



Association for Christian Education Inc.

**Rehoboth Christian College – Kenwick
Annual Compliance Report –
Ministerial Statement 780**

19 January 2018

Natural Area Holdings Pty Ltd
99C Lord Street, Whiteman, WA, 6076
Ph: (08) 9209 2767
info@naturalarea.com.au
www.naturalarea.com.au



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Document Title	2018 01 15 NAC RCC REPT RCC - 2018 Annual Compliance Report.docx				
Location	\\10.0.0.210\DropBox\Drop Box\Client Folders - NAC\Rehoboth Christian College\Lot 107 Kenwick Road\EPA Documents and Correspondance\Annual Compliance Report\2018 Annual Compliance Report\				
Draft/ Version No.	Date	Changes	Prepared by	Approved by	Status
D1	15 January 2018	New document	SB	LS	Draft for client review
V1		Signature	SB	LS	Final

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1.0 Introduction

The Association for Christian Education Inc. owns and operates the Rehoboth Christian College at 92 Kenwick Road, Kenwick, within the City of Gosnells (Figure 1). A referral describing proposed extensions to the school was submitted to the EPA under Part IV of the *Environmental Protection Act 1986 (WA)* due to the potential impacts on flora and wetlands within the school boundary. The EPA issued Bulletin 1249 in March 2007 indicating that the assessment level for the project was 'assessment on referral information' (ARI). The Office of the Environmental Protection Authority (OEPA) published Ministerial Statement 780 on 19 January 2009 indicating that the project could proceed.

Natural Area Holdings Pty Ltd, trading as Natural Area Consulting Management Services (Natural Area), was commissioned by Rehoboth Christian College on behalf of the proponent, Association for Christian Education Inc., to prepare this, the seventh Annual Compliance Report. It will report on the project for the period 20 January 2017 to 19 January 2018, and was submitted to the Office of the Environmental Protection Agency (OEPA) on 19 January 2018. It will provide information relating to compliance documented within the Ministerial Statement and proponent commitments audit tables, and outline work underway to progress Stage 2 of the expansion works that is expected to commence in early 2018 in a portion of Lot 107 and Lot 900 (previously Lot 105A) Brixton Street.

Phase 1 of the extension works involved the:

- development of 1.0 ha of land that was characterised as a conservation category wetland (CCW) that includes 0.60 ha of the threatened ecological community (TEC) claypan wetlands
- conservation management of 2.3 ha of two TECs in the remainder of the school lot, including:
 - full rehabilitation of 0.18 ha of TEC claypan wetlands
 - partial rehabilitation of 0.66 ha of TEC claypan wetlands
 - preparation of a series of management plans for wetland and drainage areas.

All works associated with Phase 1 were completed by December 2015 and documented in the January 2016 Annual Compliance Report prepared by Natural Area.

The Association for Christian Education is now progressing the development of the triangular area bounded by Brixton Street, Wanaping Road and the wetland area (Lot 900 and a portion of Lot 107), with preliminary works including site design and environmental works associated with ongoing management as per the Ministerial Statement. The original management plans prepared by BlueSands Environmental are in the process of being adjusted to include reference to Lot 900 along with updated drainage data and provide a completion date for groundwater quality monitoring activities post-construction.



Figure 1: Location
 Lots 107 and 900 Brixton Street, Kenwick

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N

Client: Rehoboth Christian College
 Project: Compliance Reporting
 Image Source: NearMap, 2015
 Prepared by: Sharon Hynes
 Datum: GDA 94, Zone 50

0 40

 Metres

2.0 Current Status

Stage 1 building commenced in February 2011 after the approval of the Wetland Rehabilitation Plan, the Wetland Management Plan and Drainage and Nutrient Management Plan in November 2010 (Sands, 2012, personal communication; OEPA, 2010, personal communication), and was completed later that year. Implementation of the wetland revegetation plan is complete, as are the requirements of the Drainage Management Plan and the Wetland Management Plan, each of which were specific to Lot 107 (Stage 1). Natural Area prepared the sixth Annual Environmental Compliance Report which was submitted to the OEPA on 19 January 2017.

Works associated with the development of Stage 2 that will occur in Lot 900 and a portion of Lot 107 have now commenced, with Natural Area overseeing all environmental works. Accordingly, during 2017 Natural Area has:

- provided some information to the Department of the Environment and Energy relating to ongoing management of the site and seeking advice in relation to the need for Commonwealth approvals associated with the claypan wetlands of the Swan Coastal Plain that were listed as matters of national environmental significance after State approval was given in 2009
- continued pre-development groundwater quality monitoring
- progressed adjustments to the management plans prepared by BlueSands Environmental to include reference to Lot 900
- liaised with Mapel Builders during the design process to ensure adequate consideration of environmental approval conditions, particularly in relation to drainage and protection of the conservation area during construction.

3.0 Compliance

The Association for Christian Education Inc. continues to comply with the conditions listed in Ministerial Statement 780 and the approved management plans. Evidence of this will be provided in the audit tables provided in Section 5.

3.1 Non-compliances and Non-conformances

According to the Environmental Protection Authority (2014), a non-compliance is a failure to meet requirements specified within the Ministerial Statement, while a non-conformance is any deviation from procedures, programs and/or management actions described in an environmental management plan. No non-compliances or non-conformances have occurred in the period 20 January 2017 – 19 January 2018.

3.2 Complaints Register

A complaints register has been prepared by Rehoboth Christian College and is kept at the front office. The complaints register includes the following provisions:

- date
- complainant
- contact details
- nature of the complaint
- response
- date of response.

No complaints have been received since the register was prepared in 2012.

3.3 Compliance Statement

This Annual Compliance Report provides verifiable evidence of compliance with required conditions outlined in Ministerial Statement 780 and endorsed actions and commitments outlined in proponent Management Plans. A Compliance Statement as per PAF Assessment Form 2 is provided in Appendix 1 of this document.

