approval holder must ensure that removal of Asbestos Containing Material is only undertaken by Licensed asbestos assessor(s).</i>	Compliant	<ul style="list-style-type: none"> • See Attachment 4 <i>Asbestos Removal Control Plan</i>, s5.3, p. 14 to see certification and training

			<p>requirements for all workers involved in asbestos removal.</p> <ul style="list-style-type: none"> • <i>Attachment 8 – Quality, Health, Safety & Environment Plan, s8.2.5, p.46</i> outlines asbestos removal licensing for all workers. • All asbestos removal work was undertaken by licensed asbestos assessors () for details of licenses. See section 5.18 Condition 18 (p.52) • See Attachment 19 – Form 65 Notification of licensed asbestos work
19	<p>The approval holder must record all Regulated waste tracking information. The approval holder must submit Regulated waste tracking information records to the Department within 10 business days of the Regulated waste being disposed at a Queensland government approved asbestos disposal facility.</p>	Non-Compliant	<ul style="list-style-type: none"> • Records not submitted within 10 days. • See section 5.19 Condition 19 (p.53)
REMEDIATION AND VALIDATION PHASE			
20	<p>The approval holder must prepare a Remediation Action Plan (RAP) to manage environmental and public safety throughout the action. The RAP must detail Remediation and validation works to be undertaken within the Action area. The RAP must be reviewed and endorsed by an Independent contaminated land auditor. The approval holder must submit the endorsed RAP to the Department within 10 business days of the RAP being endorsed by the Independent contaminated land auditor. The approval holder must implement the endorsed RAP for the Remediation and validation phase.</p>	Compliant	<ul style="list-style-type: none"> • The RAP was reviewed and endorsed by an independent contaminated land auditor (see Attachment 13) • RAP was submitted to Department within the nominated timeframe (see section 5.20 Condition 20 (p.54) • Full RAP as submitted at Attachment 14

21	<i>The approval holder must ensure all Excavation work is undertaken in accordance with the Excavation work codes of practice.</i>	Not Applicable	<ul style="list-style-type: none"> No excavation conducted meeting the definition in the code of practice See section 5.21 Condition 21 (p.59)
22	<i>The approval holder must ensure that all imported fill is free of hazardous material contamination and is suitable for all future land uses.</i>	Compliant	<ul style="list-style-type: none"> All imported material sourced from certified Virgin Excavated Natural Material (VENM). See section 5.22 Condition 22 (p.59)
23	<i>The approval holder must not sell the Action area until all Remediation and validation works specified in the endorsed RAP are completed.</i>	Not-Applicable	<ul style="list-style-type: none"> Not applicable at the end of the reporting period. See section 5.23 Condition 23 (p.60)
24	<p><i>Prior to the sale of the Action area, the approval holder must engage:</i></p> <p><i>a) a Suitably qualified person to prepare a Site Suitability Statement which evaluates the suitability of the Action area for all potential future land uses, and</i></p> <p><i>b) an Independent Contaminated Land Auditor to evaluate the contaminated land investigation documentation, and the Site Suitability Statement against the requirements of 389(1) and 392(2) of the Environmental Protection Act 1994 (Qld).</i></p> <p><i>Note: the Suitably qualified person and the Independent Contaminated Land Auditor cannot be the same person.</i></p>	Compliant	<ul style="list-style-type: none"> A suitably qualified person was engaged (Jeremy Wicks of Coffey Tetrattech) to prepare a CLID and site suitability statement. An independent contaminated land auditor (Louise Cartwright of Epic Environmental) was engaged to evaluate the CLID See section 5.24 Condition 24 (p.60) See Attachment 10 for CLID.
25	<i>The approval holder must submit the Contaminated land investigation documentation and the Site Suitability Statement to the Department within 15 business days of the date the approval holder receives the Independent contaminated land auditor's evaluation of the Contaminated land investigation documentation and the Site Suitability Statement.</i>	Not-Applicable	<ul style="list-style-type: none"> Not applicable at the end of the reporting period. Contaminated Land Auditors evaluation of the CLID expected May-June 2024 See section 5.25 Condition 2562

SALE OF LAND			
26	<i>Prior to the sale of the Action area, the approval holder must submit written evidence to the Department demonstrating suitability of the Action area for all future land uses, and that the Action area has been removed from the Environmental Management and Contaminated Land registers under the Queensland Environmental Protection Act 1994 (Qld).</i>	Not-Applicable	<ul style="list-style-type: none"> Action Area has not been sold as at the end of the reporting period See section 5.26 <i>Condition 26</i> p.62
27	<i>Prior to the sale of the Action area, the approval holder must provide an agreed selection of images contained within the Heritage Impact Assessment, to the purchaser. Both parties engaged in the sale of the Action area must agree to the images provided.</i>	Compliant	<ul style="list-style-type: none"> Agreed selection of images has been provided to BCC See section 5.27 <i>Condition 27</i> (p.62)
28	<i>Historical images provided to the purchaser of the Action area must be of sufficient quality to be reproducible in A4 size.</i>	Compliant	<ul style="list-style-type: none"> Images provided are of very high resolution, suitable for high quality prints of sizes much larger than A4. 845 files totaling 6.5GB See section 5.28 <i>Condition 28</i> (p.64)
29	<i>Prior to the sale of the Action area, the approval holder must provide a copy of the Heritage Interpretative Strategy to the purchaser for reference to assist in the preservation of historical values at the site as part of future land use.</i>	Compliant	<ul style="list-style-type: none"> HIS has been provided to BCC See section 5.29 <i>Condition 29</i> (p.65)
30	<i>If the Action area is sold, the approval holder must notify the Department in writing of the completion of the sale of the Action area and provide the Department with a copy of the deed of ownership within 30 business days of the settlement date.</i>	Not Applicable	<ul style="list-style-type: none"> Sale not complete as at the end of the reporting period See Section 5.30 <i>Condition 30</i> (p.66)
31	<i>If the approval holder has not sold the Action area within 15 years from the date of this approval, then the approval holder must not</i>	Not Applicable	<ul style="list-style-type: none"> Not applicable until 3 February 2038 See section 5.31 <i>Condition 31</i> (p.66)

	sell the Action area without the prior written agreement of the Minister .		
SUBMISSION AND PUBLICATION OF PLANS			
32	The approval holder must submit all Plans and reports required by these conditions electronically to the Department .	Compliant	<ul style="list-style-type: none"> Plans submitted electronically (see Figure 29 on p.56) See section 5.32 <i>Condition 32</i> (p.67)
33	<p>Unless otherwise agreed to in writing by the Minister, the approval holder must publish each Plan on their Website within 15 business days of the date:</p> <p>a) of this approval, if the version of the Plan to be implemented is specified in these conditions, or</p> <p>b) the Plan is submitted to the Department in accordance with a requirement of these conditions, if the Plan does not require the approval of the Minister.</p>	Non-Compliant	<ul style="list-style-type: none"> Wrong version of plan available on website Non-compliance rectified and reported immediately on 14 May 2024 See section 5.33 <i>Condition 33</i> (p.67)
34	The approval holder must keep all published Plans required by these conditions on their Website until the expiry date of this approval.	Compliant	<ul style="list-style-type: none"> Plan published remains published on website See section 5.34 <i>Condition 34</i> (p.68)
NOTIFICATION OF DATE OF COMMENCEMENT OF THE ACTION			
35	The approval holder must notify the Department electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.	Compliant	<ul style="list-style-type: none"> See section 5.35 - <i>Condition 35</i> (p.69) for email exchange notifying the Department of the commencement of the action.
36	If the Commencement of the Action does not occur within 5 years from the date of this approval, then the approval holder must not Commence the Action without the prior written agreement of the Minister .	Not Applicable	<ul style="list-style-type: none"> Action commenced within 5 years from date of approval See section 5.36 <i>Condition 36</i> (p.72)

COMPLIANCE RECORDS			
37	<i>The approval holder must maintain accurate and complete compliance records.</i>	Compliant	All compliance records stored in DVA's records management system, <i>HPE Content Manager</i> . See section 5.37 Condition 37 (p.73)
38	<i>If the Department makes a request in writing, the approval holder must provide electronic copies of Compliance records to the Department within the timeframe specified in the request. Note: Compliance records may be subject to audit by the Department, or by an Independent auditor in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the Department's Website or through the general media.</i>	Not Applicable	<ul style="list-style-type: none"> No request made for compliance records as at reporting date. See section 5.38 Condition 38 (p.73)
39	<i>The approval holder must ensure that any Monitoring data, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the Department's Guide to providing maps and boundary data for EPBC Act projects (2021), or as otherwise specified by the Minister in writing.</i>	Compliant	<ul style="list-style-type: none"> Maps are consistent with the Guide See section 5.39 Condition 39 (p.73)
40	<i>The approval holder must retain all Monitoring data, surveys, maps, other spatial and metadata, electronically.</i>	Compliant	<ul style="list-style-type: none"> All records are stored in DVA's records management system, <i>HPE Content Manager</i>. See section 5.40 Condition 40 (p.74)
41	<i>The approval holder must submit electronically to the Department all requested Monitoring data, surveys, maps, other spatial and metadata, within 14 business days of the date of request.</i>	Not Applicable	<ul style="list-style-type: none"> No requests made in the reporting period See section 5.41 Condition 41 (p.75)

42	<i>The approval holder must prepare a Compliance report for each 12-month period following the date of this approval, until the completion of the action, or as otherwise agreed to in writing by the Minister.</i>	Compliant	<ul style="list-style-type: none"> This document is the first compliance report covering the period 3 Feb 2023 – 2 Feb 2024. See section 5.42 <i>Condition 42</i> (p.75)
ANNUAL COMPLIANCE REPORTING			
43	<i>Each Compliance report must be consistent with the Department's Annual Compliance report Guidelines (2014).</i>	Compliant	<p>MED</p> <p>See section 5.43 <i>Condition 43</i> (p.75)</p>
44	<p><i>Each Compliance report must include:</i></p> <p><i>a) Accurate and complete details of compliance and any non-compliance with the conditions and the Plans, and any Incidents.</i></p> <p><i>b) A schedule of all Plans in existence in relation to these conditions and accurate and complete details of how each Plan is being implemented.</i></p>	Compliant	<ul style="list-style-type: none"> Details of compliance with conditions is in Section 5 <i>Supporting Evidence</i> (p.25) See section 5.44 <i>Condition 44</i> (p.81)
45	<p><i>The approval holder must:</i></p> <p><i>a) Publish each Compliance report on the Website within 60 business days following the end of the 12-month period for which that Compliance report is required.</i></p> <p><i>b) Notify the Department electronically, within 5 business days of the date of publication that a Compliance report has been published on the Website.</i></p> <p><i>c) Provide the weblink for the Compliance report in the notification to the Department.</i></p> <p><i>d) Keep all published compliance reports required by these conditions on the Website until the expiry date of this approval or completion of the action, whichever is first.</i></p> <p><i>Note: Compliance reports may be published on the Department's Website.</i></p>	Compliant	<ul style="list-style-type: none"> Greenslopes Remediation Department of Veterans' Affairs (dva.gov.au) See section 5.45 <i>Condition 45</i> (p.82)

REPORTING NON-COMPLIANCE			
46	<i>The approval holder must notify the Department electronically, within 2 business days of becoming aware of any Incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a Plan.</i>	Compliant	<ul style="list-style-type: none"> • See section 5.46 Condition 46 (p.83) • See section 5.19 Condition 19 (p.53) and section 5.33 Condition 33 (p.67) for details of non-compliance.
47	<p><i>The approval holder must specify in the notification:</i></p> <p><i>a) Any condition or commitment made in a Plan which has been or may have been breached.</i></p> <p><i>b) A short description of the Incident and/or potential non-compliance and/or actual non-compliance.</i></p> <p><i>c) The location (including co-ordinates), date, and time of the Incident and/or potential non-compliance and/or actual non-compliance.</i></p> <p><i>Note: If the exact information cannot be provided, the approval holder must provide the best information available</i></p>	Compliant	<ul style="list-style-type: none"> • Non-compliance was restricted to administrative issues rather than environmental issues • See section 5.47 Condition 47 (p.83)
48	<p><i>The approval holder must provide to the Department in writing, within 12 business days of becoming aware of any Incident and/or potential non-compliance and/or actual non-compliance, the details of that Incident and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a Plan. The approval holder must specify:</i></p> <p><i>a) Any corrective action or investigation which the approval holder has already taken</i></p> <p><i>b) The potential impacts of the Incident and/or non-compliance and/or non-compliance</i></p> <p><i>c) The method and timing of any corrective action that will be undertaken by the approval holder.</i></p>	Compliant	See section 5.48 Condition 48 (p.84)

INDEPENDENT AUDIT			
49	<i>The approval holder must ensure that an Independent audit of compliance with the conditions is conducted for every five-year period following the Commencement of the Action until this approval expires, unless otherwise specified in writing by the Minister.</i>	Not Applicable	<ul style="list-style-type: none"> Not yet due See Section 5.49 <i>Condition 49</i> (p.84)
50	<p>For each Independent audit, the approval holder must:</p> <p>a) Provide the name and qualifications of the nominated Independent auditor, the draft audit criteria, and proposed timeframe for submitting the Audit report to the Department prior to commencing the Independent audit.</p> <p>b) Only commence the Independent audit once the nominated Independent auditor, audit criteria and timeframe for submitting the Audit report have been approved in writing by the Department.</p> <p>c) Submit the Audit report to the Department for approval within the timeframe specified and approved in writing by the Department.</p> <p>d) Publish each Audit report on the Website within 15 business days of the date of the Department's approval of the audit report.</p> <p>e) Keep every Audit report published on the Website until this approval expires.</p>	Not Applicable	<ul style="list-style-type: none"> Not yet due See section 5.50 <i>Condition 50</i> (p.85)
51	<i>Each Audit report must report for the five-year period preceding that audit report.</i>	Not Applicable	<ul style="list-style-type: none"> Not yet due See section 0 <i>Not Applicable</i> <p>Commencement of the action was on 13 February 2023, therefore the first independent audit report is for the period 13 February 2023 – 12 February 2028.</p> <ul style="list-style-type: none"> Condition 51 (p.85)

52	<i>Each Audit report must be completed to the satisfaction of the Minister and be consistent with the Department's Environment Protection and Biodiversity Conservation Act 1999 Independent audit and Audit report Guidelines (2019).</i>	Not Applicable	<ul style="list-style-type: none"> • Not yet due • See section 0 <i>Not Applicable</i> <p>Commencement of the action was on 13 February 2023, therefore the first independent audit report is for the period 13 February 2023 – 12 February 2028.</p> <ul style="list-style-type: none"> • Condition 52 (p.85)
COMPLETION OF THE ACTION			
53	<i>The approval holder must notify the Department electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.</i>	Not Applicable	<ul style="list-style-type: none"> • Approval did not expire during reporting period. • See section 0 <i>Not Applicable</i> <p>Commencement of the action was on 13 February 2023, therefore the first independent audit report is for the period 13 February 2023 – 12 February 2028.</p> <ul style="list-style-type: none"> • Condition 53 (p.85)
54	<i>Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the Department electronically of the date of Completion of the Action and provide completion data.</i>	Not Applicable	<ul style="list-style-type: none"> • Action not completed during reporting period. • See section 5.54 <i>Condition 54</i> (p.86)

4 Description of Action

The **Department** of Veterans' Affairs (Repatriation Commission) owns Lots 123, 124, and 125 on the corner of Newdegate and Headfort Streets Greenslopes (Greenslopes property) opposite the Greenslopes Private Hospital in Brisbane. On the land were two buildings built by the Australian Red Cross in 1946. The buildings incorporated significant amounts of hazardous material and the land was heavily contaminated.

DVA's proposed action was to:

1. remove all hazardous materials from the buildings (roof, ceilings, internal walls, some external walls, wall battens, etc.)
2. demolish the remnants of the buildings recovering salvageable hardwood for potential re-use in structures built on the remediated site.
3. remove contaminated soil from the site.
4. sell the site to the Brisbane City Council for the purpose of public parkland and the provision of land to Legacy Queensland for the construction of a new state headquarters to improve services to the veteran community.

There were two principal objectives of the proposed action:

1. Environmental Clean-up - By removing the buildings including the extensive hazardous material, DVA will eliminate the risk that hazardous materials will escape the site. Likewise the removal of the contaminated soil to encapsulated landfill will remove contamination from the site, reducing the risk of contaminants such as organochlorine pesticides or heavy metals escaping the site.
2. Return the Site to Community Use - By selling the site to the BCC with contractually defined usage conditions, DVA will ensure that the site is returned to the community for use as a community asset as a community park with the option to sell a portion of the land to Legacy Queensland for their new state headquarters, delivering services to veterans and their families from the site.

4.1 Remediation

The buildings on the site were constructed with significant amounts of hazardous material. Asbestos was used in the roofing, ceilings, internal walls, wall battens, some external walls, flooring, wet areas and other seals. Lead based paint has also been used. The soil is contaminated with organochlorine pesticides and zinc, as well as ACM from the buildings as they have degraded over time.

Remediation has involved a number of steps:

1. Removal of Removal of hazardous materials (mostly asbestos) from the extant buildings and collection of exposed ACM on the ground surface.
2. Deconstruction of the buildings to salvage reusable building materials – particularly hardwood
3. General demolition of the remaining structures noting that some architectural elements, such as the period brick gates and the pedimented brickwork fascia of the main hall, will be retained for incorporation in a future park by Brisbane City Council.

4. Removal of approximately 1400 tons of contaminated soil for proper disposal.
5. Testing to determine whether the site is free from contaminants and hazardous materials and further remediation conducted with the aim of removing the site from the Environmental Land Register.

4.2 Reporting Period

During the reporting period the demolition and soil remediation were undertaken. Validation testing and evaluation is still underway leaving open the possibility that additional remediation will be required.

5 Supporting Evidence

This section provides evidence to support the claims made in section 3

5.1 Condition 1

*Prior to the commencement of the action, the approval holder must install **Boundary fencing and Signage** along the whole of the **Action area** perimeter prior to the commencement of the action. Once installed, the approval holder must ensure that the **Boundary fencing** is maintained for the remainder of the life of the approval, or until the completion of the sale of the property, whichever comes first.*

See *Attachment 1 Fencing and Signage*.

5.2 Condition 2

*The approval holder must not undertake any **Demolition work** outside of the **Action area** as part of this Action.*

5.2.1 Delineation of “Action Area”

The former Australian Red Cross Centre is located on the corner of Newdegate Street & Headfort Street (Lot 123, 124 & 125 of RP46047), Greenslopes, Brisbane. Parish of Bulimba, County of Stanley, now part of Brisbane City Council’s LGA. Total land area is 1934m² (0.1934 hectares).

The diagram below shows the boundary of the lots (the **action area**).