4.0 Environmental Monitoring and Research

During the period 20 January 2017 – 19 January 2018, environmental monitoring and research was limited to the pre-development groundwater monitoring activities that occurred after the installation of new monitoring bores. The College continues to undertake nutrient analysis of the ovals prior to fertilising, however, with results provided in Appendix 2.

4.1 Groundwater Quality Monitoring

Three groundwater monitoring bores were installed by Hyd₂O along the boundary between Lot 900 and the existing school site and the conservation category wetland (Figure 2) on 26 October 2016. The bores were sampled by Natural Area in May and December 2017 (Table 1, Certificates of Analysis provided in Appendix 3), noting that access to MB2 and MB3 was not possible in December 2017 due to rusted locks. These three sampling events represent the baseline conditions to which future results will be compared to.

Results of all parameters below recommended guideline levels listed in the ANZECC Fresh and Marine Water Quality Guidelines (ANZECC, 2000). Conductivity readings indicated that the water remained in the brackish range, and that suspended solids in MB3 were much higher than those in MB1 and MB2. Electrical conductivity readings indicated that the groundwater on site was within the brackish range.

Table 1: Pre-construction Groundwater Quality Result

Parameter	Units	22 Nov 2016			24 May 2017			15 Dec 2017		
		MB1	MB2	MB3	MB1	MB2	MB3	MB1	MB2	MB3
pH	pH units	8.05	7.86	7.23	8.03	7.88	7.40	7.77	NA	NA
Electrical conductivity (EC)	µS/cm	8740	3240	3400	8190	3710	4460	5910	NA	NA
Total suspended solids (TSS)	mg/L	15	6	10400	818	<5	18000	56	NA	NA
Alkalinity as CaCO ₃	mg/L	26	8	67	42	12	65	29	NA	NA
Aluminium	mg/L	<0.01	<0.01	0.16	<0.01	<0.01	<0.01	<0.01	NA	NA
Arsenic	mg/L	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	<0.001	NA	NA
Iron	mg/L	<0.05	<0.05	0.23	0.06	<0.05	<0.05	<0.05	NA	NA
Ammonia as N	mg/L	0.27	0.04	0.07	0.02	0.07	0.04	0.03	NA	NA
Nitrite as N	mg/L	<0.01	<0.01	<0.01	0.12	<0.01	<0.01	0.06	NA	NA
Nitrate as N	mg/L	<0.01	0.03	0.03	1.00	0.01	0.01	0.54	NA	NA
Nitrite + nitrate as N	mg/L	<0.01	0.03	0.03	1.12	0.01	0.01	0.60	NA	NA
Total Kjeldahl nitrogen	mg/L	1.0	0.4	<1.0	0.6	0.4	38.0	0.8	NA	NA
Total nitrogen as N	mg/L	1.0	0.4	<1.0	1.7	0.4	38.0	1.4	NA	NA
Total phosphorous	mg/L	0.02	<0.01	0.31	0.09	0.02	2.68	0.07	NA	NA



5.0 Stakeholder Engagement

In order to prepare the 2018 annual compliance report, Natural Area contacted two individuals, the details of which are summarised in Table 3.

Table 3: Stakeholder Engagement

Date	Name	Position	Organisation	Purpose	Outcome
2017	Rachael Fairlamb	Accountant	Rehoboth Christian College (Association for Christian Education Inc.)	Environmental matters relating to the development of Lot 900	Ongoing advice as required, input into various components associated with approvals.
	Mark Steyn	Chief Executive Officer			
January 2018	Rachael Fairlamb	Accountant		Evidence to support demonstration of compliance with Ministerial Statement 780 and proponent commitments for the project	Input into compliance report and final sign off
	Mark Steyn	Chief Executive Officer			Input into compliance report

6.0 Audit Tables

Two audit tables are applicable to the Rehoboth Christian College proposal, namely the Ministerial Statement Audit Table, and the audit table documenting compliance with proponent commitments. The school is in the process of implementing a new phase of development associated with Ministerial Statement 780 which will require adjustment to the environmental management plans initially prepared by BlueSands Environmental, with some conditions again becoming active as a result of the proposed construction while others are complete.

6.1 Ministerial Statement Audit Table

The Ministerial Statement Audit Table was prepared by the Office of the Environmental Protection Authority and outlines auditable Ministerial requirements and commitments that must be adhered to as part of the environmental approvals process. Each item has been assessed and an implementation status determined in accordance with guidance materials prepared by the OEPA (2014). Evidence of the status of each is also provided.

6.2 Environmental Management Plan Audit Table

Prior to any on-ground disturbances at Lot 107, a series of three environmental management plans (EMPs) were prepared in compliance with Ministerial Conditions 6.1, 8.1 and 9.1 of Ministerial Statement 780. These documents were prepared, approved and implemented, and explicitly stated they related Lot 107. However, as stage 2 of the development process will occur on a portion of Lot 107 and Lot 900, these documents are in the process of being updated to include reference to Lot 900.



AUDIT TABLE

Statement Compliance Section

PROJECT: Extension of Rehoboth Christian School, 92 Kenwick Road, Kenwick, City of Gosnells

Statement 780

Note:

- Phases that apply in this table = **Pre-Construction, Construction, Operation, Decommissioning, Overall (several phases)**
- This audit table is a summary and timetable of conditions and commitments applying to this project. Refer to the Minister's Statement for full detail/precise wording of individual elements.
- Code prefixes: M = Minister's condition; P = Proponent's commitment; A = Audit specification; N = Procedure.
- Abbreviations: CAR = Compliance Assessment Report; CEO = Chief Executive Officer of OEPA; DEC = Department of Environment and Conservation; DER = Department of Environment Regulation; DIA = Department of Indigenous Affairs; DMP = Department of Mining and Petroleum; DoH = Department of Health; DoW = Department of Water, DPaW = Department of Parks and Wildlife, EPA = Environmental Protection Authority, Minister for Env = Minister for the Environment; OEPA = Office of the Environmental Protection Authority.
- Compliance Status: C = Compliant, CLD = Completed, NC = Non – compliant, NR = Not Required at this stage. Please note the terms NA = Not Audited and VR = Verification Required are only for OEPA use. IP = In Process may only be used by the proponent in circumstances outlined in Section 2.8 of the *Post Assessment Guideline for Preparing an Audit Table*.