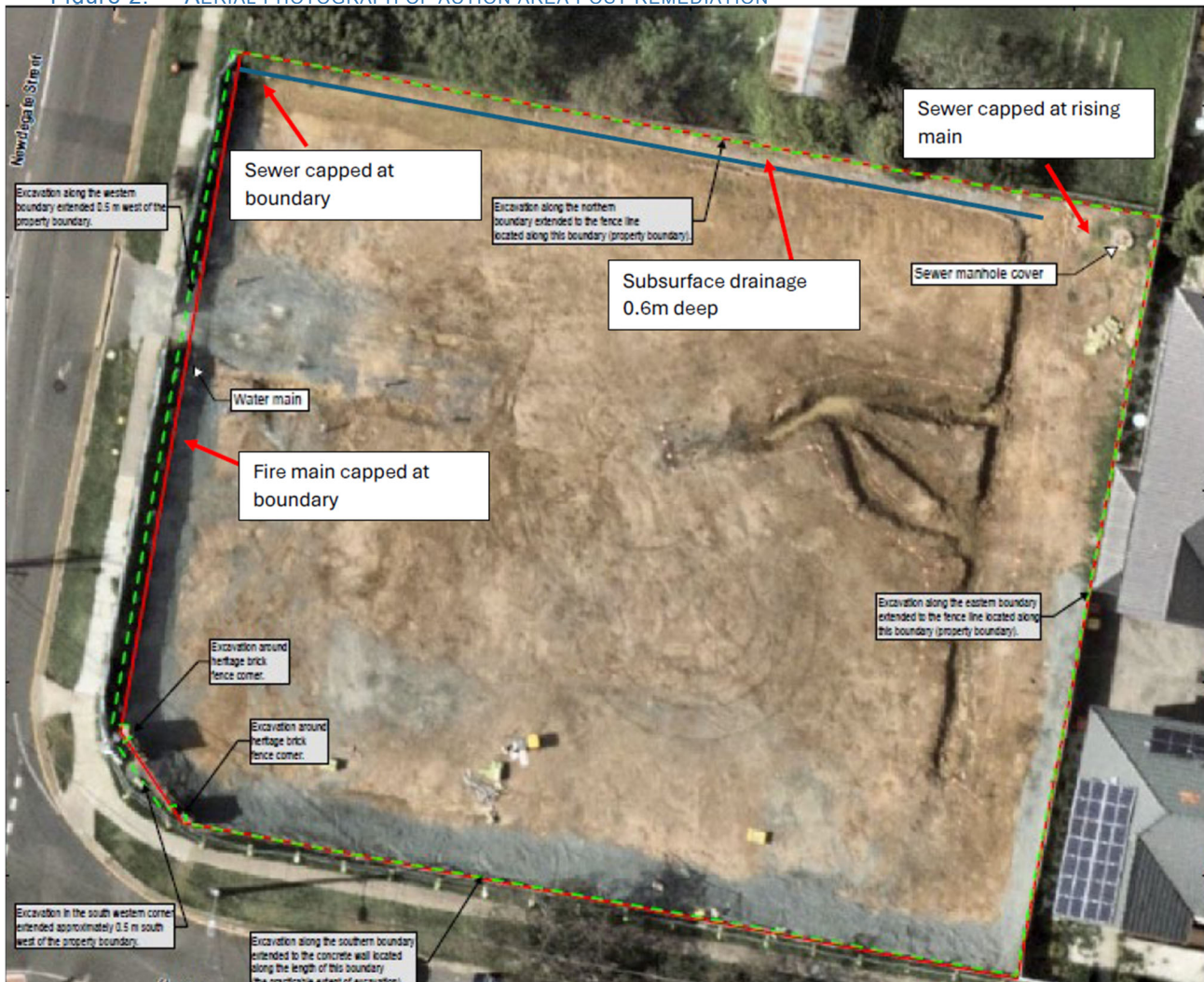
Figure 1. AERIAL PHOTOGRAPH OF ACTION AREA PRIOR TO REMEDIATION



5.2.2 Post Demolition

The following aerial photograph shows the action area as it is now, with demolition clearly restricted to within the action area.

Figure 2. AERIAL PHOTOGRAPH OF ACTION AREA POST REMEDIATION

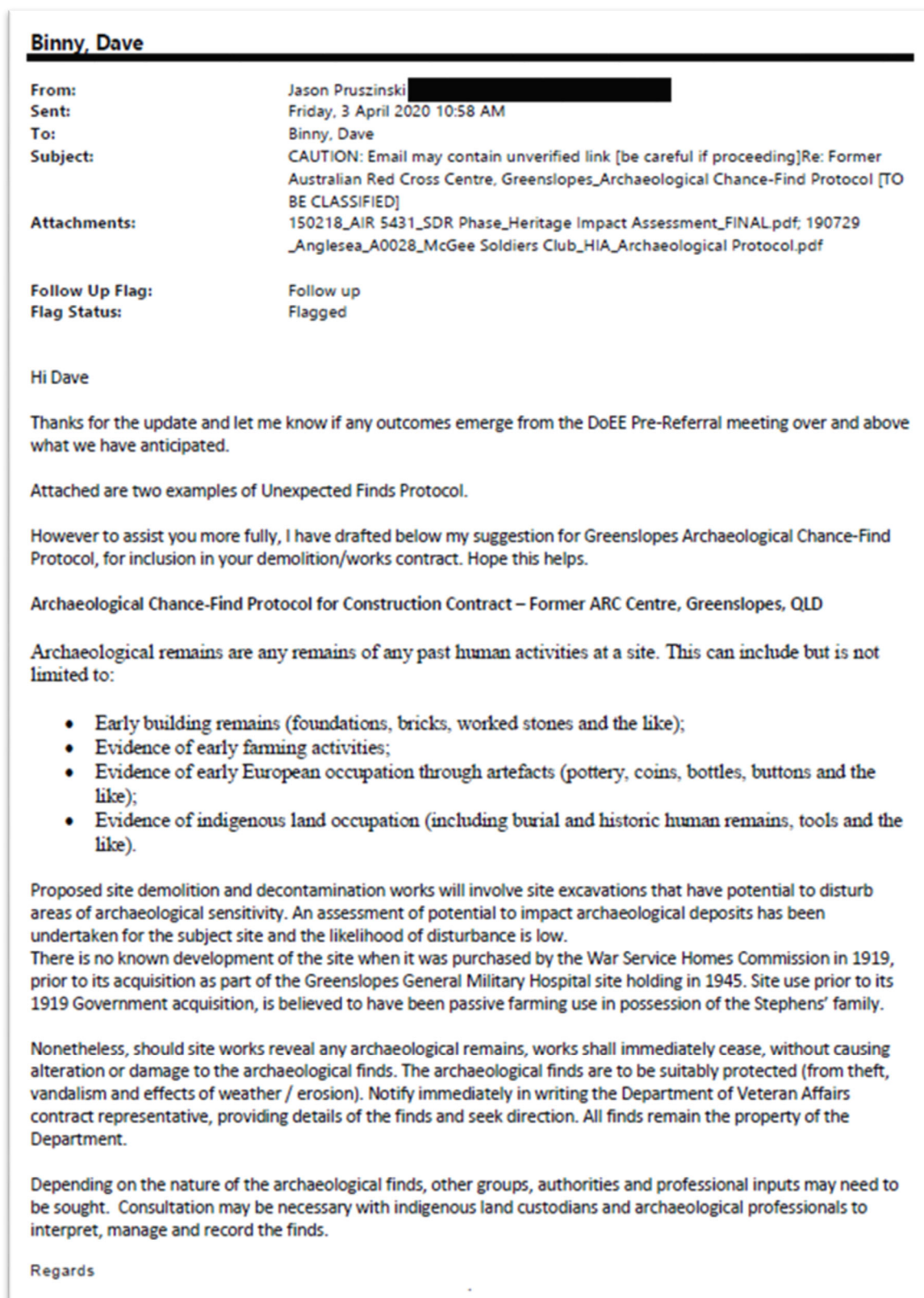


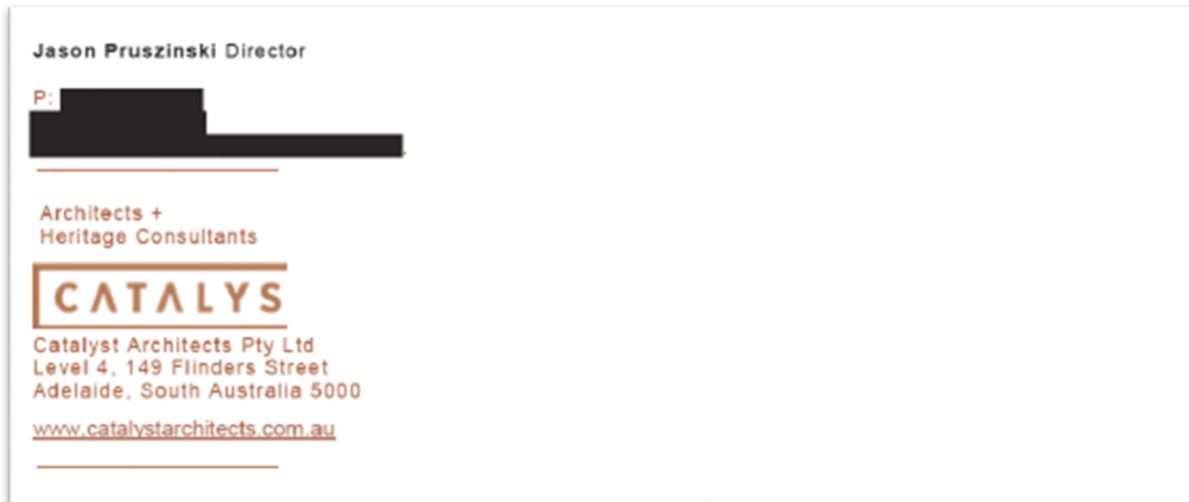
5.3 Condition 3

*The approval holder must implement the **Archaeological Finds Protocol** during the demolition stage.*

DVA engaged a specialist heritage architect, Jason Pruzinski of Catalyst Architects, to advise on all heritage matters including the wording of the *Archaeological Finds Protocol*. The email below is his recommendation for wording of the *Archaeological Finds Protocol*.

Figure 3. EMAIL FROM CATALYST ARCHITECTS WITH RECOMMENDED ARCHAEOLOGICAL FINDS PROTOCOL WORDING.





This wording was included in full in Enviro-Pacific's Construction Environment Management Plan (CEMP)(Attachment 2, section 5.8, pp.17—18). Enviro-Pacific worked to the CEMP throughout the entirety of the demolition and remediation works.

No archaeological finds were discovered.

However, while demolition of the main hall was being undertaken a, some of the lining material of the main hall projection room had an interesting branding stencilled on the reverse. The galvanised tin sheet was stencilled with the makers mark "Queens Head War Finish" as seen in the emails below. While not an archaeological find *per se*, it was of sufficient interest to warrant consideration.

Being of some minor heritage interest, the material was offered to both the BCC and Legacy Brisbane as a heritage curio for integration into future construction on the site. Legacy Brisbane expressed a keen interest in having the items for inclusion in the new Legacy House.

The following three emails show the progression of this interest: The first email is from the Remediation company. The second is an email from the CEO of Legacy Brisbane expressing interest in incorporating the find into the new Legacy House. The third is from the Legacy House architects confirming their interest in incorporating it into the design.

Figure 4. EMAIL FROM ENVIRO-PACIFIC SHOWING HERITAGE CURIO RECOVERED FROM WALL LINING.

From: Mick Merriman [REDACTED]
Sent: Monday, 20 March 2023 12:41 PM
To: Binny, Dave [REDACTED]
Subject: Heritage value - DVA

Morning Dave,

Have a look at the below image; this is the backing of the galvanised tin sheeting used for sound proofing in the old Main Hall projector room. The average sheeting is 600mm x 900mm and we have managed to get a few off with minimal damage. Do you think that the DVA would be interested in their Heritage value, if any? They are a Lysaght metal product.



Mick Merriman
Project Manager



Figure 5. RESPONSE FROM CEO OF EMAIL FROM ENVIRO-PACIFIC SHOWING HERITAGE CURIO RECOVERED FROM WALL LINING.

Sent: Tuesday, March 21, 2023 9:14 AM
To: Binny, Dave [REDACTED]; Annette Magee [REDACTED]
Cc: Mick Merriman [REDACTED]; Graham Legerton [REDACTED]; David McGuire [REDACTED]; Paul Smith [REDACTED]
Subject: RE: Heritage value - DVA [SEC=UNOFFICIAL]

Message received from external source. Exercise caution when opening attachments, clicking links, or exchanging information
Wow...yes! Will be very interested to do some research on this. Perhaps something we can incorporate to our build or at least have on display in our Legacy Memorial on the top floor.

Regards,

Please support my **Run Army** campaign and donate via - [Legacy Brisbane](#) | [Run Army 2023](#) | [Brendan Cox](#)

Brendan Cox

Chief Executive Officer

Legacy Brisbane | 41 Merivale St, South Brisbane, 4101 | PO Box 3003, South Brisbane, 4101

[REDACTED] | www.legacy.com.au | www.facebook.com/LegacyAustralia

Share in our 'Legacy of Care' - to donate call 1800 534 229 or visit www.legacy.com.au

Paul Tys Churchill Fellowship recipient: [Brendan Cox](#)

Member Queensland Government Veterans Reference Group



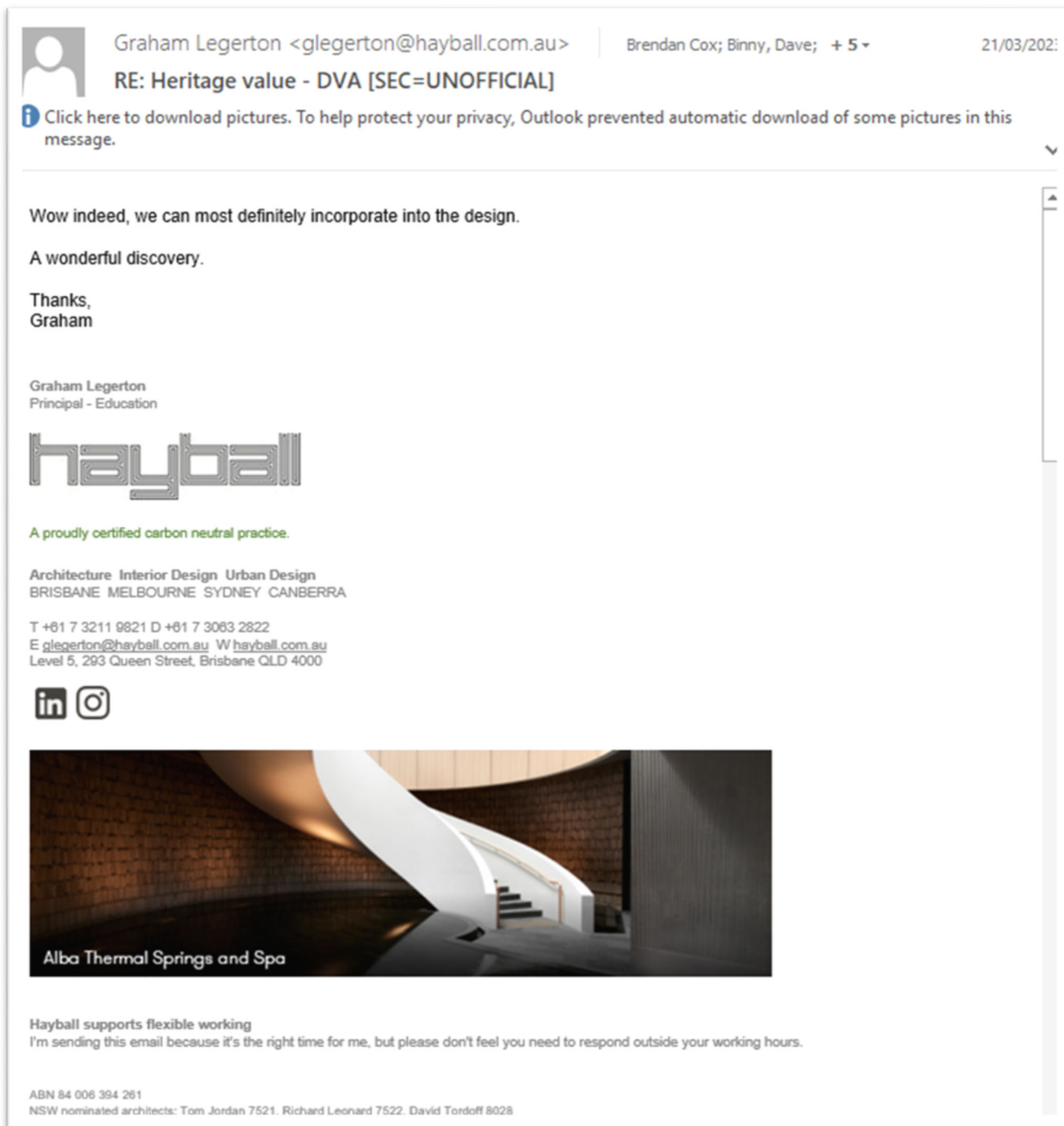
Caring for the families of those who served their country

Share in our 'Legacy of Care' - to donate call 1800 534 229

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Figure 6. RESPONSE FROM CEO OF EMAIL FROM ENVIRO-PACIFIC SHOWING HERITAGE CURIO RECOVERED FROM WALL LINING.



5.4 Condition 4

*The approval holder must implement the **Heritage Interpretative Strategy** where is it relevant to this Action during the demolition stage.*

5.4.1 Entry Portico

The Heritage Interpretive Strategy recommendation 1 states:

Retain original brick entrance portico from former Greenslopes ARC Centre Recreation Hall (c.1946). Includes adaptively reusing this original built element in situ, with it forming the basis for a new community park shelter structure, that is to incorporate interpretive content. Undertake conservation works to the existing portico structure, including reconstruction of missing bronze lettering “AUSTRALIAN RED CROSS CENTRE” and reconstruction of the missing building plaque.

DVA took responsibility for the retention of the original brick entrance portico during the demolition of the Main Hall. However, as the demolition progressed it became increasingly clear that retention of the portico *in situ* was both risky and unlikely to be successful without construction of a steel reinforcing framework that itself would prevent the full remediation of the land.

The heritage architect was approached for advice on alternative heritage preservation of the portico. His response is shown in full in Attachment 9 – Architectural Preservation, figure 1, p.3. The architect confirmed that it was an expected problem and that dismantling the portico in a way that allowed it to be reassembled would meet the requirements of the recommendation in the Heritage Interpretive Strategy, noting that the portico would be an interpretive heritage element of a future park feature.

Figure 2 of Attachment 9 shows Enviro-Pacific’s acknowledgement of the adjustment to the plan for the portico.

The Brisbane City Council was also asked to advise on whether they believed dismantling and reassembly would be acceptable to them and their agreement (expressing a preference for this approach) is seen in figure 3 of Attachment 9.

Figure 4 of Attachment 9 shows an email from Catalyst Architects showing more detailed instructions on the deconstruction of the portico and figure 4 of Attachment 9 shows a series of emails in which DVA, Enviro-Pacific, and Catalyst Architects are collaborating to ensure a positive outcome for the portico preservation. In addition to the portico bricks, a portion of the matching bricks from other parts of the main hall were also recovered in order provide a supplementary reserve of matching bricks for contingency purposes.

Enviro-Pacific took detailed photos of the portico elements and annotated these with accurate measurements so that the portico could be reconstructed as an interpretive element in the new community park. See *Attachment 7 – Portico Measurements for Reconstruction*.

Reconstruction of the bronze lettering and building plaque falls within the purview of the Brisbane City Council.

5.4.1.1 Portico Deconstruction Work

Deconstruction of the portico proceeded in accordance with the instructions from the heritage architect. Figures 6 – 23 of Attachment 9 – Architectural Preservation show the details of the process.

5.4.2 Entry Gate

Retain original entry brick pillars and wrought iron gate elements from the former Greenslopes ARC Centre (c. 1946), located to south-west corner of the site. Reuse these original built elements in situ, as the new pedestrian side entrance. Undertake conservation works to these existing elements.

Retention of the brick and ironwork entry gate did not pose the same difficulties as the portico and the gate was left in situ during the demolition and remediation activities. It was protected with a plywood box covering during the works. Figures 24 – 28 of Attachment 9 – Architectural Preservation show the details of the process.

5.4.3 Legacy House and Urban Commons Interpretive Elements

Legacy House Interpretive Initiatives: *Proposed Legacy House design should seek to honour the former site use and function by the Australian Red Cross through creative expressions.*

Urban Elements: *Urban elements within the proposed Brisbane City Council community park should seek to honour the former site use and function by the Australian Red Cross through creative expressions.*

While these elements of the Heritage Interpretive Strategy “are beyond the scope of the Commonwealth Government to control or manage” (See Attachment 3 Heritage Interpretive Strategy, s.5, p.40) DVA sought to support heritage interpretive re-use of suitable material from the Australian Red Cross Hall by recovering over 500m² of hardwood timber flooring for use in the construction of elements in Legacy House and the new BCC public park.

An example of the re-use of this material is Legacy’s intention to construct the board room doors in Legacy House out of this hardwood.

Figures 29 – 33 of Attachment 9 – Architectural Preservation show the details of the process

5.5 Condition 5

*The approval holder must ensure that all **Gate and brick facade structures** of the main hall building of historical value within the **Action area** are retained for future re-installation.*

As per section 5.4.2 Entry Gate, above the brick entry gate was retained *in situ* and protected by plywood hoarding during the demolition and site remediation.

As per section 5.4.1 Entry Portico (p.32) the brick façade portico was retained via documentation of the built structure, careful deconstruction so that the materials could be re-used to reconstruct the portico, and storage at a Brisbane City Council depot ready for reconstruction as part of a community park.

5.6 Condition 6

*The approval holder must ensure that all **Asbestos Containing Material** is only removed in accordance with the **How to Safely Remove Asbestos codes of practice**.*

Compliant

All asbestos was removed in accordance with Enviro-Pacific's *Asbestos Removal Control Plan* (ARCP) (see Attachment 4) which references the *How to Safely Remove Asbestos code of practice* on p. 33. All asbestos removal was oversee by licensed asbestos assessors from Coffey Tetrattech (independent from the remediators, Enviro-Pacific) and their asbestos removal clearance certificates are at Attachment 5 – *Air Monitoring Report*, s3 Clearance Certificates – Asbestos, pp. 1070-1346).

The following series of photographs show some details of the asbestos removal work

Figure 7. EXTERNAL SCAFFOLD WITH 200UM PLASTIC SHEET RE-INSTALLMENT TO PROVIDE A SEMI-ENCAPSULATION FOR THE NON-FRIABLE ASBESTOS REMOVAL WORKS



Figure 8. WALLS MARKED "A" FOR ASBESTOS OR "NO" FOR KNOWN NON-ASBESTOS



Figure 9. ACCOMMODATION BLOCK WITH BOTH LEVELS ENCAPSULATED WITH 200UM RATED PLASTIC TO ALL OPENINGS IN PREPARATION FOR BOTH FRIABLE AND NON-FRIABLE ASBESTOS REMOVAL.



Figure 10. NEGATIVE AIR PRESSURE EXHAUST VENT HORIZONTAL, SHOWING NEGATIVE PRESSURE ENVIRONMENT BEING MAINTAINED FOR ASBESTOS REMOVAL WORK TO ENSURE CONTAINMENT OF ASBESTOS.



Figure 11. FRIABLE ASBESTOS REMOVAL



Figure 12. ASBESTOS REMOVAL CREW MEMBERS READY TO RECEIVE DOUBLE WRAPPED ASBESTOS WASTE FOR CAREFUL PLACEMENT IN WASTE SKIP



Figure 13. ENCLOSURE WITH SIGNAGE



Figure 14. LOCALISED EXCLUSION ZONE FOR THE PURPOSE OF LOADING OUT ASBESTOS WASTE INTO LINED SKIP.



Figure 15. EXCLUSION ZONES / BARRIERS IN PLACE WHILE ENCAPSULATED BUNDLES OF THE ASBESTOS WASTE BEING LOWERED FROM UPPER LEVEL FOR MANUAL LOADING INTO THE DOUBLE LINED WASTE BIN.



Figure 16. ASBESTOS WASTE LOAD OUT WITH BIN DOUBLE LINED AND AIRTIGHT.



5.7 Condition 7

*The approval holder must ensure that all **Asbestos Containing Material** is only managed in accordance with the **How to Manage and Control Asbestos codes of practice**.*

Compliant

Asbestos was removed in accordance with Enviro-Pacific's *Asbestos Removal Control Plan (ARCP)* (see Attachment 4). See Attachment 4 *Asbestos Removal Control Plan*, p. 33 for reference to *How to Manage and Control Asbestos codes of practice*.

Asbestos removal was overseen by Coffey Tetrtech (See Attachment 5 – *Air Monitoring Report*, s3 Clearance Certificates – Asbestos, p. 1070).

5.8 Condition 8

*The approval holder must ensure that all demolition work, and removal or demolition of any vegetation or equipment containing **Hazardous substances** (including lead, pesticides, etc.), is only conducted in accordance with the **Demolition work codes of practice**.*

Compliant

Hazardous Substances were removed in accordance with *Attachment 6 – Demolition Management Plan, Hazardous Substances*, p.6. The Demolition Work code of practice is referenced on p.2 of the *Attachment 6 – Demolition Management Plan*.

All removal of hazardous substances was overseen by Coffey Tetrattech and *Attachment 5 – Air Monitoring Report, s4, pp.1347* shows clearance certificates for lead removal demonstrating strict adherence to the code.

5.9 Condition 9

*The approval holder must ensure that all **Air monitoring** is conducted in accordance with the **Membrane Filter Method Guidance Note***

Compliant

Attachment 5 – Air Monitoring Report, s1, pp.2-215 show the daily analytical reports for asbestos air monitoring stating that Dust particulates were collected and filters examined in accordance with the *Guidance Note on the Membrane Filter Method for Estimating Airborne Asbestos Fibres NOHSC:3003 (2005)*.

5.10 Condition 10

*The approval holder must ensure that **Air monitoring** is undertaken during any removal of:*

- a) friable Asbestos Containing Material, and*
- b) more than 10m2 of bonded **Asbestos Containing Material**.*

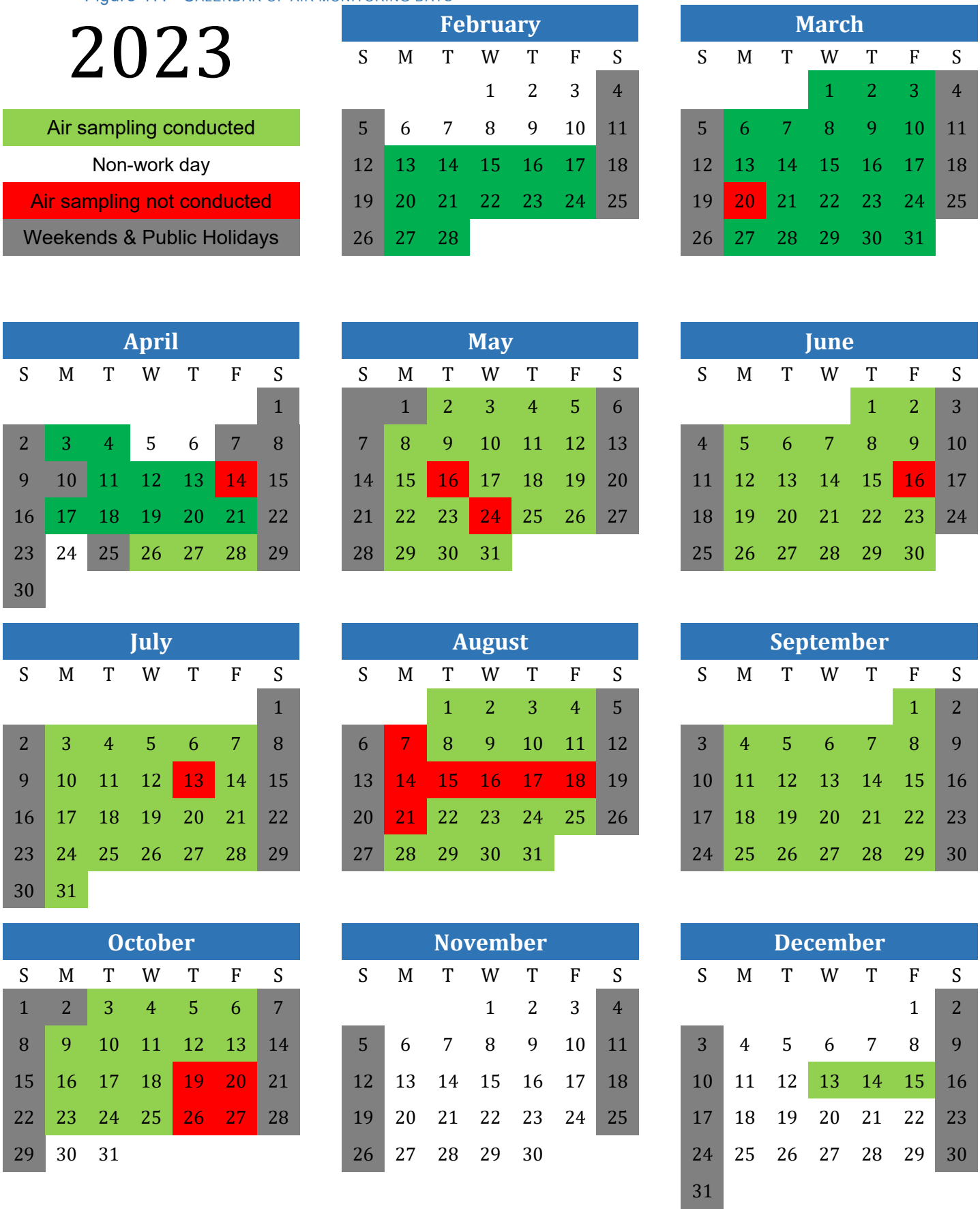
Compliant

DVA chose to err on the side of caution with air monitoring, conducting air monitoring on any day that there was any potential disturbance of asbestos. Below is a calendar showing all the days of air monitoring and work days in which no air monitoring was undertaken. This information is verifiable in Attachment 5, Air Monitoring Report, s1, pp.2-215.

Note that the gap between the end of October 2023 and mid December 2023 reflects the adverse validation sampling outcome that required remediators to return to site and conduct further works over three days in December 2023.

Clearance certificates issued by the Licensed Asbestos Assessors offer further validation of DVA's commitment to a robust air monitoring program (See Attachment 5, S3, pp 1070-1346)

Figure 17. CALENDAR OF AIR MONITORING DAYS



5.11 Condition 11

*The approval holder must ensure that removal of **Friable Asbestos Containing Material** is only undertaken by **Licensed asbestos assessor(s)**.*

Compliant

All asbestos removal was undertaken by licensed asbestos assessors in accordance with the plans:

- Attachment 4 - *Asbestos Removal Control Plan, s5.3, p. 14* to see certification and training requirements for all workers involved in asbestos removal.
- *Attachment 8 – Quality, Health, Safety & Environment Plan, s8.2.5, p.46* outlines asbestos removal licensing for all workers.

The following table shows the licensed asbestos assessors that supervised all asbestos works.

Table 2. LICENSED ASBESTOS ASSESSORS

Assessor	License #
Patricy Cortes	NSW LAA001543
Steph Hall	NSW LAA000162
Laura Smith	NTWS-AA-463856
Nicolas Kuerzinger	NSW LAA001069

See attachment 5, sections 1 (pp.2-215) and 3 (pp.1070 – 1346) for details of which assessor undertook a particular piece of work.

5.12 Condition 12

*The approval holder must ensure that air quality within the **Action area** does not exceed the asbestos exposure standard.*

Compliant

Layered risk mitigation strategies were put in place to ensure that air quality within the action area did not exceed the asbestos exposure standard.

A sealed negative pressure environment was created to ensure that air escaping from the asbestos removal areas was passed through a HEPA filter before exiting the asbestos removal zones. See:

- Figure 9 Accommodation block with both levels encapsulated with 200um rated plastic to all openings in preparation for both friable and non-friable asbestos removal. (p.35)
- Figure 10 Negative air pressure exhaust vent horizontal, showing negative pressure environment being maintained for asbestos removal work to ensure containment of asbestos. (p.36)
- Figure 11 Friable asbestos removal (p.36)

- Figure 12 Asbestos removal crew members ready to receive double wrapped Asbestos waste for careful placement in waste skip (p.37)
- Figure 13 Enclosure with signage (p.38)
- Figure 14 localised exclusion zone for the purpose of loading out Asbestos waste into lined skip. (p.39)
- Figure 15 Exclusion zones / barriers in place while encapsulated bundles of the Asbestos waste being lowered from upper level for manual loading into the double lined waste bin. (p.39)
- Figure 16 Asbestos waste load out with bin double lined and airtight. (p.40)

The enclosure integrity was tested by Coffey Tetrattech and confirmed to be suitable for asbestos removal. See Attachment 5 – Air Monitoring Report, Section 5 Enclosure Integrity Certification, pp.1428-1432

Air Monitoring throughout the demolition and remediation process consistently returned results below the detectable limits for asbestos. See Attachment 5 – Air Monitoring Report, Section 1 Asbestos Air Monitoring, pp.2-215.

5.13 Condition 13

*If **Air monitoring** detects exposure levels exceeding 0.02 fibres/ml, within 2 business days of the exceedance being detected, the approval holder must:*

- a) notify the **Department** in writing, and*
- b) submit, to the **Department**, a Remediation **Plan** detailing measures to:*
 - i) remediate the exceedance,*
 - ii) minimise impact to the environment and human health, and*
 - iii) avoid future exceedances of the **Asbestos exposure standard** within the **Action area**.*

Compliant

All asbestos air monitoring returned results below the detectable limits (i.e. <0.01 fibres/mL). See Attachment 5 — Air Monitoring Report, section 1, pp.2-215.

5.14 Condition 14

*The approval holder must submit all **Air Monitoring data** to the **Department** within five days of the completion of the Demolition work and within five days of the completion of the remediation and validation work.*

Not Applicable as at the end of the reporting period.

Site testing and review has not yet been endorsed by the Contaminated Land Auditor, leaving ambiguity as to whether further remediation is required. First “post-remediation” testing was conducted in late 2023 and resulted in the discovery of additional contamination requiring further remediation at the instruction of the Contaminated Land Auditor.

This additional remediation was subsequently undertaken and another round of testing was conducted. Subsequently the CLA requested further targeted testing and this was also conducted, adding to the CLID.

While the SQP has now submitted the CLID to the CLA again for review and the expectation is that we will receive the all clear to proceed, out of an abundance of caution we have not yet decided that validation of the results has been completed until the CLA has endorsed the CLID, leaving open the possibility that additional remediation may be required,

Air Monitoring Data for works completed thus far, however, has been included at *Attachment 5 – Air Monitoring Report* for transparency in this compliance report.

5.15 Condition 15

*The approval holder must ensure that all transport of all **Asbestos Containing Material** and hazardous material is only undertaken in accordance with ERA 57.*

Compliant

All asbestos and hazardous waste was “double-bagged” or “double-wrapped” in 200 µm plastic before being packed in 200 µm plastic lined skips for transport to disposal sites.

ACM roof sheeting and weatherboards painted with ACM paint were both sealed with PVA prior to bagging/wrapping with a double layer of 200µm plastic. All craning was conducted with ‘soft slings’ to avoid damaging the wrapping. See Figure 18 (p.45) to Figure 26 (p.51)

Figure 18. ASBESTOS WORKERS PREPARING THE REMOVED SHEETING INTO DOUBLE 200UM PLASTIC SHEET ENCAPSULATED PACKS FOR CRANING DOWN TO THE WASTE SKIP.

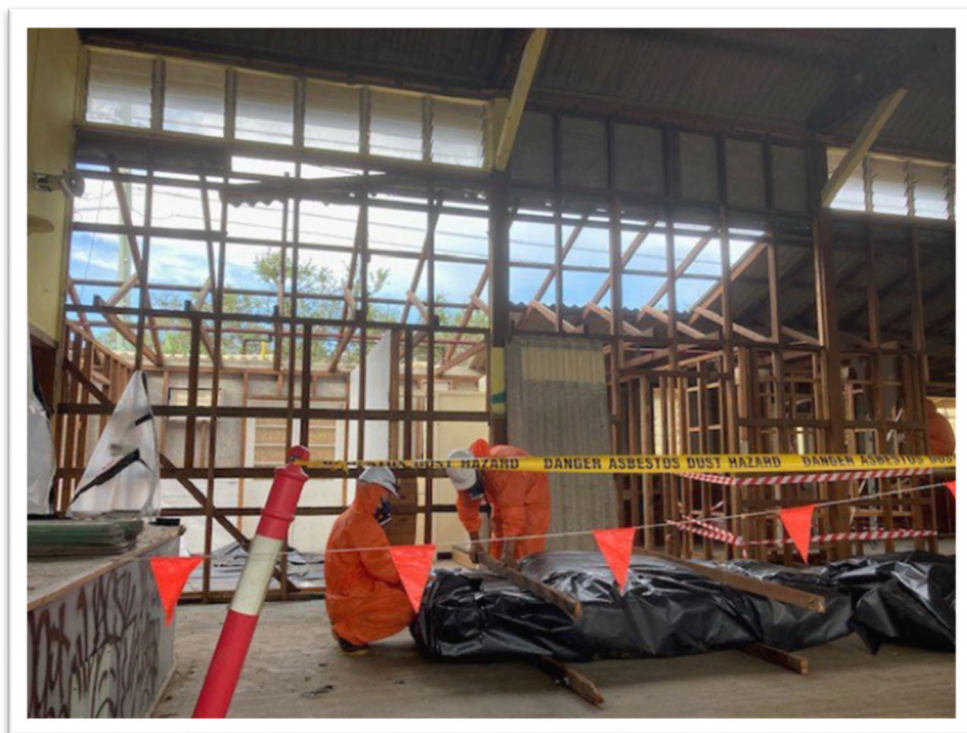


Figure 19. VARIOUS ENCAPSULATED PACKS READY FOR CRANING



Figure 20. DOUBLE-WRAPPED PACKS BEING CRANED DOWN INTO LINED ASBESTOS WASTE SKIP.



Figure 21. PVA SEALANT BEING APPLIED TO ACM SHEETING PRIOR TO HANDLING FOR LOAD OUT.



Figure 22. EWP (SCISSOR LIFT) BEING USED TO LOWER ACM SHEETING FOR TRANSFER TO WASTE SKIP



Figure 23. TRANSFER OF ACM SHEETING INTO DOUBLE-LINED SKIP UNDER DUST SUPPRESSION SPRAY.