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
780:M1.1	Proposal Implementation	The proponent shall implement the proposal as assessed by the Environmental Protection Authority and described in schedule 1 of this statement subject to the conditions and procedures of this statement.	Stage 1 completed, Stage 2 in early stages of implementation	Compliance Reports (CR)	Overall	Stage 1 completed 2015, Stage 2 preliminary works commenced October 2016	C
780:M2.1	Proponent Nomination and Contact Details	The proponent for the time being nominated by the Minister for the Environment under sections 38(6) or 38(7) of the Environmental Protection Act 1986 is responsible for the implementation of the proposal.	No change	Website URL: http://www.rehoboth.wa.edu.au/ , accessed January 2018	Overall	Since April 2012	C
780:M2.2	Proponent Nomination and Contact Details	The proponent shall notify the Chief Executive Officer (CEO) of the Department of Environment and Conservation of any change of the name and address of the proponent for the serving of notices or other correspondence within 30 days of such change.	Not required	Letter to the CEO notifying of change of contact name and address.	Overall	Within 30 days of such change.	C
780:M3.1	Time Limit of Authorisation to commence	The authorisation to implement the proposal provided for in this statement shall lapse and be void within five years after the date of this statement if the proposal to which this statement relates is not substantially commenced.	Ministerial Statement 780 dated 19 Jan 2009	Stage 1 commenced 2011, completed 2015; Stage 2 (Lot 900) in design stage, with expected commencement in early 2018	Overall	Commence implementation by 19 January 2014.	C
780:M3.2	Time Limit of Authorisation to commence	The proponent shall provide the CEO of the Department of Environment and Conservation with written evidence which demonstrates that the proposal has substantially commenced on or before the expiration of five years from the date of this statement.	Completed	Letter to the CEO demonstrating that the proposal has substantially commenced.	Overall	Within one month of commencement.	CLD
780:M4.1	Compliance Reporting	The proponent shall submit to the CEO of the Department of Environment and Conservation environmental compliance reports annually reporting on the previous twelve-month period, unless required by the CEO of the Department of Environment and Conservation to report more frequently.	Compliance reporting, with 2018 compliance report prepared and submitted 19 January 2018.	CR	Overall	Annually by 19 January each year unless required more frequently.	C

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
780:M4.2	Compliance Reporting	The environmental compliance reports shall address each element of an audit program approved by the CEO of the Department of Environment and Conservation and shall be prepared and submitted in a format acceptable to the CEO of the Department of Environment and Conservation	Audit template provided by OEPA, audited annually by Natural Area and included in Annual Compliance Report	Audit program and CR.	Overall	Annually	C
780:M4.3	Compliance Reporting	Submission of Environmental Compliance Reports.	The environmental compliance reports shall: 1.be endorsed by signature of the proponents Managing Director or a person, approved in writing by the CEO of the Department of Environment and Conservation, delegated to sign on behalf of the proponents Managing Director; 2.state whether the proponent has complied with each condition and procedure contained in this statement; 3.provide verifiable evidence of compliance with each condition and procedure contained in this statement; 4.state whether the proponent has complied with each key action contained in any environmental management plan or program required by this statement; 5.provide verifiable evidence of conformance with each key action contained in any environmental management plan or program required by this statement; 6.identify all non-compliances and non-conformances and describe the corrective and preventative actions taken in relation to each non-compliance or non-conformance; 7.review the effectiveness of all corrective and preventative actions taken; and 8.describe the state of implementation of the proposal.	CR	Overall	Annually	C
780:M4.4	Compliance Reporting	The proponent shall make the environmental compliance reports required by condition 4-1 publicly available in a manner approved by the CEO of the Department of Environment and Conservation	In accordance with Proposal Implementation Monitoring Section D Fact Sheet 1 D Draft - Making Documents Publicly Available D May 2009.	Available on college website: http://rehoboth.wa.edu.au/our-story/public-reports/	Overall	Within 2 weeks of submission to OEPA.	C
780:M5.1	Performance Review and Reporting	The proponent shall submit to the CEO of the Department of Environment and Conservation Performance Review Reports at the conclusion of the first, third, fifth, seventh and ninth years after the start of implementation of the proposal and then, at such intervals as the CEO of the Department of Environment and Conservation may regard as reasonable.	The Performance Review Reports shall address: 1.the major environmental risks and impacts; the performance objectives, standards and criteria related to these; the success of risk reduction/impact mitigation measures and results of monitoring related to the management of the major risks and impacts; 2.the level of progress in the achievement of sound environmental performance, including industry benchmarking, and the use of best available technology where practicable; and 3.significant improvements gained in environmental management which could be applied to this and other similar projects.	Performance Review Reports, with fourth report submitted 19 January 2018.	Overall	At the conclusion of the first, third, fifth, seventh and ninth years after the start of implementation of the proposal and then, at such intervals as the CEO of the DEC may regard as reasonable.	C

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
780:M6.1	Wetland and Vegetation Rehabilitation Plan	Prior to commencement of ground disturbance activities, the proponent shall prepare and submit a Wetland and Vegetation Rehabilitation Plan.	The plan shall meet the objectives set out in Condition 6-3 and the requirements of Condition 6-4 as determined by the CEO of the Department of Environment and Conservation.	Wetland and Vegetation Rehabilitation Plan for Lot 107 completed, letter from OEPA dated 25 October 2016.	Design	Prior to commencement of ground disturbance activities.	CLD
780:M6.2	Wetland and Vegetation Rehabilitation Plan	In preparing the Plan the proponent shall consult with the DEC and Department of Water (DoW).		Wetland and Vegetation Rehabilitation Plan for Lot 107 completed, letter from OEPA dated 25 October 2016.	Design	Prior to commencement of ground disturbance activities.	CLD
780:M6.3	Wetland and Vegetation Rehabilitation Plan	Prepare and submit a Wetland and Vegetation Rehabilitation Plan	The objectives of the Plan are to: 1.ensure full rehabilitation of not less than 0.18 hectares of Threatened Ecological Community claypan wetlands (refer to area delineated on Figure 2); 2.ensure partial rehabilitation of not less than 0.66 hectares of Threatened Ecological Community claypan wetlands (refer to area delineated on Figure 2) and; 3.ensure protection of endemic fauna.	Wetland and Vegetation Rehabilitation Plan for Lot 107 completed, letter from OEPA dated 25 October 2016.	Design	Prior to commencement of ground disturbance activities.	CLD
780:M6.4	Wetland and Vegetation Rehabilitation	Prepare and submit a Wetland and Vegetation Rehabilitation Plan	The Plan shall include management measures for: 1.identification and protection of endemic fauna; 2.removal of weeds; 3.installation of fencing prior to site works; 4.revegetation or rehabilitation with appropriate local species; and 5.implementation of the rehabilitation works by people with demonstrated expertise in rehabilitating wetlands	Wetland and Vegetation Rehabilitation Plan for Lot 107 completed, letter from OEPA dated 25 October 2016.	Design	Prior to commencement of ground disturbance activities.	CLD
780:M6.5	Wetland and Vegetation Rehabilitation Plan	The proponent shall implement the Wetland Management Plan required by condition 6-1.	Annual Compliance Reports to 2016	Wetland and Vegetation Rehabilitation Plan for Lot 107 completed, letter from OEPA dated 25 October 2016.	Overall	Post construction	CLD
780:M7.1	Conservation Covenant	Prior to commencement of ground disturbance activities, the proponent shall enter into a Conservation Covenant with a suitable covenant agency for the Conservation Area delineated in Figure 3 (attached) that will adequately protect the wetland and vegetation values, to the satisfaction of the CEO of the Department of Environment and Conservation.	The covenant shall: 1. ensure conservation of the Declared Rare Flora and Threatened Ecological Communities on site; 2. conserve the Conservation Category Wetland values and valuable linkages to other remnant vegetation and the Greater Brixton Street Wetlands; and 3. prohibit future development of the remaining undeveloped portion of Lot 107.	Conservation Covenant with a suitable covenant agency. Completed, OEPA letter dated 25 October 2016.	Design	Prior to commencement of ground disturbance activities.	CLD
780:M8.1	Wetland and Vegetation Management Plan	Prior to commencement of ground disturbance activities, the proponent shall prepare and submit a Wetland and Vegetation Management Plan.	The plan shall meet the objectives set out in Condition 8-3 and the requirements of Condition 8-4 as determined by the CEO of the Department of Environment and Conservation.	Wetland and Vegetation Management Plan, for Lot 107 in the process of being updated to reflect inclusion of Lot 900; to be approved prior to ground disturbing activities.	Design	Prior to commencement of ground disturbance activities.	C
780:M8.2	Wetland and Vegetation Management Plan	In preparing the Plan the proponent shall consult with the DEC and DoW.		Wetland and Vegetation Management Plan, for Lot 107 approved in 2010. Will be updated to include reference to Lot 900.	Design	Prior to commencement of ground disturbance activities.	C
780:M8.3	Wetland and Vegetation Management Plan	Prepare and submit a Wetland and Vegetation Management Plan.	The objectives of the Plan are to ensure: 1. ongoing management of the Conservation Area, which includes the Declared Rare Flora, Threatened Ecological Communities and the Conservation Category Wetland (See Figure 3) and;	Wetland and Vegetation Management Plan, for Lot 107 approved in 2010. Will be updated to include reference to Lot 900.	Design	Prior to commencement of ground disturbance activities.	C

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
			2. ongoing management of the developed site (post-construction).				
780:M8.4	Wetland and Vegetation Management Plan	Prepare and submit a Wetland and Vegetation Management Plan.	The Plan shall include management measures for: 1. identification and protection of endemic fauna; 2. provision and maintenance of ecological linkages; 3. provision of a densely vegetated strip of no less than 10 metres between the development boundary and the wetland; 4. maintenance of fencing; 5. ongoing weeding; 6. ongoing planting of appropriate local species; 7. maintenance of rehabilitation plantings to ensure successful establishment; 8. ongoing monitoring of wetland and vegetation condition; 9. maintenance of paths and access areas; 10. identification and protection of Aboriginal sites; and 11. fire protection	Wetland and Vegetation Management Plan, for Lot 107 approved in 2010. Will be updated to include reference to Lot 900.	Design	Prior to commencement of ground disturbance activities.	C
780:M8.5	Wetland and Vegetation Management Plan	The proponent shall implement the Wetland Management Plan required by condition 8-1.		Wetland and Vegetation Management Plan, for Lot 107 approved in 2010. Will be updated to include reference to Lot 900.	Overall	Implementation will continue for Phase 2	C
780:M9.1	Drainage and Nutrient Management Plan	Prior to commencement of ground disturbance activities, the proponent shall prepare and submit a Drainage and Nutrient Management Plan.	The plan shall meet the objectives set out in Condition 9-3 and the requirements of Condition 9-4 as determined by the CEO of the Department of Environment and Conservation.	Drainage and Nutrient Management Plan for Lot 107 approved in 2010. Will be updated to include reference to Lot 900	Design	Implementation will continue for Phase 2	C
780:M9.2	Drainage and Nutrient Management Plan	In preparing the Plan the proponent shall consult with the DEC and DoW.		Drainage and Nutrient Management Plan for Lot 107 approved in 2010. Will be updated to include reference to Lot 900	Design	Implementation will continue for Phase 2	C
780:M9.3	Drainage and Nutrient Management Plan	Prepare and submit a Drainage and Nutrient Management Plan.	The objectives of the Plan are to: 1. Protect the environmental values of the wetland, adjacent wetlands and waterways; 2. Ensure that the hydrological regime of the conserved wetland is maintained; 3. Prevent or minimise impacts of nutrients, sediments and other pollutants from stormwater on the water quality of the wetland; and 4. Avoid acid sulphate soil drainage impacts on the wetland.	Drainage and Nutrient Management Plan for Lot 107 approved in 2010. Will be updated to include reference to Lot 900	Design	Implementation will continue for Phase 2	C
780:M9.4	Drainage and Nutrient Management Plan	Prepare and submit a Drainage and Nutrient Management Plan.	The Plan shall include management measures for: 1. Acid sulphate soils, including an investigation that details the potential for acid sulphate soils relating to the installation of the perimeter drain and that the subsequent recommendations in the event that ASS be present;	Drainage and Nutrient Management Plan for Lot 107 approved in 2010. Will be updated to include reference to Lot 900	Design	Implementation will continue for Phase 2	C