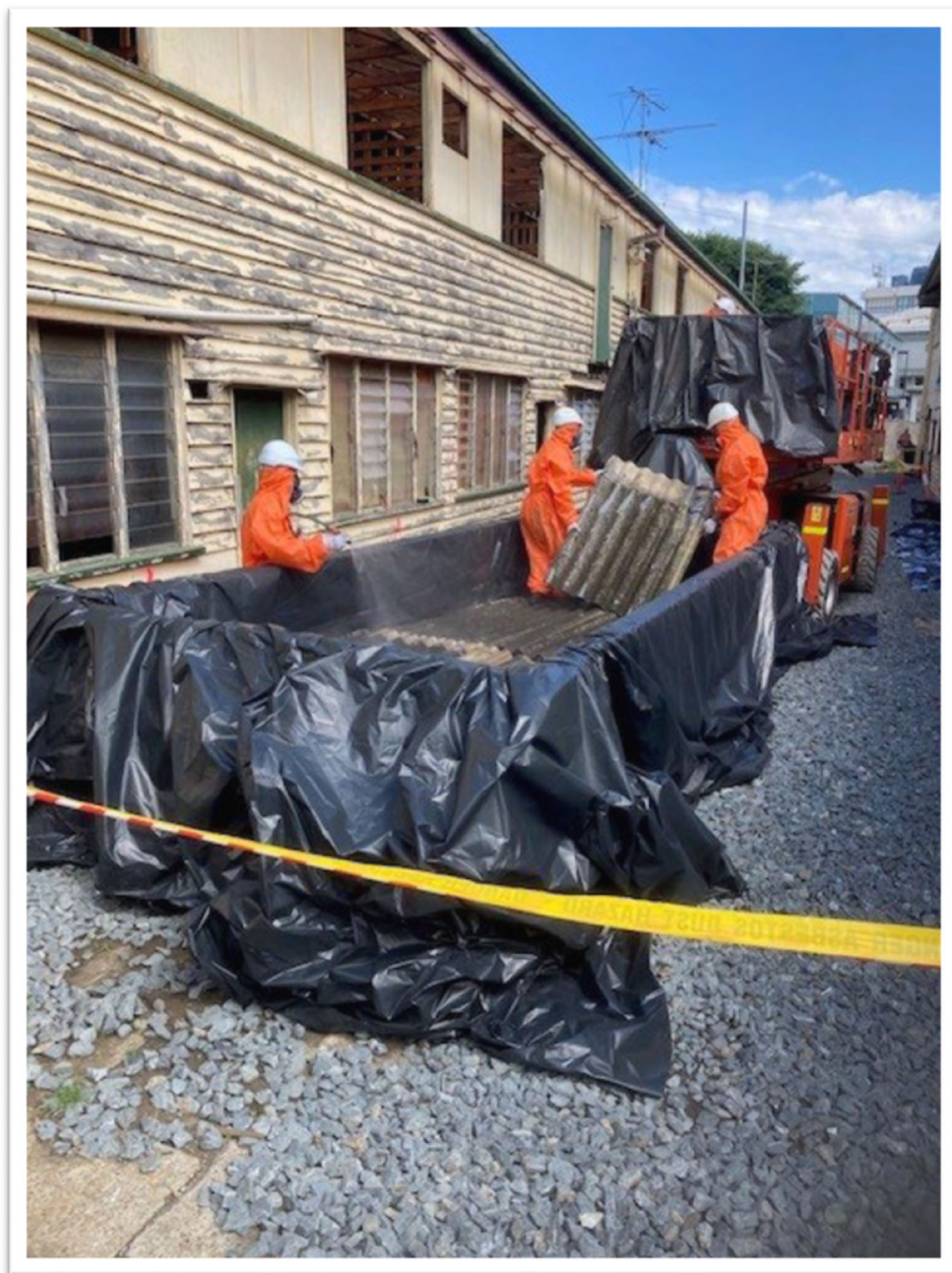




Figure 24. HANDLING AND ENCAPSULATION OF ACM SHEETING.



Figure 25. DOUBLE WRAPPED BUNDLES OF ASBESTOS WASTE BEING CRANED DOWN IN SOFT SLINGS



Figure 26. CONTROLLED REMOVAL OF THE EXTERNAL TIMBER (ACM PAINT)



5.16 Condition 16

*The approval holder must ensure that all **Asbestos Containing Materials** and **Hazardous substances** are only handled in accordance with the *Environmental Protection Regulation 2019 (Qld)*.*

Compliant

The Asbestos Removal Control Plan (Attachment 4) details the methodology employed for handling asbestos and other hazardous substances. Section 14 (p.33) of the plan explicitly references the *Environmental Protection Regulation 2019 (Qld)*.

Clearance certificates issued by the Licensed Asbestos Assessors offer further validation of DVA's commitment to adherence with all relevant regulations. See Attachment 5, S3, pp 1070-1346 for asbestos clearance certificates and S4, pp.1347-1427 for lead clearance certificates (1500).

All works involving hazardous materials, including asbestos, was supervised by licensed independent asbestos assessors (see *Figure 17 Calendar of air monitoring days* on p.42).

5.17 Condition 17

*The approval holder must ensure that all **Asbestos Containing Material** and hazardous materials are only disposed of in accordance with the **How to Safely Remove Asbestos codes of practice**.*

Compliant

All asbestos was removed in accordance with Enviro-Pacific’s *Asbestos Removal Control Plan* (ARCP) (see Attachment 4) which references the *How to Safely Remove Asbestos code of practice* on p. 33. All asbestos removal was oversee by licensed asbestos assessors from Coffey Tetrattech (independent from the remediators, Enviro-Pacific) and their asbestos removal clearance certificates are at Attachment 5 – *Air Monitoring Report*, s3 Clearance Certificates – Asbestos, pp. 1070-1346).

The photographs at Figure 7 to Figure 16 (pp.34-40) show asbestos management practices in place and all air monitoring tests returned asbestos concentrations below the detectable limits (see Attachment 5, s1, pp.2-215).

Disposal permits are detailed in Appendix H1 of Attachment 10 – draft CLID.

5.18 Condition 18

*The approval holder must ensure that removal of **Asbestos Containing Material** is only undertaken by **Licensed asbestos assessor(s)**.*

Compliant

All asbestos removal was undertaken by licensed asbestos assessors in accordance with the plans:

- Attachment 4 - *Asbestos Removal Control Plan*, s5.3, p. 14 to see certification and training requirements for all workers involved in asbestos removal.
- Attachment 8 – *Quality, Health, Safety & Envrionment Plan*, s8.2.5, p.46 outlines asbestos removal licensing for all workers.

The following table shows the licensed asbestos assessors that supervised all asbestos works.

Table 3. LICENSED ASBESTOS ASSESSORS

Assessor	License #
Patricy Cortes	NSW LAA001543
Steph Hall	NSW LAA000162
Laura Smith	NTWS-AA-463856
Nicolas Kuerzinger	NSW LAA001069

See attachment 5, sections 1 (pp.2-215) and 3 (pp.1070 – 1346) for details of which assessor undertook a particular piece of work.

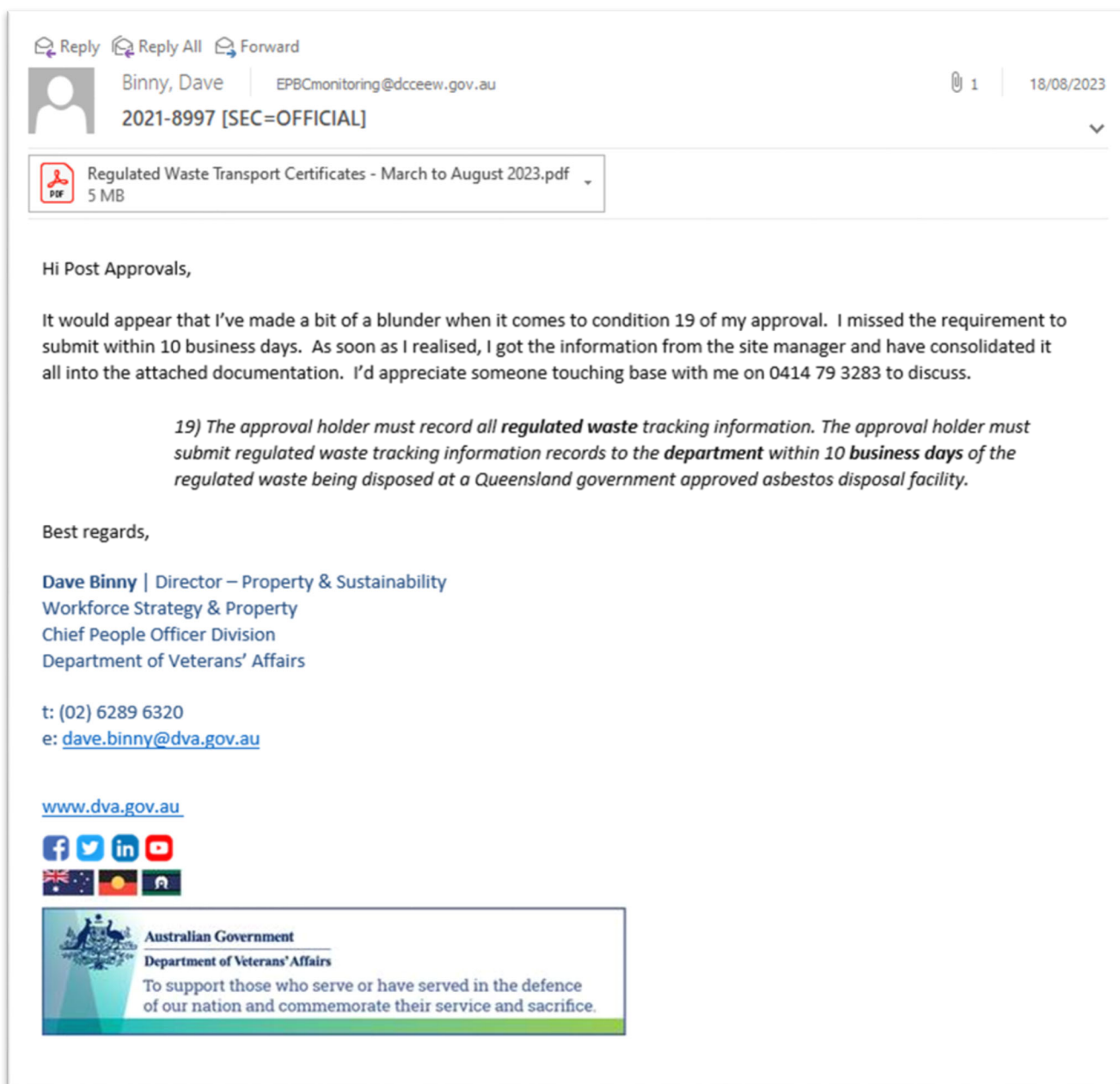
5.19 Condition 19

*The approval holder must record all **Regulated waste** tracking information. The approval holder must submit **Regulated waste** tracking information records to the **Department** within 10 business days of the **Regulated waste** being disposed at a Queensland government approved asbestos disposal facility*

Non-Compliant

Regulated waste tracking information was not submitted to the Department within 10 business days. Immediately upon becoming aware of the oversight, the regulated waste tracking information was submitted to the department in the same email as the notification. See Figure 27 on p.54.

Figure 27. NOTIFICATION OF NON-COMPLIANCE WITH CONDITION 19



5.20 Condition 20

*The approval holder must prepare a Remediation Action **Plan** (RAP) to manage environmental and public safety throughout the action. The RAP must detail **Remediation and validation works** to be undertaken within the **Action area**. The RAP must be reviewed and endorsed by an **Independent** contaminated land auditor. The approval holder must submit the endorsed RAP to the **Department** within 10 business days of the RAP being endorsed by the **Independent** contaminated land auditor. The approval holder must implement the endorsed RAP for the **Remediation and validation phase**.*

Compliant

An independent contaminated land auditor has reviewed and endorsed the RAP (see Attachment 13, s5, p.2 and see Figure 28 on p.55)

The RAP was submitted to the Department within 10 business days of endorsement by independent CLA (See Figure 29 on p.56)

Figure 28. EMAIL FROM DEPARTMENT ACKNOWLEDGING SUBMISSION OF ENDORSED RAP

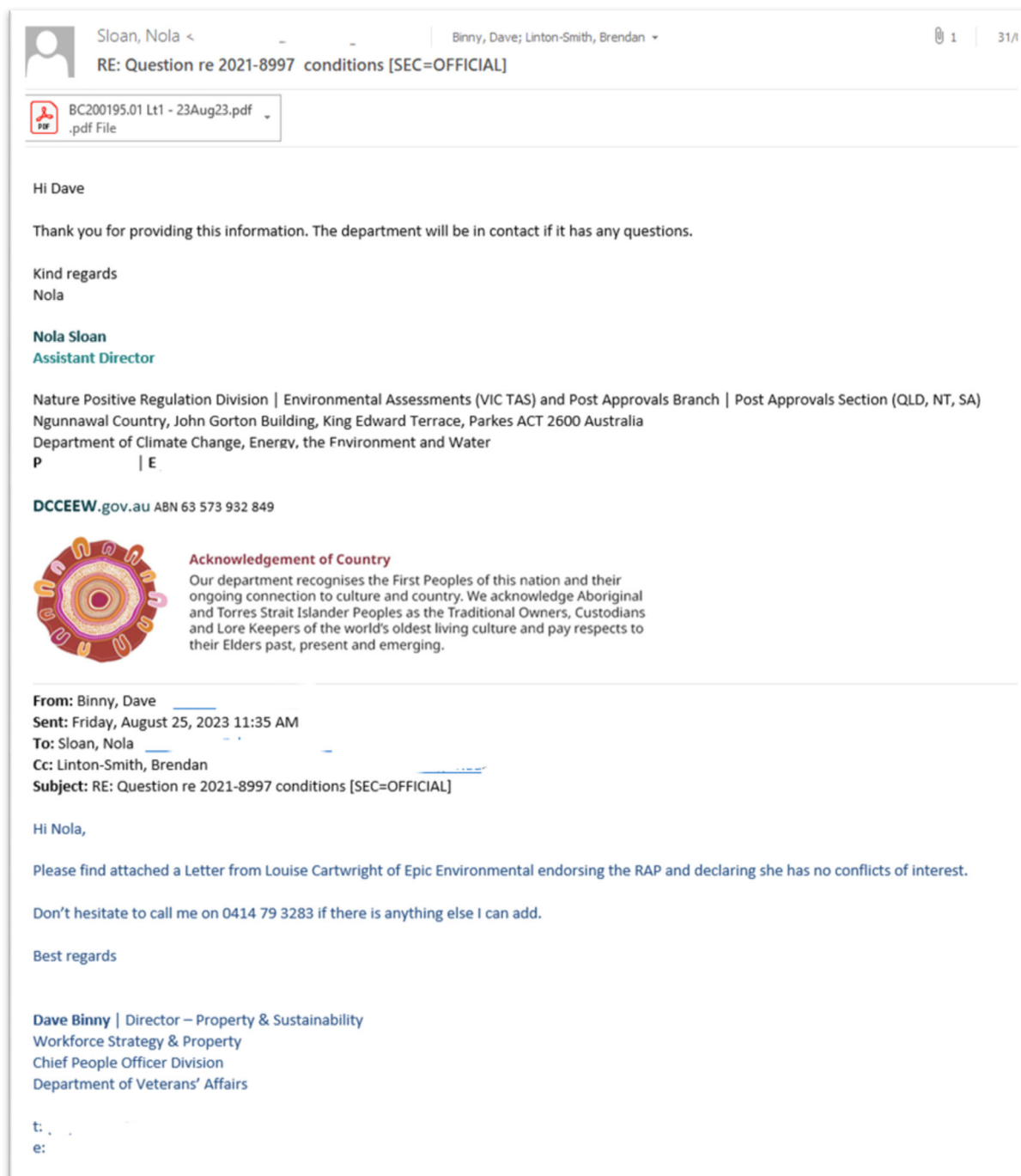
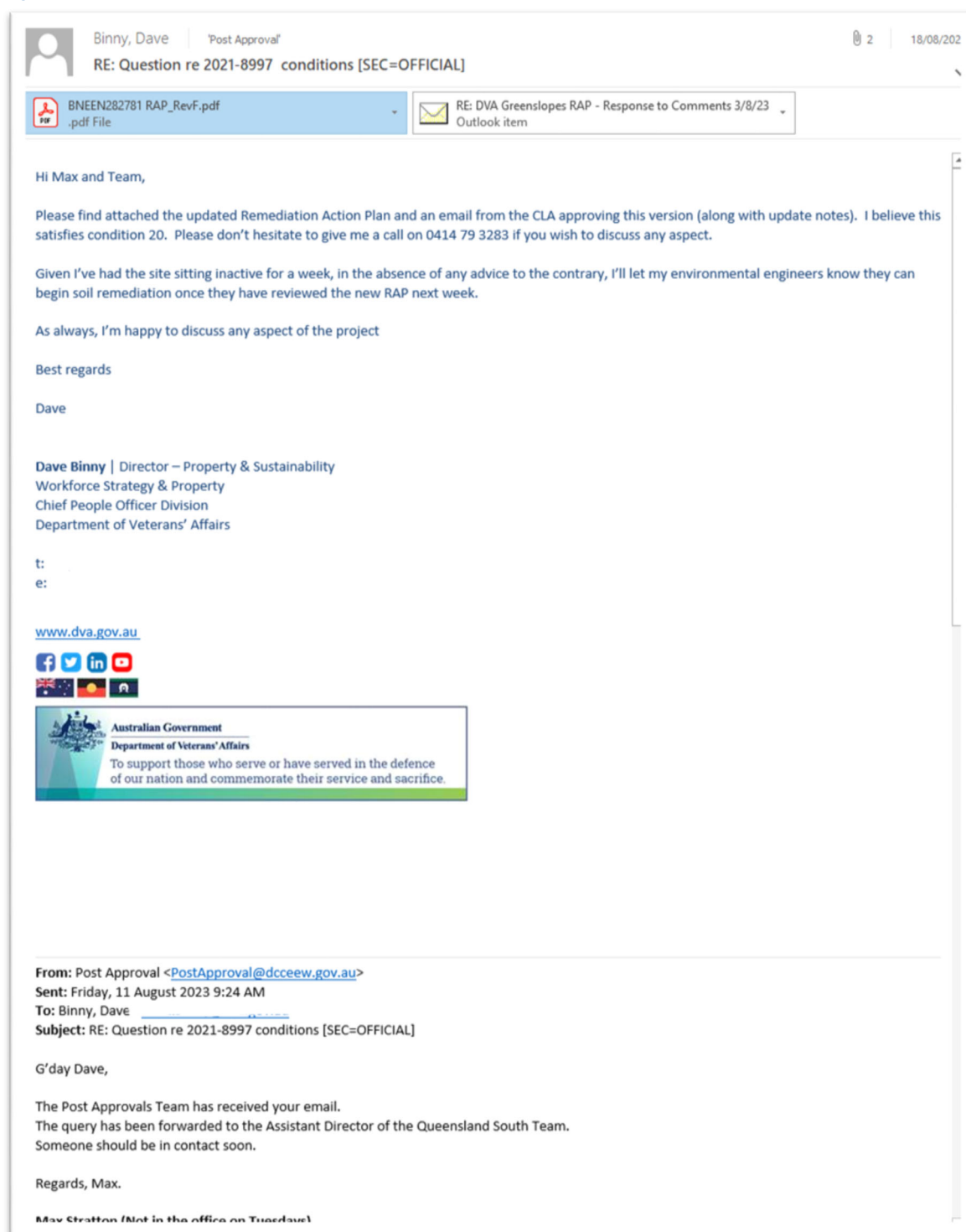


Figure 29. EMAIL TO DEPARTMENT SUBMITTING RAP



5.20.1 Requirements of the RAP

Section	Condition	Compliance	Evidence
8.6	Material movements and tracking	Compliant	<ul style="list-style-type: none"> See section 5.19 (p.53)

Section	Condition	Compliance	Evidence
8.7	Validation Sampling		<ul style="list-style-type: none"> See Attachment 10 – draft CLID
8.8	Fill	Compliant	<ul style="list-style-type: none"> See 5.22 Condition 22 (p.59)
8.9	Inspections	Compliant	<ul style="list-style-type: none"> SQP onsite on almost all workdays and every week. See Figure 17 on p.42
9	CLID	Compliant	<ul style="list-style-type: none"> See Attachment 10
10.1	OH&S	Compliant	<ul style="list-style-type: none"> See Attachment 18 - Quality Health Safety and Environment Plan
10.2	Inductions	Compliant	<ul style="list-style-type: none"> See attachment 17 for example
10.3	Record Keeping	Compliant	<ul style="list-style-type: none"> See attachment 17 for example
10.4	Toolbox Talks	Compliant	<ul style="list-style-type: none"> See Attachment 17 for example
10.5	Access	Compliant	<ul style="list-style-type: none"> See Attachment 17 for example
10.7	Community Consultation	Compliant	<ul style="list-style-type: none"> See Attachment 20 -
10.9	Dust suppression	Compliant	<ul style="list-style-type: none"> See Figure 30 (p.58) See Figure 31 (p.58) See Figure 3259
10.10	Air monitoring	Compliant	<ul style="list-style-type: none"> See Attachment 5
10.11	Erosion & Sediment Control	Compliant	<ul style="list-style-type: none"> See Attachment 2, s5.3, p.12
10.12	Surface water discharge	Compliant	<ul style="list-style-type: none"> See Attachment 2, s5.3, p.12

Figure 30. GEOTEXTILE EMPLOYED FOR DUST SUPPRESSION



Figure 31. WATER SPRAY DUST SUPPRESSION OF SOIL BEING LOADED INTO SKIP



Figure 32. WATER SUPPRESSION DURING MECHANICAL DEMOLITION



5.21 Condition 21

*The approval holder must ensure all **Excavation work** is undertaken in accordance with the **Excavation work** codes of practice.*

Compliant

The excavation Work code of practice is primarily concerned with the risk of collapse, which may trap or injure workers (See Attachment 15 – Excavation Work code of practice). “Excavation work” is defined in the code of practice as

Construction work, including work connected with an excavation carried out in or near:

- a shaft or trench with an excavated depth of greater than 1.5 metres, or*
- a tunnel*

Work performed on the site was limited to “surface scrapes” with no excavations over 1.5 metres. Therefore no excavation work was undertaken as part of the remediation of the site.