Audit Code	Subject	Requirement	How	Evidence	Phase	Timeframe	Status
			2. Drainage of the site and its potential impacts on the wetland; 3. Stormwater management, including installation of detention basins to minimise impacts of nutrients, sediments and other pollutants on the water quality of the wetland; and 4. Nutrient and irrigation management				
780:M9.5	Drainage and Nutrient Management Plan	The proponent shall implement the Drainage and Nutrient Management Plan required by condition 9-1.		Drainage and Nutrient Management Plan for Lot 107 approved in 2010. Will be updated to include reference to Lot 900	Overall	Implementation will continue for Phase 2	C

Management Plan Audit Table

Commitments Related to the Development Area

Phase: Prior to construction

No.	Management commitment	How	Evidence	Status	Date
PC1	Prior to site works commencing, the construction area and a 10m buffer will be fenced with temporary 2m high construction fencing prior to site works (in addition to the existing wetland fencing)	During pre-construction works	Stage 2 works yet to be implemented	NR	19 Jan 2018
PC2	Prior to site works, sediment fencing will be erected along the northern boundary and the top half of the eastern boundary of the development area to prevent soil and sediment entering the wetland	During pre-construction works	Stage 2 works yet to be implemented	NR	19 Jan 2018
PC2	Prior to construction, import clean fill to provide 0.5m clearance above AAMGL for development	During pre-construction works	Stage 2 works yet to be implemented	NR	19 Jan 2018

Phase: During construction

No.	Management commitment	How	Evidence	Status	Date
DC1	During construction, install below ground drainage tanks and associated pipework with sufficient capacity to retain up to the 5 year ARI (as required by the City of Gosnells). Flows in excess of the 5 year ARI are permitted to discharge to the City of Gosnells piped stormwater network located along Brixton Street.	During construction works	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC2	Any wash water resulting from construction activities (i.e. concreting, plastering, painting, gluing) shall be contained within a designated washdown area which will be lined with impervious material and covered to prevent stormwater entering the wash down area. The wash water will be regularly emptied and removed off site by a licensed contractor	Monitored by Site Supervisor and Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC3	Waste will be stored in closed skip bins or wheelie bins to minimise wind-blown waste entering the wetland	Site planning and management	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC4	Site personnel will be made aware of the location of waste bins and any special storage and disposal arrangements (e.g. wash down area)	Induction process and audits by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC5	Where relevant, waste will be removed by a licensed contractor and will be disposed at an approved waste management facility	Waste skips removed weekly, or more frequently as required;	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC6	No hazardous substances or dangerous goods will be stored on site	Site planning and management; little or no requirement for dangerous goods during construction	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC7	Any material contaminated by spills i.e. fuel, oil, lubricants etc. will be stored in a sealed secure container and transported to an approved waste disposal site	Monitored by Site Supervisor and Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC8	Waste storage areas will be located at the southern end of the development area, away from the wetland and the stormwater system	Site planning and management	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC9	Temporary on-site toilets will be removed and replaced regularly	Ongoing construction management	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC10	No vehicles are to be serviced or cleaned onsite to prevent the discharge of pollutants to stormwater	Serviced by offsite providers at appropriate locations, monitored by Site Supervisor and Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC11	Encourage construction vehicles to access the site via Kenwick Road and the southern end of Brixton Street, to minimise disturbance to fauna	To be confirmed prior to building commencing	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC12	Construction machinery shall remain on the fill area	Site planning and management	Stage 2 works yet to be implemented	NR	19 Jan 2018

No.	Management commitment	How	Evidence	Status	Date
DC13	Flammable waste, including cigarette butts, shall be properly extinguished prior to disposal in waste bins	No smoking allowed on site; checked by Site Supervisor and Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC14	Maintain construction fencing throughout construction phase to prevent unlawful access and activities in construction area (i.e. lighting waste bins)	Site planning and management	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC15	Place temporary demountable buildings for on-site personnel along the Brixton Street edge of the development area to screen construction activities from nearby residents	Site planning and management	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC16	Sediment fences will be regularly inspected, particularly during and after heavy rainfall to ensure they are fully functional	Site planning and management	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC17	Undertake a water monitoring program for the site, including groundwater levels and quality and surface water quantity and quality and surface water levels in wetland. This will require the establishment of a staff gauge in the wetland area to measure surface water levels.	Implementation of surface and groundwater monitoring program, as outlined in the Drainage and Nutrient Management Plan and Wetland and Vegetation Management Plan originally prepared by BlueSands Environmental in 2010 and updated by Natural Area 2018	Groundwater quality monitoring recommenced late 2016 and continued in 2017; certificates of analysis provided in Appendix 3. Staff gauge installed 18 September 2013	Compliant	19 Jan 2018
DC18	The boundary of the fill will be regularly inspected by the site manager and periodically by an environmental consultant, particularly during and after heavy rainfall to ensure erosion does not occur	Inspections regularly carried out by Site Supervisor and periodically by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC19	Regularly inspect the washdown area and ensure it is regularly emptied Environmental consultant to undertake random site inspections to ensure the management commitments are being adhered to and include findings in the performance report	Inspections regularly carried out by Site Supervisor and periodically by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC20	Site manager to regularly inspect the washdown area and ensure it is regularly emptied	Inspections regularly carried out by Site Supervisor and periodically by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC21	Site manager to ensure that the site is regularly cleared of any litter (at least once per week or more often if conditions require)	Inspections regularly carried out by Site Supervisor and periodically by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC22	Site manager to regularly inspect waste storage areas (>3 times/week during construction period) to ensure proper disposal of waste products	Inspections regularly carried out by Site Supervisor and periodically by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC23	Site manager to regularly inspect waste storage areas (>3 times/week during construction period) to ensure bins are regularly emptied and no overflow occurs	Inspections regularly carried out by Site Supervisor and periodically by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018
DC24	Environmental consultant to undertake random site inspections to ensure the management commitments are being adhered to and include findings in the performance report	Random inspections carried out by Natural Area	Stage 2 works yet to be implemented	NR	19 Jan 2018