5.22 Condition 22

The approval holder must ensure that all imported fill is free of hazardous material contamination and is suitable for all future land uses.

Compliant

All imported material was sourced from certified Virgin Excavated Natural Material (VENM). See Attachment 10 – Draft Contaminated Land Investigation Document (CLID), Appendix H.3, pp.17-18

5.23 Condition 23

*The approval holder must not sell the **Action area** until all **Remediation and validation works** specified in the endorsed RAP are completed.*

Not Applicable as at the end of the reporting period.

The sale of the land has not yet been completed, therefore at the end of the reporting period this condition is not applicable.

However, as at 15 May 2024, the CLID has been lodged with the CLA in the expectation that they will endorse it, verifying that the works as described in the RAP are completed.

See Attachment 10 – DRAFT Contaminated Land Investigation Document (CLID).

5.24 Condition 24

*Prior to the sale of the **Action area**, the approval holder must engage:*

- a) a **suitably qualified person** to prepare a Site Suitability Statement which evaluates the suitability of the **Action area** for all potential future land uses, and*
- b) an **Independent Contaminated Land Auditor** to evaluate the contaminated land investigation documentation, and the Site Suitability Statement against the requirements of 389(1) and 392(2) of the Environmental Protection Act 1994 (Qld).*

Note: the suitably qualified person and the Independent Contaminated Land Auditor cannot be the same person.

Compliant

Jeremy Wicks of Coffey Tetrattech was engaged by DVA as the suitably qualified person to prepare a site suitability statement and CLID for the action area. The CLID with all its attachments is presented in full as a zip file at Attachment 10. The document *BNEEN282781_Validation Report_RevD* within that archive is the **Draft** CLID, and a site suitability statement can be viewed at section 9 on p.82 of that document.

Louise Cartwright of Epic Environmental was engaged to provide services as an independent contaminated land auditor. Evidence of Louise's engagement can be seen at Attachment 13, in which she presents endorsement of the RAP.

As at the date of this report, the CLID (and therefore the site suitability statement) have not yet been endorsed by the CLA, however the documents were submitted for her review on 11 May 2024. See Figure 33 on p.61 for an email acknowledging her receipt of the CLID and site suitability statement.

Figure 33. EMAIL FROM CLA ACKNOWLEDGING RECEIPT OF FULL CLID PACKAGE

From: Louise Cartwright
Sent: Monday, May 13, 2024 1:00 PM
To: Wicks, Jeremy
Cc: Diana Bedder; Binny, Dave
Subject: Email - spam??


⚠ CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

Hi Jeremy,

I have found the below email in my spam folder. Could you confirm this is a real email and whether I should download? The message seems correct but the email address and timing (Sunday evening) seem strange.

Thank you.

Tetra Tech MFT: DVA Greenslopes Validation Report Rev D for Review

 Wicks, Jeremy
To: Louise Cartwright; Diana Bedder
Return Policy: Junk Email (30 days)
Expires: 11/06/2024

ⓘ This sender domain@tetratech.com is from outside your organization.
ⓘ This item will expire in 29 days. To keep this item longer apply a different Retention Policy.
Links and other functionality have been disabled in this message. To turn on that functionality, move this message to the inbox.
We converted this message into plain text format.

Tetra Tech Managed File Transfer

New Secure File Package is Available to Download until Monday, 27 May

Louise, Dave

The amended CLID (Validation Report) can be downloaded via this link.

As discussed I am waiting on EPS to provide further information on utilities removed on the Site during remediation, and final numbers for the disposal permits/waste levy exemptions. Utilities are not considered migration pathways for the contaminants of concern and this has been stated in the CLID. The outstanding information will be provided once it has been received from EPS. The CLID has undergone a substantial revision based on the comments and is considered ready for review.

Best regards
Jeremy

This link will not work for anyone else. The secure file package is available until: Monday, 27 May. After this date contact the sender.

Files attached to this message

Filename	Size
DVA-Greenslopes Validation Report Rev D.zip	208 MB

Download Files

Louise Cartwright
Principal Environmental Scientist
Contaminated Land Auditor Qld/NT/Tas
BAGSc(Hons), PhD(Soil Science), CPSS CSAM

M:

L17, 95 North Quay, Brisbane, Q, 4000
www.epicenvironmental.com.au

5.25 Condition 25

*The approval holder must submit the **contaminated land investigation documentation** and the **Site Suitability Statement** to the **Department** within 15 business days of the date the approval holder receives the **Independent** contaminated land auditor's evaluation of the **contaminated land investigation documentation** and the **Site Suitability Statement**.*

Not Applicable

The independent contaminated land auditor did not evaluate the CLID during the reporting period.

5.26 Condition 26

*Prior to the sale of the **Action area**, the approval holder must submit written evidence to the **Department** demonstrating suitability of the **Action area** for all future land uses, and that the **Action area** has been removed from the Environmental Management and Contaminated Land registers under the Queensland Environmental Protection Act 1994 (Qld).*

Not Applicable

As at the end of the reporting period the action area has not been sold. The CLID is currently with the Contaminated Land Auditor for review and submission to the Department of Environment and Science seeking its removal from the EMR is anticipated to occur in May-June 2024.

5.27 Condition 27

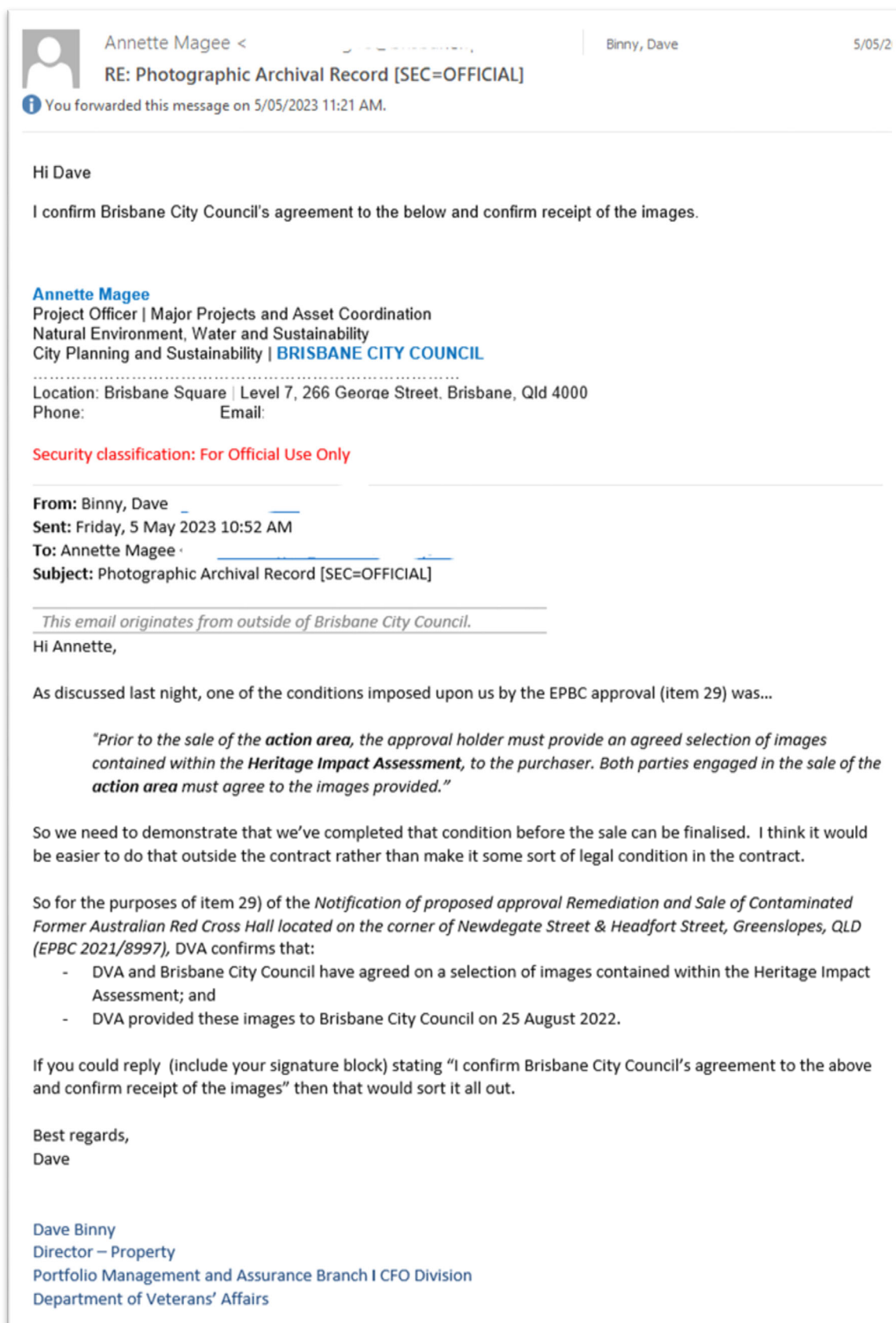
*Prior to the sale of the **Action area**, the approval holder must provide an agreed selection of images contained within the Heritage Impact Assessment, to the purchaser. Both parties engaged in the sale of the **Action area** must agree to the images provided.*

Compliant

DVA commissioned a full Archival Photographic Record of the action area including professional aerial and terrestrial photography. This has been provided to the BCC and they have acknowledged receipt and agreement to the collection of images provided.

Figure 34 on p.63 is a facsimile of the email in which BCC have acknowledge receipt and agreement.

Figure 34. EMAIL FROM BCC AGREEING TO IMAGES AND ACKNOWLEDGING RECEIPT



5.28 Condition 28

*Historical images provided to the purchaser of the **Action area** must be of sufficient quality to be reproducible in A4 size.*

Compliant

Attachment 12 Archival Photographic Record Report is a low resolution copy of the full archival record. It has not been possible to publish the full archival record on the DVA website or provide it to the Department as part of this report due to the large file sizes. However, it could be made available via a number of file transfers if requested, albeit in discrete packages as it is also too large for the government file transfer service, Macquarie SigBox.

- The full archive is 6.5GB in size (see Figure 35 on p.64)
- Individual photographs are very high resolution (typically in the region of 8700x5800 pixels) and typically in the region of 20mb each (see Figure 36 on p.65)
- The full archive contains 845 files (see Figure 35 on p.64)

Figure 35. SIZE OF FULL ARCHIVAL PHOTOGRAPHIC RECORD

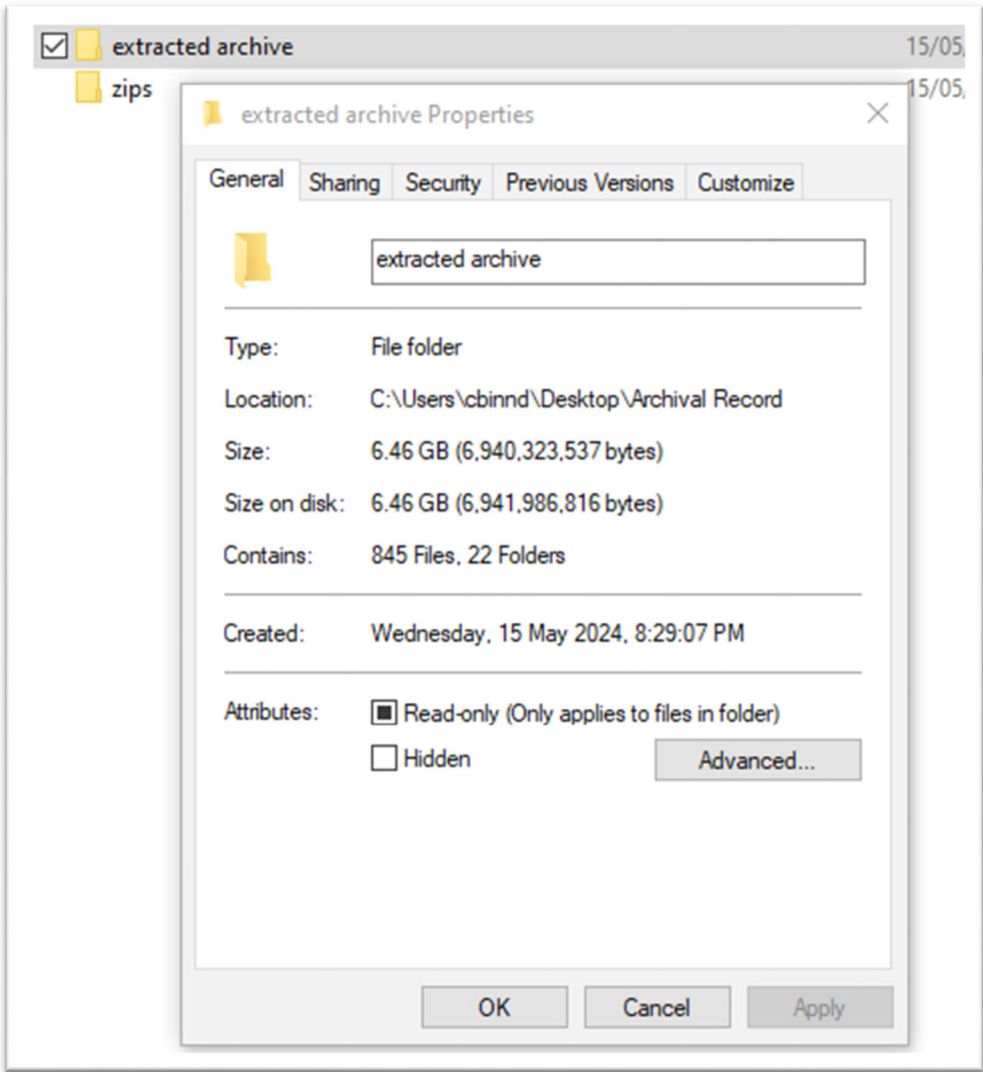


Figure 36. EXAMPLES OF SIZE AND RESOLUTION OF INDIVIDUAL PHOTOGRAPHS

Desktop > Archival Record > A - Feature Images - ground			
Name	Dimensions	Type	Size
2019 Nov_Greenslopes ARC_Hall_Ext_West Elevation_Looking North	8688 x 5792	JPG File	28,548 KB
2019 Nov_Greenslopes ARC_Hall_Ext_West Elevation_Looking South	8688 x 5792	JPG File	32,744 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Looking NE	8666 x 5777	JPG File	21,278 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Looking SE	8666 x 5777	JPG File	25,308 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Stage_Floor Lighting	6952 x 4635	JPG File	13,217 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Stage_Looking SW_01	8653 x 5769	JPG File	24,078 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Stage_Looking SW_02	8656 x 5771	JPG File	22,398 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Stage_Looking up at Proscenium	8688 x 5792	JPG File	55,886 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Stage_Looking West	8623 x 5749	JPG File	22,106 KB
2019 Nov_Greenslopes ARC_Hall_Int H1_Trap Door to Lower Level	8526 x 5684	JPG File	20,447 KB
2019 Nov_Greenslopes ARC_Hall_Int H4_Northern Kitchen_Looking East Through Servery	8625 x 5750	JPG File	22,265 KB
2019 Nov_Greenslopes ARC_Hall_Int H4_Northern Kitchen_NE Corner	8657 x 5771	JPG File	21,330 KB
2019 Nov_Greenslopes ARC_Hall_Int H5_Northern Large Room_Looking SE	8665 x 5777	JPG File	22,628 KB
2019 Nov_Greenslopes ARC_Hall_Int H6_Northern Room_NE Corner	8646 x 5764	JPG File	22,196 KB
2019 Nov_Greenslopes ARC_Hall_Int H14_Southern Large Room_Looking SE	8659 x 5773	JPG File	19,502 KB
2019 Nov_Greenslopes ARC_Hall_Int M2_Mezzanine_Looking Down Projection Room Ladd...	8666 x 5777	JPG File	21,735 KB
2019 Nov_Greenslopes ARC_Hall_Int M2_Mezzanine_Looking East Through Projection Win...	8664 x 5776	JPG File	19,217 KB
2019 Nov_Greenslopes ARC_Hall_Int M2_Mezzanine_Projection Room_SE Corner	8659 x 5773	JPG File	19,245 KB
2019 Nov_Greenslopes ARC_Hall_Int U12_Lower Level_Looking East	8688 x 5792	JPG File	71,390 KB
2019 Nov_Greenslopes ARC_Hall_Int U12_Lower Level_Looking West	8666 x 5777	JPG File	25,188 KB
2019 Nov_Greenslopes ARC_Hall_Int U12_Lower Level_NW Corner	8688 x 5792	JPG File	71,202 KB
2019 Nov_Greenslopes ARC_Hall_Int U12_Lower Level_Timber Floor Detail	8630 x 5753	JPG File	26,883 KB
2019 Nov_Greenslopes ARC_Hostel_Int L2_Lower Level_NW Corner Room_Looking SW	8650 x 5767	JPG File	17,339 KB
2019 Nov_Greenslopes ARC_Hostel_Int L3_Lower Level_Narrow Room Adjacent L4 Large Ce...	8653 x 5769	JPG File	18,015 KB
2019 Nov_Greenslopes ARC_Hostel_Int L4_Lower Level_Large Central Room_Looking NW T...	8618 x 5745	JPG File	18,280 KB
2019 Nov_Greenslopes ARC_Hostel_Int L4_Lower Level_Large Central Room_Looking NW	8634 x 5756	JPG File	16,744 KB
2019 Nov_Greenslopes ARC_Hostel_Int L5_Lower Level_Eastern Amenities_Looking South	8665 x 5777	JPG File	16,024 KB
2019 Nov_Greenslopes ARC_Hostel_Int L6_Lower Level_Eastern Lounge_Looking SW	7699 x 5133	JPG File	15,293 KB
2019 Nov_Greenslopes ARC_Hostel_Int L8_Lower Level_Corridor_Looking East	8140 x 5427	JPG File	19,474 KB
2019 Nov_Greenslopes ARC_Hostel_Int L9_Lower Level_Southern Linen Room_Looking South	8664 x 5776	JPG File	20,688 KB
2019 Nov_Greenslopes ARC_Hostel_Int U1_Upper Level_Original Next-Of-Kin Flat_Looking ...	7217 x 4812	JPG File	13,695 KB
2019 Nov_Greenslopes ARC_Hostel_Int U2_Upper Level_NE Corner Lounge_SW Corner	8657 x 5771	JPG File	17,088 KB
2019 Nov_Greenslopes ARC_Hostel_Int U3_Upper Level_SE Corner Amenities_Looking East	8632 x 5755	JPG File	17,264 KB
2019 Nov_Greenslopes ARC_Hostel_Int U4_Upper Level_Central East-West Corridor_Lookin...	4957 x 7435	JPG File	12,534 KB
2019 Nov_Greenslopes ARC_Hostel_Int UB1_Upper Level_Bed 1_West Window	8679 x 5786	JPG File	36,668 KB

5.29 Condition 29

*Prior to the sale of the **Action area**, the approval holder must provide a copy of the **Heritage Interpretative Strategy** to the purchaser for reference to assist in the preservation of historical values at the site as part of future land use.*

Compliant

DVA has provided the full Heritage Interpretive Strategy to the BCC. See Figure 37 on p.66.

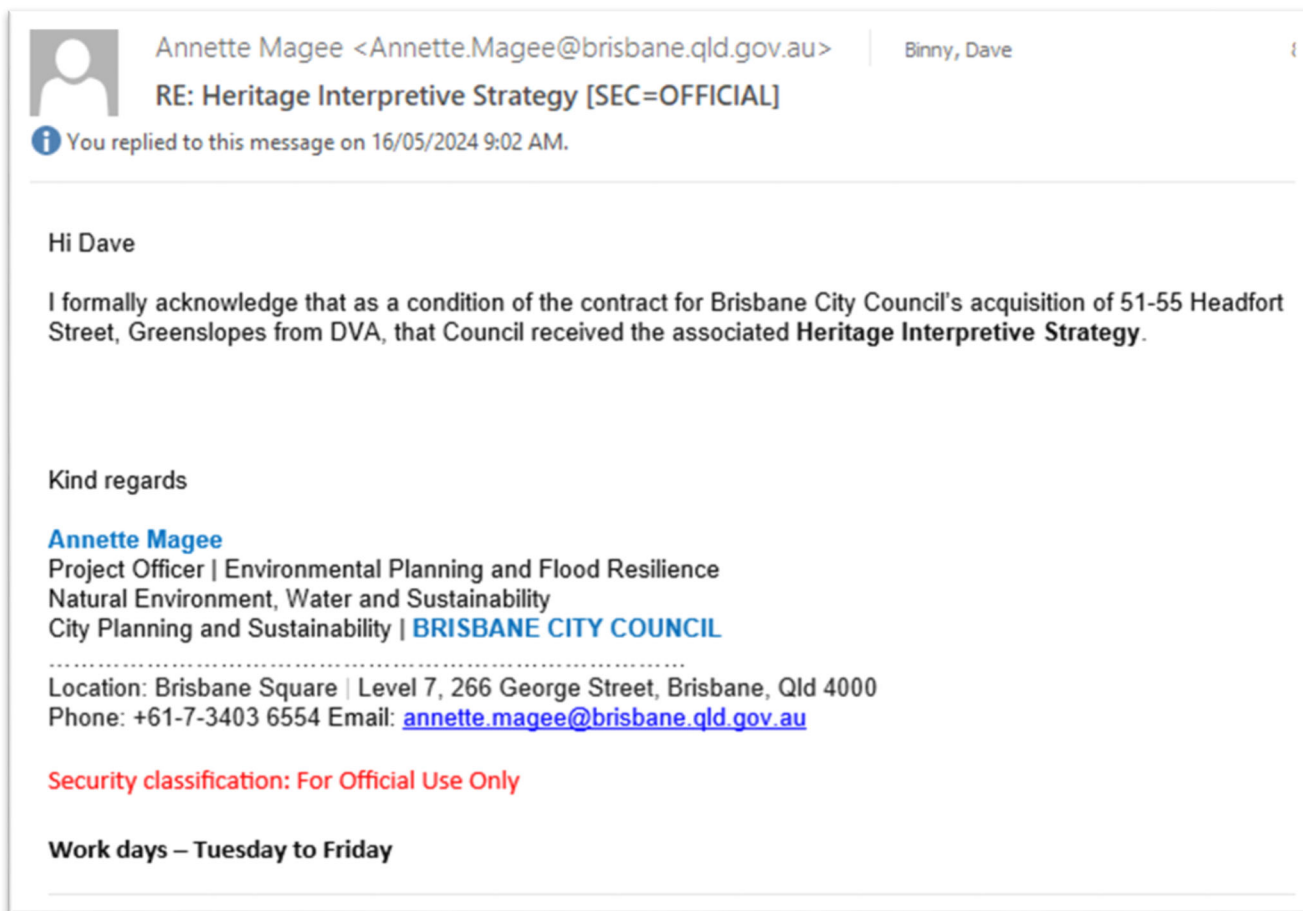


Figure 37. EMAIL FROM BCC ACKNOWLEDGING RECEIPT OF HERITAGE INTERPRETIVE STRATEGY

5.30 Condition 30

*If the **Action area** is sold, the approval holder must notify the **Department** in writing of the completion of the sale of the **Action area** and provide the **Department** with a copy of the deed of ownership within 30 business days of the settlement date.*

Not Applicable as at the end of the reporting period.

The sale of the land has not yet been completed, therefore at the end of the reporting period this condition is not applicable.

5.31 Condition 31

*If the approval holder has not sold the **Action area** within 15 years from the date of this approval, then the approval holder must not sell the **Action area** without the prior written agreement of the **Minister**.*

Not Applicable

This condition is **Not Applicable** as it does not become relevant until 15 years from the date of approval. The date of approval being 3 February 2023, this condition is not applicable until 3 February 2038. See Attachment 8 – Decision Notice, p.2.

5.32 Condition 32

*The approval holder must submit all **Plans** and reports required by these conditions electronically to the **Department**.*

Compliant

All plans required by these conditions submitted electronically to the Department. See *Figure 29 Email to Department submitting RAP* (p.56)

5.33 Condition 33

*Unless otherwise agreed to in writing by the **Minister**, the approval holder must publish each **Plan** on their **Website** within 15 business days of the date:*

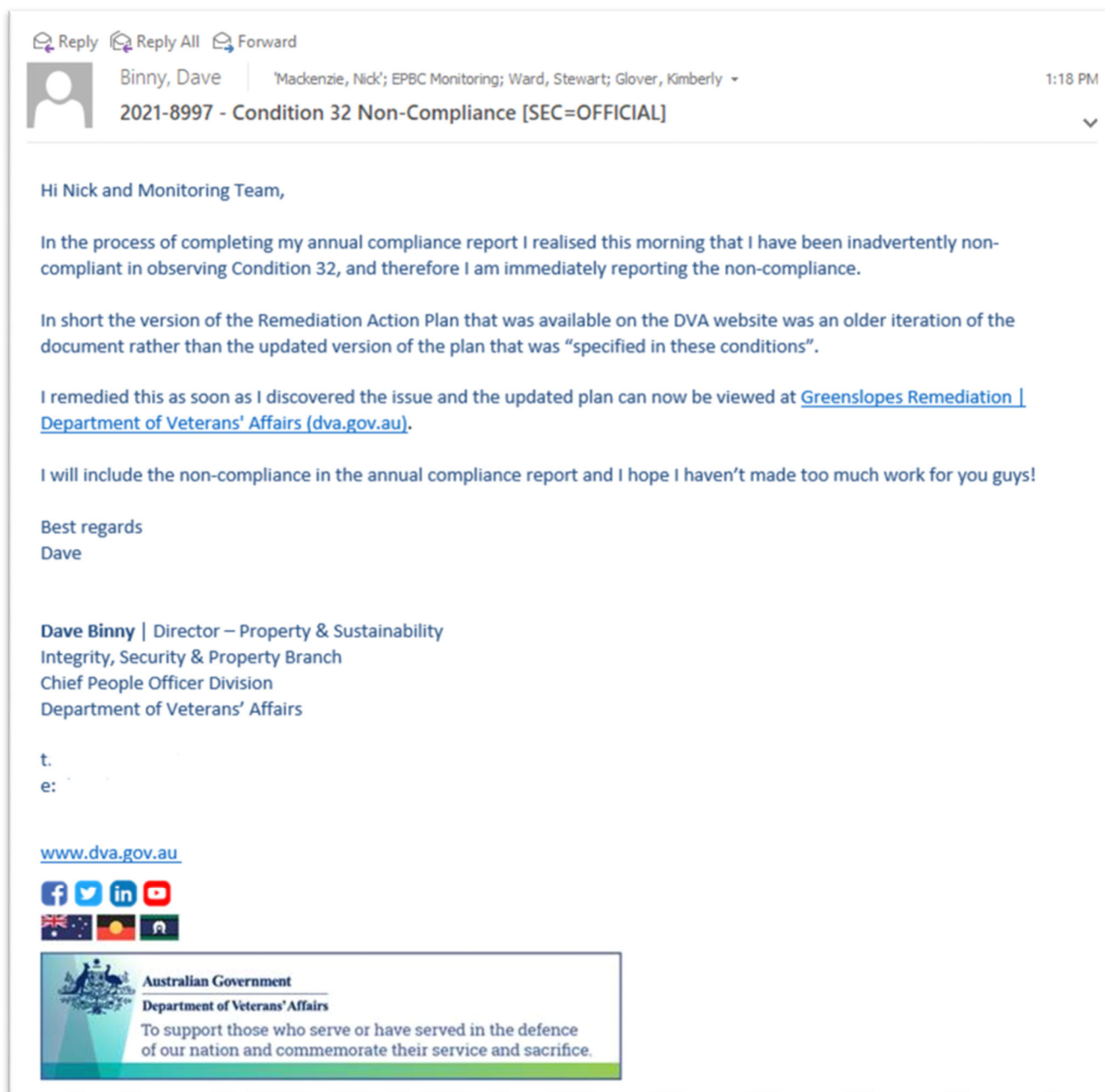
- a) of this approval, if the version of the **Plan** to be implemented is specified in these conditions, or*
- b) the **Plan** is submitted to the **Department** in accordance with a requirement of these conditions, if the **Plan** does not require the approval of the **Minister**.*

Non-Compliant

Copy of the Remediation Action Plan on the website was an old version and not the version updated as a result of the approval conditions. This was remedied on 16 May 2024 and the correct plan can be viewed at [Greenslopes Remediation | Department of Veterans' Affairs \(dva.gov.au\)](https://dva.gov.au/greenslopes/remediation)

The Non-compliance was reported immediately on 16 May 2024 to the EPBC Monitoring team via email (see Figure 38 on p.68).

Figure 38. NOTIFICATION OF NON-COMPLIANCE WITH CONDITION 33 OF THE APPROVAL



5.34 Condition 34

*The approval holder must keep all published **Plans** required by these conditions on their **Website** until the expiry date of this approval.*

Compliant

Plans required by these conditions are published on the DVA website at [Greenslopes Remediation | Department of Veterans' Affairs \(dva.gov.au\)](https://www.dva.gov.au/greenslopes-remediation)

5.35 Condition 35

*The approval holder must notify the **Department** electronically of the date of commencement of the Action, within 5 business days of commencement of the Action.*

Compliant

This condition was satisfied on 15 March 2023 via a series of emails.

- First an email informing the Department of the commencement of action (See Figure 39 *Commencement of action notification* p.70)
- A response from the Department's monitoring team clarifying the requirements of Condition 35 (see Figure 40 *Email clarifying requirements* p.71)
- A follow up email confirming commencement of action with an explanation of the work undertaken meeting the definition of "commencement of action" (See Figure 41 *Explanatory email confirming commencement of action* p.72)

Figure 39. COMMENCEMENT OF ACTION NOTIFICATION

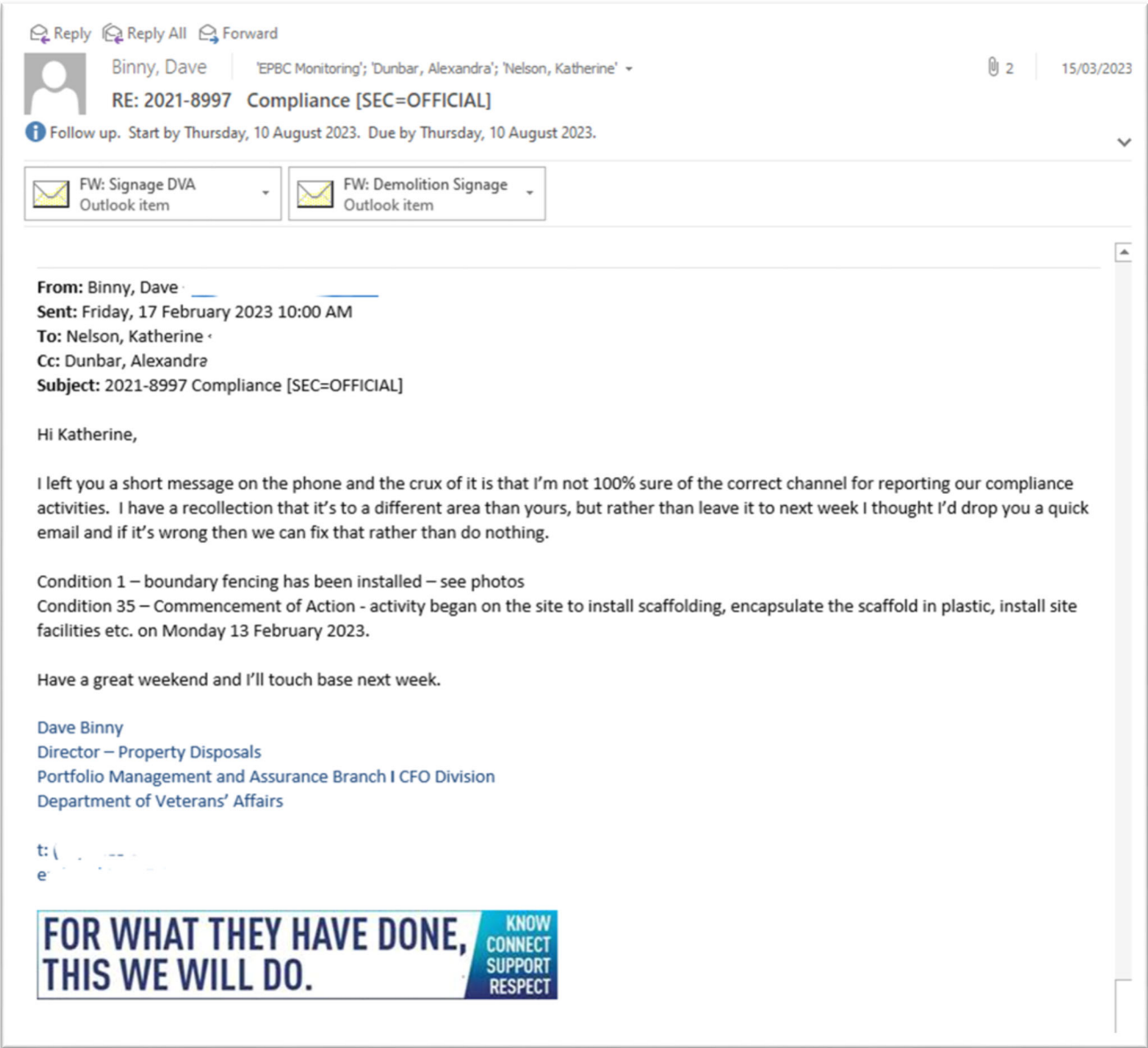


Figure 40. EMAIL CLARIFYING REQUIREMENTS

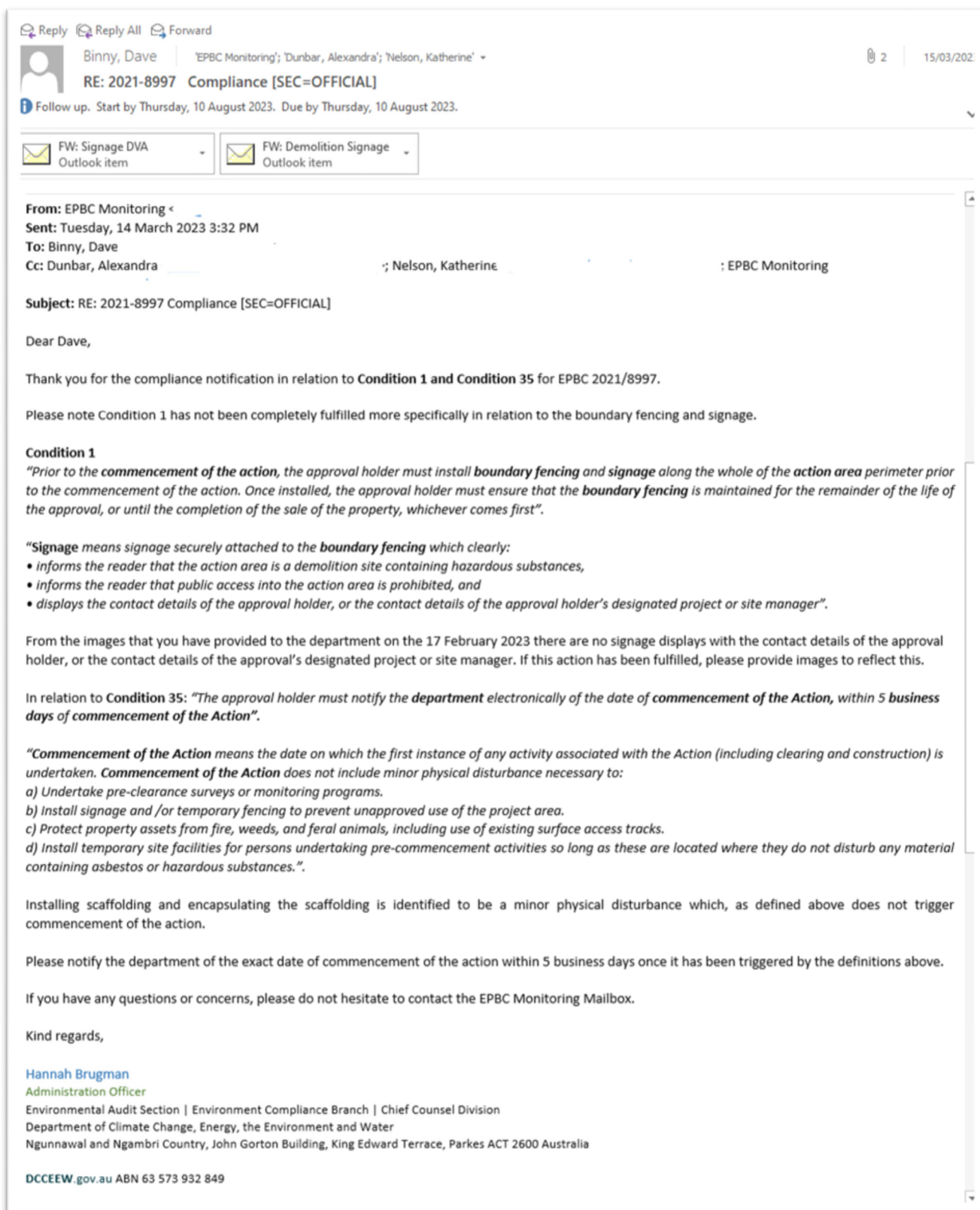


Figure 41. EXPLANATORY EMAIL CONFIRMING COMMENCEMENT OF ACTION



5.36 Condition 36

*If the **Commencement of the Action** does not occur within 5 years from the date of this approval, then the approval holder must not **Commence the Action** without the prior written agreement of the **Minister**.*

Not Applicable

This condition is **not applicable** as the action commenced on 13 February 2023 as evidenced by the emails listed below:

- First an email informing the Department of the commencement of action (See Figure 39 *Commencement of action notification* p.70)
- A response from the Department's monitoring team clarifying the requirements of Condition 35 (see Figure 40 *Email clarifying requirements* p.71)
- A follow up email confirming commencement of action with an explanation of the work undertaken meeting the definition of "commencement of action" (See Figure 41 *Explanatory email confirming commencement of action* p.72)

5.37 Condition 37

The approval holder must maintain accurate and complete compliance records.

Compliant

Compliance records are stored in DVA's records management system, *HPE Content Manager in container 2005989*. See Figure 42 on p.74.