No.	Management commitment	How	Evidence	Status	Date
DC25	Establish a log of any complaints related to construction activities received by Rehoboth Christian School during the construction phase	Electronic complaints register set up in main office, includes details of date, complainant, contact information, details of the complaint, and response	Stage 2 works yet to be implemented	NR	19 Jan 2018

Phase: Post construction

No.	Management commitment	How	Evidence	Status	Date
PoC1	Provide a densely vegetated strip of local native species along the north western boundary of the development	Mulching and on-ground planting activities	Site visits by Natural Area Consulting at various times, plants growing well without being too dense and posing a fire hazard	Complete	12/12/11
PoC2	Plants and mulch used in landscaping shall be sourced from a NIASA accredited nursery. When ordering plants and mulch the manager/staff from the supplying nursery should be made aware that the plants and mulch must be disease free	Materials sourced from Benara Nursery, which is NIASA accredited	Communication with BlueSands Environmental, Benara website: http://www.benaranurseries.com/showpage.asp?ButtonID=1 , accessed 03 May 2012	Complete	03/05/12
PoC3	Only slow release fertilisers will be applied to the oval and any new grassed areas.	2017 results provided	Communication with Rehoboth Christian College Reports from Nuturf provided.	Compliant	19 Jan 2018
PoC4	Application will only occur at peak growth times of the year, namely spring or early summer.				
PoC5	Fertiliser application will be subject to soil analysis, to avoid excessive fertiliser application and subsequent leaching into groundwater or runoff into the wetland.				
PoC6	Local native shrubs will be used in landscaping and the densely vegetated strip that shall be planted along the northern boundary of the buildings.	Mulching and on-ground planting activities	Site visit Natural Area Consulting at various times, plants growing well.	Complete	12/12/11
PoC7	Annually monitor the survival rate of plants within the vegetated strip for three years post-development	As per monitoring timetable for the conservation area, as determined by the on-ground works contractor, Natural Area	Site visit by Natural Area Consulting in September 2014 indicated plants were thriving with no deaths. Monitoring has now occurred for three years post development.	Complete	19/01/15

Commitments Related to the Conservation Area

Phase: During construction

No.	Monitoring commitment	How	Evidence	Status	Date
DC26	Undertake a water monitoring program for the site, including groundwater levels and quality and surface water quantity and quality and surface water levels in wetland This will require the establishment of a staff gauge in the wetland area to measure surface water levels.	Implementation of surface and groundwater monitoring program, as outlined in the Drainage and Nutrient Management Plan and Wetland and Vegetation Management Plan originally prepared by BlueSands Environmental in 2010 and updated by Natural Area 2018	Groundwater quality monitoring recommenced late 2016 and continued in 2017; certificates of analysis provided in Appendix 3. Staff gauge installed 18 September 2013	Compliant	19 Jan 2018

Phase: Post construction

No.	Management commitment	How	Evidence	Status	Date
PoC8	Rehabilitate degraded areas of the conservation area, as per the Wetland and Vegetation Rehabilitation Plan (including weed removal, revegetation and maintenance)	On-ground works complete 2013	Natural Area Consulting Management Services Annual Report – January 2015	Complete	19/01/15
PoC9	Control weeds within the conservation area, paying particular attention to the boundary to ensure no new weed species are introduced to the area	On-ground works complete 2013	Natural Area Consulting Management Services Annual Report – January 2015	Complete	19/01/15
PoC10	Prevent uncontrolled access of students and other pedestrians entering conservation area by maintaining fencing and keeping access points closed	Retain or install fencing between the main school grounds and the conservation category wetland	Ongoing visits by Natural Area	Complete	19/01/15
PoC11	Prevent students accessing the area during the months of June to September to prevent any disruption to the breeding season of the Quenda (<i>Isodon obesulus fusciventer</i>)	Retain or install fencing between the main school grounds and the conservation category wetland; No student field and/or project activities to be undertaken during this period	Register of student site visits indicates that visits are not permitted during June – September	Compliant	19/01/18
PoC12	Remove any waste dumped in the conservation area as soon as practical, in order to discourage further dumping and to prevent any impacts to flora and fauna	Inspections for the presence of rubbish occur at least each term, any reported rubbish is removed as required	Various site visits by Natural Area	Compliant	19/01/18
PoC13	Manage exotic (introduced) fauna and flora on school grounds and in the conservation area by discouraging pets to be brought into the school grounds and by informing adjacent residents of the need to keep pets out of the conservation area (either by letter drop or a notice in the local paper)	No pets are allowed at the school at any time	Communication with Rehoboth Christian College personnel; school grounds are fenced preventing uncontrolled access to the wetland area, fence continues to be in good repair	Compliant	19/01/18
PoC14	Ensure that exterior building lighting is minimised, particularly on the eastern and northern edges of the new classroom block, to minimise any light disruptions to fauna	Specification during building process, the number of lights in the vicinity of the wetland has been kept to a minimum, as has the illumination level of the lights	Communication with Mapel Builders and Rehoboth Christian College personnel	Complete	19/01/13
PoC15	Annually maintain existing fire breaks and access points	As per City of Gosnells requirements	Bushfire management plan updated 2017	Compliant	19/01/18
PoC16	Liaise with Gosnells Volunteer Fire Brigade to ensure they are familiar with access points to the management area	RCC has developed comprehensive bushfire response procedures, a copy of which has been provided to relevant external organisations, including the fire brigade	Bushfire management plan updated 2017	Compliant	19/01/18
PoC17	Report any suspicious behaviour of people in the conservation area to the relevant authorities	None has occurred at present; policy developed, register set up in main office	Communication with Rehoboth Christian College personnel, details included in RCC Critical Incident Policy	Compliant	19/01/18