5.38 Condition 38

*If the **Department** makes a request in writing, the approval holder must provide electronic copies of **Compliance records** to the **Department** within the timeframe specified in the request.*

*Note: **Compliance records** may be subject to audit by the **Department**, or by an **Independent auditor** in accordance with section 458 of the EPBC Act, and/or be used to verify compliance with the conditions. Summaries of the results of an audit may be published on the **Department's Website** or through the general media.*

Not Applicable as at the end of the reporting period.

The Department has not made any request for compliance records as at reporting date, therefore this condition is not applicable.

5.39 Condition 39

*The approval holder must ensure that any **Monitoring data**, surveys, maps, and other spatial and metadata required under the conditions of this approval are prepared in accordance with the **Department's Guide to providing maps and boundary data for EPBC Act projects** (2021), or as otherwise specified by the **Minister** in writing.*

Compliant

Maps are provided in pdf format consistent with S4.2, p.29 of Attachment 16, the guide to providing maps and boundary data for EPBC projects.

The action area is in suburban Brisbane and its location is therefore very well understood by conventional means without ambiguity.

5.40 Condition 40

*The approval holder must retain all **Monitoring data**, surveys, maps, other spatial and metadata, electronically.*

Compliant

DVA's corporate records management system is *HPE Content Manager*. The Primary and Secondary data centres storing this data are maintained by Services Australia in a high availability array facilitating seamless switchover to the secondary (backup) data centre should connectivity to the primary data centre be lost.

2459 records regarding the Greenslopes site are stored in container 2005989 (see Figure 42 on p.74)

Figure 42. SCREEN SHOT OF THE "GREENSLOPES" CONTAINER SHOWING 2459 RELEVANT ELECTRONIC RECORDS

Record Type	Record Number	Title	Date Registered	Last Action Date	Container
ELECTRON...	23265662E	Greenslopes - Remediation - Interim Visual Clearance - Main Building Interior - 13 Mar 2023	14/03/2023 at 10:25 AM	14/03/2023 at 10:25 AM	2005989
ELECTRON...	23265637E	Greenslopes - Remediation - Interim Visual Clearance - Main Building Interior - 13 Mar 2023	14/03/2023 at 10:21 AM	14/03/2023 at 10:21 AM	2005989
ELECTRON...	23227875E	Greenslopes - Remediation - Interim Visual Clearance - Main Building Interior - 6 Mar 2023	7/03/2023 at 10:36 AM	7/03/2023 at 10:36 AM	2005989
ELECTRON...	23265534E	Greenslopes - Remediation - Interim Visual Clearance - Main Building Interior - 8 Mar 2023	14/03/2023 at 10:05 AM	14/03/2023 at 10:05 AM	2005989
ELECTRON...	23462969E	Greenslopes - Remediation - Interim Visual Clearance - Main Hall - Internal Area Adjacent Timber Cladding - 3 May 2...	5/05/2023 at 3:20 PM	5/05/2023 at 3:20 PM	2005989
ELECTRON...	23353810E	Greenslopes - Remediation - Interim Visual Clearance - Main Hall Lower Roof North - 28 Mar 2023	4/04/2023 at 12:42 PM	4/04/2023 at 12:42 PM	2005989
ELECTRON...	23353804E	Greenslopes - Remediation - Interim Visual Clearance - Main Hall Lower Roof South - 28 Mar 2023	4/04/2023 at 12:40 PM	4/04/2023 at 12:40 PM	2005989
ELECTRON...	231600040E	Greenslopes - Remediation - Interim Visual Clearance - Northern Boundary Line, Posi-track and Excavator Plants - 14 ...	18/12/2023 at 11:40 AM	18/12/2023 at 11:40 AM	2005989
ELECTRON...	231211847E	Greenslopes - Remediation - Items raised from Coffey Enviro-Pacific site meeting - 28 Aug 2023	21/09/2023 at 4:01 PM	21/09/2023 at 4:01 PM	2005989
ELECTRON...	231146679E	Greenslopes - Remediation - Items raised from DVA site meeting - Enviro-Pacific to Coffey - 28 Aug 2023	8/09/2023 at 3:27 PM	8/09/2023 at 4:43 PM	2005989
ELECTRON...	231145919E	Greenslopes - Remediation - Items raised from DVA site meeting - Enviro-Pacific to Coffey - 28 Aug 2023	8/09/2023 at 2:22 PM	8/09/2023 at 4:43 PM	2005989
ELECTRON...	22930504E	Greenslopes - Remediation - Iad report re internal window trim asbestos free - 11 Nov 2022	16/12/2022 at 10:37 AM	16/12/2022 at 10:37 AM	2005989
ELECTRON...	23265747E	Greenslopes - Remediation - Lead Clearance Certificate - 14 Mar 2023	14/03/2023 at 10:36 AM	14/03/2023 at 10:36 AM	2005989
ELECTRON...	23307729E	Greenslopes - Remediation - Lead Clearance Certificate - 17 Mar 2023	22/03/2023 at 3:59 PM	22/03/2023 at 3:59 PM	2005989
ELECTRON...	23423853E	Greenslopes - Remediation - Lead Clearance Certificate - 20 Apr 2023	26/04/2023 at 12:01 PM	26/04/2023 at 12:01 PM	2005989
ELECTRON...	231004373E	Greenslopes - Remediation - Lead Clearance Certificate - 28 July 2023	8/08/2023 at 2:27 PM	8/08/2023 at 2:27 PM	2005989
ELECTRON...	23462971E	Greenslopes - Remediation - Lead Clearance Certificate - 3 May 2023	5/05/2023 at 3:21 PM	5/05/2023 at 3:28 PM	2005989
ELECTRON...	23265506E	Greenslopes - Remediation - Lead Clearance Certificate - 6 Mar 2023	14/03/2023 at 10:00 AM	14/03/2023 at 10:00 AM	2005989
ELECTRON...	23803922E	Greenslopes - Remediation - Lead Clearance Certificate - Accommodation Building - 19 June 2023	29/06/2023 at 9:21 AM	29/06/2023 at 10:01 AM	2005989
ELECTRON...	23803927E	Greenslopes - Remediation - Lead Clearance Certificate - Accommodation Building pt.2 - 19 June 2023	29/06/2023 at 9:21 AM	29/06/2023 at 9:21 AM	2005989
ELECTRON...	23505392E	Greenslopes - Remediation - Lead Clearance Certificate - Accommodation Building - External East Elevation - 16 May 2...	16/05/2023 at 5:15 PM	16/05/2023 at 5:15 PM	2005989
ELECTRON...	23614001E	Greenslopes - Remediation - Lead Clearance Certificate - Accommodation Building - North and South Elevations - 25 ...	9/06/2023 at 9:56 AM	9/06/2023 at 10:15 AM	2005989
ELECTRON...	23502319E	Greenslopes - Remediation - Lead Clearance Certificate - Main Hall - Lead paint impacted timber - 8 May 2023	16/05/2023 at 11:10 AM	16/05/2023 at 11:10 AM	2005989
ELECTRON...	22533438E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 1 Sep 22	15/09/2022 at 4:10 PM	15/09/2022 at 4:10 PM	2005989
ELECTRON...	222533713E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 12 Sep 22	15/09/2022 at 4:38 PM	15/09/2022 at 4:38 PM	2005989
ELECTRON...	222533703E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 12 Sep 22	15/09/2022 at 4:36 PM	15/09/2022 at 4:36 PM	2005989
ELECTRON...	222533774E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 13 Sep 22	15/09/2022 at 4:45 PM	15/09/2022 at 4:45 PM	2005989
ELECTRON...	222533781E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 14 Sep 22	15/09/2022 at 4:47 PM	15/09/2022 at 4:47 PM	2005989
ELECTRON...	222533276E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 15 Aug 22	15/09/2022 at 3:55 PM	15/09/2022 at 3:55 PM	2005989
ELECTRON...	222536859E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 15 Sep 22	16/09/2022 at 1:23 PM	16/09/2022 at 1:23 PM	2005989
ELECTRON...	222533302E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 16 Aug 22	15/09/2022 at 3:57 PM	15/09/2022 at 3:57 PM	2005989
ELECTRON...	222619883E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 16 Sep 22	10/10/2022 at 11:12 AM	10/10/2022 at 11:12 AM	2005989
ELECTRON...	222533056E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 17 Aug 22	15/09/2022 at 3:47 PM	15/09/2022 at 3:47 PM	2005989
ELECTRON...	222533125E	Greenslopes - Remediation - Make Safe - Air Monitoring - Asbestos - 18 Aug 22	15/09/2022 at 3:49 PM	15/09/2022 at 3:49 PM	2005989

5.41 Condition 41

*The approval holder must submit electronically to the **Department** all requested **Monitoring data**, surveys, maps, other spatial and metadata, within 14 business days of the date of request.*

Compliant

No requests for such data were made in the reporting period.

5.42 Condition 42

*The approval holder must prepare a **Compliance report** for each 12-month period following the date of this approval, until the completion of the action, or as otherwise agreed to in writing by the **Minister**.*

Compliant

This document is the first compliance report covering the period 3 February 2023 – 2 February 2024.

The next Compliance report is due to be published on 3 May 2025 for the period 3 February 2024 – 2 February 2025

5.43 Condition 43

*Each **Compliance report** must be consistent with the **Department’s Annual Compliance report Guidelines** (2014).*

Compliant

This report has been prepared in accordance with Attachment 11 – Annual Compliance Report Guidelines.

5.43.1 Format

This subsection deals with the “Format of the Annual Compliance Report” (see Attachment 11 – Annual Compliance Report Guidelines, pp. 6-7)

Table 4. ANNUAL COMPLIANCE REPORT FORMAT REQUIREMENTS

Requirement	Compliance	Evidence
General		
Each page of the Annual Compliance Report must include the EPBC approval number, the name of the project, the date of the report and sequential page numbering.	compliant	<ul style="list-style-type: none">• EPBC approval number, the name of the project, the date of the report included in header• Sequential page numbering included in footer

Reports are to be submitted to the department via email to epbcmonitoring@dcceew.gov.au . If your report exceeds the allowable size for email attachments, please contact the department at the above email to arrange an alternate submission method.	compliant	<ul style="list-style-type: none"> • Arrangements made to use Australian Government Macquarie SigBox file transfer service
Submissions must be titled 'Annual Compliance Report' with the project name and EPBC approval number. The time period of the report must be clearly stated (e.g., 10 October 2023 to 9 October 2024).	Compliant	<ul style="list-style-type: none"> • All requirements included in title page
Digital requirements		
The department uses an electronic document management system. The complete report (text, figures, and appendices) must be supplied as an Adobe Acrobat PDF file. At a minimum, the PDF document is to be bookmarked to the major components (e.g., contents, main report, and appendices).	compliant	<ul style="list-style-type: none"> • Report and attachments bookmarked to main components where possible
Where this is not possible, the department will accept individual components in common formats.	compliant	<ul style="list-style-type: none"> • Majority of report and appendices in pdf format • However some large data tables in the CLID are in excel format to improve user experience.
Where individual digital components are supplied, please provide a file list and the corresponding report reference.	compliant	<ul style="list-style-type: none"> • File list supplied at section 2.1 <i>File List</i> (p.6) • Attachments are referenced in this document by either attachment number or number and title. Where relevant page numbers are also referenced.
Electronic data will be accepted via email or via online storage services with prior arrangement.	Compliant	<ul style="list-style-type: none"> • Online storage service transfer arranged 15/5/24
Revised reports		
The department may request that an Annual Compliance Report be revised and resubmitted. A resubmitted report must be accompanied by an electronic copy of the document showing tracked changes from the previous report.	Not Applicable	<ul style="list-style-type: none"> • The Department has not requested a revision

Requirements for maps, plans and attachments		
Scale – An appropriate standard metric scale must be chosen to best represent the information required (e.g., 1:25 000, 1:10 000 and 1:5000).	compliant	<ul style="list-style-type: none"> Appropriate metric scale used in all plans with the exception of any facsimiles of historical maps or plans included for heritage purposes
Datum – Plans and cross sections must refer to Australian Height Datum	compliant	<ul style="list-style-type: none"> AHD used for plans and cross sections
Title Block – Plans must have a title block in the lower right-hand corner of the sheet with the following information: <ul style="list-style-type: none"> EPBC number and project name title and number of the plan author scale date. 	(mostly) compliant	<ul style="list-style-type: none"> EPBC # and exact project name missing from plans created by 3rd parties (often these were created before the approval was granted and this requirement became known)
Legend – Plans must have a clear and comprehensive legend to identify the symbols and colours used.	compliant	<ul style="list-style-type: none"> Legends are clear
Maps, plans, figures, images, and attachments must: <ul style="list-style-type: none"> use metric measurements throughout show a graphic bar scale show any local grid lines and standards have a north point or orientation of sections include a key. 	compliant	<ul style="list-style-type: none"> In some cases facsimiles of historical documents may predate the transition to metric measurement
Delivery address		
Compliance reports must be titled 'Annual Compliance Report' with the project name and EPBC approval number, clearly labelled beneath the title.	Compliant	<ul style="list-style-type: none"> All requirements included in title page
Annual Compliance Reports must be forwarded to epbmonitoring@dcceew.gov.au .	Compliant	<ul style="list-style-type: none"> Superseded by file transfer due to size

5.43.2 Content

This subsection deals with the “Content of the Annual Compliance Report” (see Attachment 11 – Annual Compliance Report Guidelines, pp. 8-12)

Table 5. ANNUAL COMPLIANCE REPORT FORMAT REQUIREMENTS

Requirement	Compliance	Evidence
Declaration of Accuracy		
The declaration ... must be attached to the compliance report and signed by the approval holder.	Compliant	<ul style="list-style-type: none"> See section 8 <i>Declaration of accuracy</i> (p.93)
Document version control		
The document version control system must be a simple system for ensuring version control and documenting details of key changes to the document over time. It must identify changes and include details of timing, people responsible, and reasons for those changes.	Compliant	<ul style="list-style-type: none"> See section 7 Document Version Control (p.92)
Table of contents		
<p>The table of contents must contain:</p> <ul style="list-style-type: none"> all section headings and page numbers all figures, tables, plans and maps (which must be numbered) all appendices (with meaningful titles, including sub-appendices if any); if appendices contain a collation of data, include a summary of the contents. 	Compliant	<ul style="list-style-type: none"> see section 1 <i>Table of Contents</i> (p.2)
Description of activities		
The description of activities section must contain a description of the approved action and details of the current activities undertaken during the period covered by the report.	Compliant	<ul style="list-style-type: none"> See section 4 Description of Action (p.23)
<p>The compliance report must clearly identify:</p> <ul style="list-style-type: none"> EPBC number project name approval holder and ACN or ABN the approved action location of the project person accepting responsibility for the report – signed declaration dates for the reporting period of the report date of preparation of the report. 	Compliant	<ul style="list-style-type: none"> all elements included in this report

Addressing all approval conditions		
<p>The compliance report must:</p> <ul style="list-style-type: none"> demonstrate all conditions of the EPBC approval have been considered and addressed. List the conditions of the EPBC approval, including any variations to those conditions, noting if compliance or non-compliance with each condition has been achieved. If a management plan is required under an approval condition: the specifics in a management plan that support an approval condition must be <ul style="list-style-type: none"> detailed in the compliance report; and material must be provided demonstrating that the requirements of that plan have been implemented. 	Compliant	<ul style="list-style-type: none"> All conditions addressed - see <i>Table 1 Summary of Conditions</i> (p.8) Requirements of the RAP addressed at section 5.20.1 <i>Requirements of the RAP</i> (p.56)
EPBC approval conditions and the compliance table		
<p>As part of every compliance report, a conditions compliance table in a similar format to that in Appendix A is required. The table must include:</p> <ul style="list-style-type: none"> Condition number and reference. Full wording of the condition as per the EPBC approval. Designation regarding compliance or non-compliance. Summary of evidence to support the compliance designation. Any references to any other parts of the compliance report that may relate to that approval condition. The report must include a clear statement that operations were, or were not, compliant with the EPBC conditions of approval, which must be supported by a summary of evidence clearly demonstrating the conclusion that compliance with the condition was (or was not) met. Supporting data such as flora and fauna surveys, photograph monitoring and groundwater monitoring data must be provided as appendices. 	Compliant	<ul style="list-style-type: none"> See <i>Table 1 Summary of Conditions</i> (p.8)

Designations to record findings		
<p>The following designations must be used to record findings in compliance reports:</p> <ul style="list-style-type: none"> • Compliant - 'Compliance' is achieved when all the requirements of a condition have been met, including the implementation of management plans or other measures required by those conditions. • Non-compliant - A designation of 'non-compliant' must be given where the requirements of a condition or elements of a condition, including the implementation of management plans and other measures, have not been met. • Not applicable - A designation of 'not applicable' must be given where the requirements of a condition or elements of a condition fall outside of the scope of the current reporting period. For example, a condition that applies to an activity that has not yet commenced. 	Compliant	<ul style="list-style-type: none"> • See <i>Table 1 Summary of Conditions</i> (p.8) • See sections <i>5.1 Condition 1</i> (p.25) to <i>5.54 Condition 54</i> (p.86).
Correcting non-compliances		
<p>Findings of non-compliance must be accompanied by a summary detailing any corrective measures taken and include:</p> <ul style="list-style-type: none"> • if the department was notified of the non-compliance and, if so, when, and how and to whom. • The relevant condition number and reference. • Who detected the non-compliance. • Date when the non-compliance was detected. • How the non-compliance was/will be corrected. • Who (the actual person completing the correction) was/is responsible for correcting the noncompliance. • Date when correction measures were/will be commenced and/or completed or the time frame for correction. 	compliant	<ul style="list-style-type: none"> • All non-compliance reported and corrected • See section <i>5.19 Condition 19</i> (p.53) • See section <i>5.33 Condition 33</i> (p.67)

<ul style="list-style-type: none"> What measures have been/ will be taken to avoid recurrence. 		
Instances of non-compliance included in previous compliance reports not fully corrected at the end of the reporting period must have a progress update in the subsequent report and an assessment of the effectiveness of the measures taken.	Not Applicable	<ul style="list-style-type: none"> This report covers the first reporting period (see Attachment 5 – Notification of Decision)
New environmental risks		
The compliance report must discuss any new environmental risks that have become apparent during the reporting period. New environmental risks may include new pests or diseases, new information on groundwater levels, unexpected erosion etc. If new risks are identified, there must be a risk analysis and reporting. A commitment to revise the appropriate management plan (if required) must be included in the compliance report.	Not Applicable	<ul style="list-style-type: none"> No new environmental risks became apparent during the reporting period
Other information		
Any additional monitoring information or environmental research relevant to the EPBC approval and approval conditions can be included in the relevant section or appended to the compliance report. Appendices can be attached to support reporting against the EPBC approval conditions. Colour photographs and/or aerial photography can provide an excellent time record of the operation and should be included. Any additional information such as supporting documentation, consultant studies and reports must be appended.	compliant	<ul style="list-style-type: none"> Attachments contain additional reference data and monitoring information.

5.44 Condition 44

*Each **Compliance report** must include:*

- a) *Accurate and complete details of compliance and any non-compliance with the conditions and the **Plans**, and any **Incidents**.*
- b) *A schedule of all **Plans** in existence in relation to these conditions and accurate and complete details of how each **Plan** is being implemented.*

Compliant

Accurate and complete details of compliance and any non-compliance with the conditions is in section 5 *Supporting Evidence* (p.25). Compliance with the Remediation Action Plan is in section 5.20.1 *Requirements of the RAP* (p.56).

There were no incidents.

Non-compliance with conditions has been recorded at sections 5.19 *Condition 19* (p.53) and 5.33 *Condition 33* (p.67).

Schedule of Plans at section 2.2 Schedule of Plans (p.7).

5.45 Condition 45

The approval holder must:

- a) Publish each **Compliance report** on the **Website** within 60 business days following the end of the 12-month period for which that **Compliance report** is required.
- b) Notify the **Department** electronically, within 5 business days of the date of publication that a **Compliance report** has been published on the **Website**.
- c) Provide the weblink for the **Compliance report** in the notification to the **Department**.
- d) Keep all published compliance reports required by these conditions on the **Website** until the expiry date of this approval or completion of the action, whichever is first.

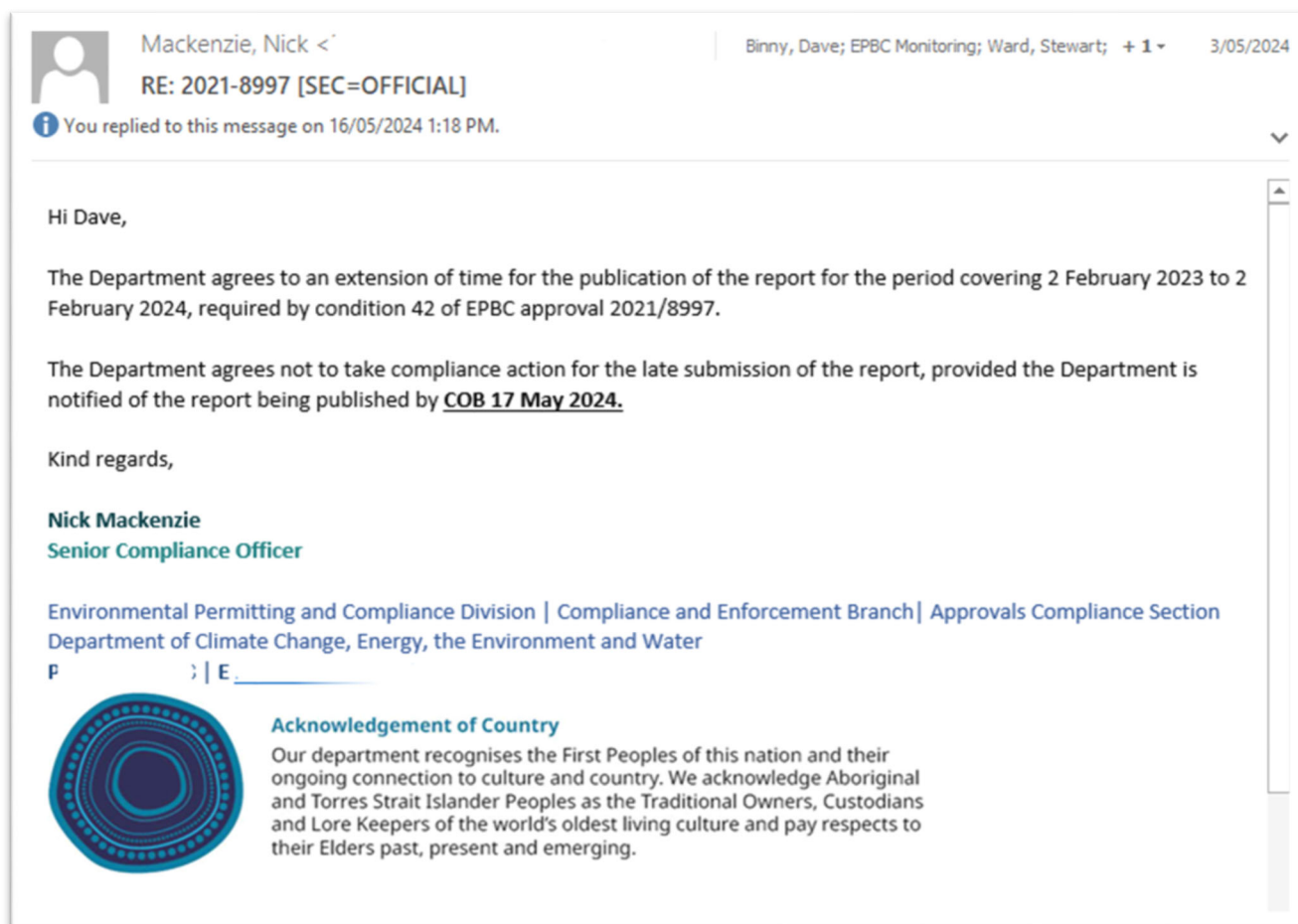
*Note: Compliance reports may be published on the **Department's Website**.*

Compliant

Annual Compliance Report published on the DVA website on 17 May 2024 in compliance with the extensions granted until that date (see Figure 43 on p.83).

Link to website is [Greenslopes Remediation | Department of Veterans' Affairs \(dva.gov.au\)](https://www.dva.gov.au/greenslopes-remediation).

Figure 43. EMAIL GRANTING EXTENSION FOR PUBLICATION OF COMPLIANCE REPORT



5.46 Condition 46

*The approval holder must notify the **Department** electronically, within 2 business days of becoming aware of any **Incident** and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a **Plan**.*

Compliant

No incidents occurred during the reporting period.

Two non-compliance issues were identified. In both cases the non-compliance was reported within 2 days of becoming aware of the non-compliance. See section 5.19 Condition 19 (p.53) and section 5.33 Condition 33 (p.67) for details of non-compliance reporting.

5.47 Condition 47

The approval holder must specify in the notification:

- a) Any condition or commitment made in a **Plan** which has been or may have been breached.

b) A short description of the **Incident** and/or potential non-compliance and/or actual non-compliance.

c) The location (including co-ordinates), date, and time of the **Incident** and/or potential non-compliance and/or actual non-compliance.

Note: If the exact information cannot be provided, the approval holder must provide the best information available

Compliant

No conditions in a plan have been breached.

No incidents occurred during the reporting period.

Non-compliance was restricted to administrative breaches only.

5.48 Condition 48

*The approval holder must provide to the **Department** in writing, within 12 business days of becoming aware of any **Incident** and/or potential non-compliance and/or actual non-compliance, the details of that **Incident** and/or potential non-compliance and/or actual non-compliance with the conditions or commitments made in a **Plan**. The approval holder must specify:*

a) Any corrective action or investigation which the approval holder has already taken

b) The potential impacts of the **Incident** and/or non-compliance and/or non-compliance

c) The method and timing of any corrective action that will be undertaken by the approval holder.

Compliant

No incidents occurred during the reporting period.

Non-compliance corrective action was taken immediately upon becoming aware of the non-compliance and reported in writing in the notifications to the department of the non-compliance.

See section 5.19 Condition 19 (p.53) and 5.33 Condition 33 (p.67) for details of notifications.

5.49 Condition 49

*The approval holder must ensure that an **Independent audit** of compliance with the conditions is conducted for every five-year period following the **Commencement of the Action** until this approval expires, unless otherwise specified in writing by the **Minister**.*

Not Applicable

Commencement of the action was on 13 February 2023, therefore the first independent audit report is for the period 13 February 2023 – 12 February 2028.

5.50 Condition 50

*For each **Independent audit**, the approval holder must:*

- a) Provide the name and qualifications of the nominated **Independent auditor**, the draft audit criteria, and proposed timeframe for submitting the **Audit report** to the **Department** prior to commencing the **Independent audit**.*
- b) Only commence the **Independent audit** once the nominated **Independent auditor**, audit criteria and timeframe for submitting the **Audit report** have been approved in writing by the **Department**.*
- c) Submit the **Audit report** to the **Department** for approval within the timeframe specified and approved in writing by the **Department**.*
- d) Publish each **Audit report** on the **Website** within 15 business days of the date of the **Department's** approval of the audit report.*
- e) Keep every **Audit report** published on the **Website** until this approval expires.*

Not Applicable

Commencement of the action was on 13 February 2023, therefore the first independent audit report is for the period 13 February 2023 – 12 February 2028.

5.51 Condition 51

*Each **Audit report** must report for the five-year period preceding that audit report.*

Not Applicable

Commencement of the action was on 13 February 2023, therefore the first independent audit report is for the period 13 February 2023 – 12 February 2028.

5.52 Condition 52

*Each **Audit report** must be completed to the satisfaction of the **Minister** and be consistent with the **Department's** Environment Protection and Biodiversity Conservation Act 1999 **Independent audit and Audit report Guidelines** (2019).*

Not Applicable

Commencement of the action was on 13 February 2023, therefore the first independent audit report is for the period 13 February 2023 – 12 February 2028.

5.53 Condition 53

*The approval holder must notify the **Department** electronically 60 business days prior to the expiry date of this approval, that the approval is due to expire.*

Not Applicable

The approval does not expire until 31 January 2042 (see Attachment 8 – Decision Notice).

5.54 Condition 54

*Within 20 business days after the completion of the Action, and, in any event, before this approval expires, the approval holder must notify the **Department** electronically of the date of **Completion of the Action** and provide completion data.*

Not Applicable

The action was not completed during the reporting period.

6 Definitions

In these conditions any bolded use of a word or term refers to the below definition of that word or term:

Action area means the location of the action, the whole of the property located across LOTS 123, 124 and 125 of RP46047, Greenslopes, Queensland, represented in Attachment A by the zone enclosed within the red line labelled '**Action area**'.

Air monitoring means the collection of air samples to assist in assessing the levels of airborne asbestos fibres present in either the asbestos removal area, or a worker's breathing zone.

Archaeological Finds Protocol means the **Archaeological Finds Protocol** which forms part of the Environmental Management **Plan** submitted as part of the preliminary documentation for the EPBC referral 2021/8997.

Asbestos means the asbestiform varieties of mineral silicates belonging to the serpentine or amphibole groups of rock forming minerals including actinolite asbestos, grunerite (or amosite) asbestos, anthophyllite asbestos, chrysotile asbestos, crocidolite asbestos, and tremolite asbestos.

Asbestos Containing Material means any material or thing that, as part of its design, contains asbestos. **Asbestos Containing Material** includes **Bonded Asbestos Containing Material** and friable **Asbestos Containing Material**.

Asbestos exposure standard means a **Respirable fibre** level of 0.1 fibres/mL of air measured in a person's breathing zone and expressed as a time-weighted average fibre concentration calculated over an eight-hour working day and measured over a minimum period of four hours in accordance with the **Membrane Filter Method Guidance Note**.

Asbestos Management Plan means a **Plan** that sets out how asbestos or **Asbestos Containing Material** that is identified at the workplace or site will be managed, for example what, when and how it is going to be done. The information that must be included in an **Asbestos Management Plan** is listed in Queensland Government How to Manage and Control Asbestos in the Workplace Code of Practice 2021.

Audit report means a written report of compliance and fulfilment of the conditions attached to this approval, objectively evaluated against the audit criteria approved by the **Department**.

Bonded Asbestos Containing Material means material containing asbestos that is not friable, including material containing asbestos fibres reinforced with a bonding compound.

Boundary fencing means a barrier, to exclude public access into the **Action area**.

Business day means a day that is not a Saturday, a Sunday or a public holiday in the state or territory of the Action.

Commence the Action or **Commencement of the Action** means the date on which the first instance of any activity associated with the Action (including clearing and construction) is undertaken. **Commencement of the Action** does not include minor physical disturbance necessary to:

- a) Undertake pre-clearance surveys or monitoring programs.
- b) Install **Signage** and /or temporary fencing to prevent unapproved use of the project area.

- c) *Protect property assets from fire, weeds, and feral animals, including use of existing surface access tracks.*
- d) *Install temporary site facilities for persons undertaking pre-commencement activities so long as these are located where they do not disturb any material containing asbestos or hazardous substances.*

Completion data means an environmental report and spatial data clearly detailing how the conditions of this approval have been met. The **Department's** chosen format for spatial data is a **Shapefile**.

Completion of the Action means the date on which all activities associated with this approval have permanently ceased and/or been completed.

Compliance records means all documentation or other material in whatever form required to demonstrate compliance with the conditions of approval in the approval holder's possession, or that are within the approval holder's power to obtain lawfully.

Compliance report means a written report of compliance with, and fulfilment of, the conditions attached to the approval.

Contaminated Land Auditor means an auditor approved by the Queensland Government, engaged to **Independently** evaluate the contaminated land investigation document prepared by **Suitably qualified persons** and certify the document when it meets the regulatory requirements.

Contaminated land investigation documentation means contaminated land reports (including site investigation reports, site risk assessments, Sampling Analysis Quality **Plans**, remediation action **Plans**, remediation and validation reports, etc) prepared in accordance with, for example, the National Environment Protection (Assessment of site contamination) Measure 1999 (amended May 2013), the Queensland auditor handbook for contaminated land (DES 2018). All contaminated site data should be provided in ESdat compatible formats (for example, as EDIF files).

Demolition stage means the period between the first instance of **Demolition work** and the completion of all **Demolition work** within the Action area as part of this Action.

Demolition work means any work to demolish, deconstruct or dismantle a structure, or part of a structure that is load-bearing or otherwise related to the physical integrity of the structure.

Demolition work does not include the dismantling of formwork, falsework, or other structures designed or used to provide support, access or containment during construction work; or removal of power, light or telecommunication poles.

Demolition work codes of practice means the Code of Practice: Demolition work, Safe Work Australia 2018, and the Code of Practice: Demolition Work, Queensland Government 2021.

Department means the Australian Government agency responsible for administering the EPBC Act.

EPBC Act means the Environment Protection and Biodiversity Conservation Act 1999 (Cth).

EPBC Regulations means the Environment Protection and Biodiversity Conservation Regulations 2000 (Cth).

ERA 57 means the Environmentally Relevant Activity Standard: **Regulated waste** transport (ERA 57) – Version 2, Queensland Government 2019.

Excavation work means work to make an excavation and to fill or partly fill an excavation.

Excavation work codes of practice means the model Code of Practice: Excavation work, Safe Work Australia 2018, and the Code of Practice: Excavation Work, Queensland Government 2021.

Friable Asbestos Containing Material means material that is in a powder form or that can be crumbled, pulverised or reduced to a powder by hand pressure when dry, and contains asbestos.

Gate and brick facade structures means gate and property entrance structures which have been identified by the **Heritage Impact Assessment**, prepared by Catalyst Heritage Consultants, 14 September 2020, as holding heritage value.

Hazardous substances means a substance that may pose a risk to human health or the environment. For example, arsenic, asbestos, lead, PCBs, dichloro-diphenyl-trichloroethane (DDT) or oil.

Heritage Impact Assessment means the Former Australian Red Cross Centre, Greenslopes, Queensland **Heritage Impact Assessment** report, prepared by Catalyst Heritage Architects, 14 September 2020, submitted as part of the preliminary documentation for the EPBC referral 2021/8997.

Heritage Interpretative Strategy means the Former Australian Red Cross Centre, Greenslopes, Queensland **Heritage Interpretation Strategy** report, prepared by Catalyst Heritage Architects, 22 January 2022, submitted as part of the preliminary documentation for the EPBC referral 2021/8997.

How to Manage and Control Asbestos codes of practice means the Code of Practice: Model Code of Practice: How to manage and control asbestos in the workplace, Safe Work Australia 2020, and the Code of Practice: How to manage and control asbestos in the workplace, Queensland Government 2021.

How to Safely Remove Asbestos codes of practice means the Code of Practice: How to safely remove asbestos, Safe Work Australia 2020, and the Code of Practice: How to safely remove asbestos, Queensland Government 2021.

Incident means any event which has the potential to, or does, impact on any protected matter.

Independent means a person or firm who does not have any individual, financial*, employment* or family affiliation or any conflicting interests with the project, the approval holder or the approval holder's staff, representatives, or associated persons.

*Other than for the purpose of undertaking the role for which an **Independent** person is required

Independent audit means an audit conducted by an **Independent** and **Suitably qualified person** as detailed in the Environment Protection and Biodiversity Conservation Act 1999 **Independent audit and Audit report Guidelines** (2019).

Licensed asbestos assessor means a person who holds a class A asbestos assessor licence issued under the Work Health and Safety Regulation 2011 (Qld).

Membrane Filter Method Guidance Note means the Guidance Note on The Membrane Filter Method For Estimating Airborne Asbestos Fibres - 2nd edition, Commonwealth of Australia 2005.

Minister means the Australian Government **Minister administering the EPBC Act**, including any delegate thereof.

Monitoring data means the data required to be recorded under the conditions of this approval.

Plan means any action management **Plan** or strategy that the approval holder is required by these conditions to implement.

Regulated waste means commercial waste or industrial waste of a type, or containing a constituent of a type, listed in Table 1 in Appendix 1 (taken from Schedule 9, Part 1, Column 1 of the Queensland EP Regulation 2). This table includes the default category of **Regulated waste** (category 1 or category 2).

Remediation and validation phase means the period between the first instance of **Remediation and validation works** and the completion of all **Remediation and validation works** within the Action area.

Remediation and validation works means any work to remediate a site that is contamination or the process to evaluating the performance of any clean-up chosen as a remedial option.

Remediation and validation works includes:

- restoration of the site to the state suitable for all future land uses,
- the restriction, or prohibition, of access to, or use of, the site,
- the removal, destruction, reduction, containment, or dispersal of the substance causing the contamination,
- the reduction or mitigation of the effect of the substance, and
- the protection of human health, the environment, or any environmental value from the contamination.

Respirable fibre means any fibre that is less than 3 micrometres (μm) wide, is more than 5 micrometres (μm) long, and has a length to width ratio of more than 3:1.

Shapefile(s) means location and attribute information about the Action provided in an Esri **Shapefile** format. **Shapefiles** must contain '.shp', '.shx', '.dbf' files and a '.prj' file that specifies the projection/geographic coordinate system used. **Shapefiles** must also include an '.xml' metadata file that describes the **Shapefile** for discovery and identification purposes.

Signage means **Signage** securely attached to the **Boundary fencing** which clearly:

- informs the reader that the **Action area** is a demolition site containing hazardous substances,
- informs the reader that public access into the **Action area** is prohibited, and
- displays the contact details of the approval holder, or the contact details of the approval holder's designated project or site manager.

Suitably qualified person means a person who has professional qualifications, training, skills and/or experience related to the nominated subject matter and can give authoritative **Independent** assessment, advice and analysis on performance relative to the subject matter using the relevant protocols, standards, methods and/or literature. A **Suitably qualified person** must have qualifications and experience relevant to the work being undertaken and must be a current member of a professional organisation prescribed under Schedule 14 of the Environmental Protection Regulation 2008 (Qld).

Website means a set of related web pages located under a single domain name attributed to the approval holder and available to the public.

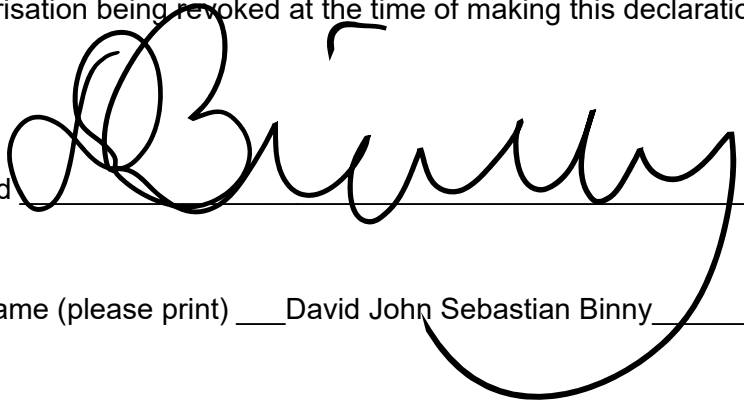
7 Document Version Control

Version	Date	Updates	Author
1.0	1/5/23	Initial Draft	Dave Binny
1.1	16/5/23	Final Draft for submission	Dave Binny

8 Declaration of accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed



Full name (please print) ___David John Sebastian Binny___

Position (please print) Director – Property Operations and Sustainability

Organisation (please print including ABN/ACN if applicable) Department of Veterans' Affairs (ABN 23 964 290 824)

Date ___17___/___5___/___2024