No.	Management commitment	How	Evidence	Status	Date
PoC18	Maintain existing fencing to prevent unregulated access to the conservation area	New fencing installed between school and wetland (approx. Jan 2012), existing fencing around wetland will be maintained; fencing will be checked a minimum of once each term, and on an ad hoc basis during class site visits	Various site visits by Natural Area	Compliant	19/01/18
PoC19	Establish a register for class visits to the wetland area. The register will be included in the annual compliance report, detailing the date of the visit, supervising teacher, number of students and location of visit (i.e. firebreaks, listening posts or transect monitoring)	Register set up and available for inspection at Senior College administration area	Continued communication with Rehoboth Christian School personnel	Compliant	19/01/15
PoC20	Undertake a water monitoring program for the site, including groundwater levels and quality and surface water quantity and quality and surface water levels in wetland. This will require the establishment of a staff gauge in the wetland area to measure surface water levels.	Implementation of surface and groundwater monitoring program, as outlined in the Drainage and Nutrient Management Plan and Wetland and Vegetation Management Plan originally prepared by BlueSands Environmental in 2010 and updated by Natural Area 2018	Groundwater quality monitoring recommenced late 2016 and continued in 2017; certificates of analysis provided in Appendix 3. Staff gauge installed 18 September 2013	Compliant	19 Jan 2018
PoC21	Establish three transects in the rehabilitation areas to determine the success of rehabilitation activities (for sampling details, see the Wetland and Vegetation Rehabilitation Plan)	Documented by on-ground works contractor (Natural Area Management and Services)	Natural Area 2015 Annual Report	Complete	19/01/15
PoC22	Monitor populations of Declared Rare Flora <i>Lepidosperma rostratum</i> (for sampling details, see the Wetland and Vegetation Rehabilitation Plan)	Documented by on-ground works contractor	Natural Area 2015 Annual Report	Complete	19/01/15
PoC23	Conduct a flora survey every five years to measure the cover and composition of native taxa, vegetation condition, priority flora, presence of disease and cover and composition of weeds in the conservation area (for sampling details, see the Wetland and Vegetation Rehabilitation Plan)	To be carried out by appropriately experienced personnel, outcomes compared to the baseline and other monitoring data, and documented	Natural Area 2015 Annual Report	Complete	19/01/15
PoC24	Monitor indicator bird species that are susceptible to cat predation	Will be documented by on-ground works contractor in annual report, to be carried out in conjunction with senior school students	Natural Area 2016 Performance Review Report	Complete	19/01/15
PoC25	Monitor endemic fauna, including Quenda and frogs as per the monitoring schedule outlined in the <i>Wetland and Vegetation Rehabilitation Plan</i>	Will be documented by on-ground works contractor in annual report, to be carried out in conjunction with senior school students	Natural Area 2016 Performance Review Report	Complete	19/01/15

No.	Management commitment	How	Evidence	Status	Date
PoC26	Publicise the results of the fauna monitoring program undertaken by students in the school newsletter and submit the article to the local newspaper	Results included in NAMS 2013 Annual Works Report	Natural Area 2016 Performance Review Report	Complete	19/01/15
PoC27	Monitor the occurrence of fire within the conservation area	None to date, fire assessment at the school has been prepared	Aerial imagery available from NearMap and/or Landgate, communication with Rehoboth personnel	Compliant	19/01/18
PoC28	Periodically inspect perimeter fencing every 2 to 3 months to ensure it is in good condition	Regular inspections of perimeter fencing for general condition will occur once per term as a minimum	New fence installed approx. Jan 2012, continues to be in good repair	Compliant	19/01/18

7.0 Glossary

ANZECC	Australian and New Zealand Environment and Conservation Council
ARI	Assessment on Referral Information; assessment level under Part IV of the <i>Environmental Protection Act 1986</i> (WA) set by the Environmental Protection Authority (EPA) whereby the assessment is carried out on the basis of information submitted by the proponent
ARMCANZ	Agriculture and Resource Management Council of Australia and New Zealand
CCW	Conservation category wetland as defined by the wetlands branch of the Department of Parks and Wildlife (DPaW) and listed on the Geomorphic Wetlands Swan Coastal Plain Dataset
DEC	Department of Environment and Conservation; now DER and DPaW
DER	Department of Environment Regulation
DPaW	Department of Parks and Wildlife
DWER	Department of Water and Environmental Regulation
EMP	Environmental management plan, prepared as an environmental approval condition
EPA	Environmental Protection Authority (Western Australia)
OEPA	Office of the Environmental Protection Authority
TEC	Threatened ecological community declared or listed under the <i>Wildlife Conservation Act 1950</i> (WA) (and/or the <i>Environmental Protection and Biodiversity Conservation Act 1999</i> (Cwlth))

8.0 References

Australian and New Zealand Environment Conservation Council (ANZECC) and Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ), (2000), *Australian and New Zealand Guidelines for Fresh and Marine Water Quality*, available World Wide Web URL:

<http://www.environment.gov.au/system/files/resources/53cda9ea-7ec2-49d4-af29-d1dde09e96ef/files/nwqms-guidelines-4-vol1.pdf>, accessed January 2017.

Environmental Protection Authority, (2007), *Bulletin 1249, Report and Recommendations: Extension of Rehoboth Christian School, 92 Kenwick Road, Kenwick*, available World Wide Web URL:

<http://www.epa.wa.gov.au/EIA/EPAREports/Pages/default.aspx?cat=EPAReports&url=EIA/EPAREports&a=Y&ind=4>, accessed January 2012.

Fairlamb, R., (2018), Accountant, Rehoboth Christian College, Personal Communication.

Office of Environmental Protection Authority, (2009), *Statement that a Proposal May be Implemented (Pursuant to the Provisions of the Environmental Protection Act 1986) – Extension of Rehoboth Christian School 92 Kenwick Road, Kenwick, City of Gosnells*, available World Wide Web URL:

<http://www.epa.wa.gov.au/peia/approvalstatements/Pages/default.aspx?a=Y&ind=3>, accessed January 2012.

Office of the Environmental Protection Authority, (2014), *Post Assessment Guideline for Preparing a Compliance Assessment Report*, available World Wide Web URL:

<http://www.epa.wa.gov.au/sites/default/files/Publications/PAG3%20-%20Preparing%20a%20CAR.pdf>, accessed January 2017.

Steyn, M., (2018), Chief Executive Officer, Association for Christian Education Inc. (Rehoboth Christian College), Personal Communication.

Wildlife Conservation Act 1950 (WA)

Appendix 1: Statement of Compliance

1. Proposal and Proponent Details

Proposal Title		Extension of Rehoboth Christian School 92 Kenwick Road, Kenwick, City of Gosnells
Statement Number		780
Proponent Name		Association for Christian Education Inc.
Proponent's Australian Company Number (where relevant)		N/A

2. Statement of Compliance Details

Reporting Period	20/01/17 to 19/01/18
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Implementation phase(s) during reporting period (please tick ✓ relevant phase(s))							
Pre-construction	✓	Construction		Operation	✓	Decommissioning	

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

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

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

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

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

Non-compliance/potential non-compliance 0-1

Which implementation condition or procedure was non-compliant or potentially non-compliant?	
Was the implementation condition or procedure non-compliant or potentially non-compliant?	
On what date(s) did the non-compliance or potential non-compliance occur (if applicable)?	
Was this non-compliance or potential non-compliance reported to the Chief Executive Officer, DWER?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> Reported to DWER verbally Date _____ <input type="checkbox"/> Reported to DWER in writing Date _____	<input type="checkbox"/> No
What are the details of the non-compliance or potential non-compliance and where relevant, the extent of and impacts associated with the non-compliance or potential non-compliance?	
What is the precise location where the non-compliance or potential non-compliance occurred (if applicable)? (please provide this information as a map or GIS co-ordinates)	
What was the cause(s) of the non-compliance or potential non-compliance?	
What remedial and/or corrective action(s), if any, were taken or are proposed to be taken in response to the non-compliance or potential non-compliance?	
What measures, if any, were in place to prevent the non-compliance or potential non-compliance before it occurred? What, if any, amendments have been made to those measures to prevent re-occurrence?	
Please provide information/documentation collected and recorded in relation to this implementation condition or procedure: <ul style="list-style-type: none"> • in the reporting period addressed in this Statement of Compliance; and • as outlined in the approved Compliance Assessment Plan for the Statement addressed in this Statement of Compliance. (the above information may be provided as an attachment to this Statement of Compliance)	

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

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

4. Proponent Declaration

I, MARK CHRISTOPHER STEIN, CEO, (full name and position title)

declare that I am authorised on behalf of the Association for Christian Education.....
(being the person responsible for the proposal) to submit this form and that the information contained in this form is true and not misleading.

Signature:  Date: 18.01.2018

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

5. Submission of Statement of Compliance

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

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

6. Contact Information

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

Manager, Compliance (Ministerial Statements)
Department of Water and Environmental Regulation

Postal Address: Locked Bag 10
EAST PERTH WA 6892

Phone: (08) 6364 700

Email: compliance@dwer.wa.gov.au

7. Post Assessment Guidelines and Forms

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

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

ATTACHMENT 1

Table 1 Compliance Status Terms

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

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

Appendix 2: Nuturf Nutrient Analysis Reports



Curator of Grounds – Vic Eikelboom
Rehoboth Christian College
PO Box 82
CANNINGTON WA 6987

30 June 2017

Vic,

Thank you for allowing Nuturf to perform your soil tests at Rehoboth Christian College. Our reports are in an easy to read format and give you the most accurate results in Australia for turf grass management. Please note that recommendations are based on rate per 100m² or ha and I have compared these samples with all previous tests. If you have any questions relating to products recommended in this report, please contact me directly.

SOIL TEST RESULTS

CALCIUM:

The current level in the “Gym Lawn” is fine and no correction is required. The pH in this area is high at 8, but down from 8.7 on the previous test. Results are consistent with previous tests and trace elements are required. Again I strongly suggest that you have your irrigation water tested this summer so we can see the results and evaluate it when the aquifer is at its lowest.

The “Main Oval” is slightly low in calcium in terms of ppm (parts per million) and base saturation. There has been an increase in the calcium ppm result from the last test and this is a sound and should continue as the sodium level has also continued to drop – as calcium increases sodium decreases and this has always been the result we have wanted. The desired calcium levels we need to aim for are 1000-1200 ppm and maintain that level where possible. Soil pH has dropped from 6.9 to 6.6 and this is a better result so I would not be concerned with this at all. The Main Oval requires a liquid wetting agent this spring, followed by the granular applications. The Main Oval has received calcium in the form of gypsum and increases can clearly be seen when you look at the comparisons on this site and I suggest aerating the oval this spring and apply gypsum after this and water in well.

On the “Main Oval” site I would apply High Cut Gypsum at 5kg/100m² or 500kg/ha and water in well. Make at least three applications per year and they would be best applied after any aeration in spring and during your irrigation season. This will increase calcium levels and displace sodium without adjusting pH levels.

Calcium cont:

I would suggest a water test during the summer months each year to check if this is influencing the level of calcium in the soil. I realise there is little you or the school can do about your source of water, but frequent analysis helps to monitor your situation and diagnose problems before they become too serious. This information will also help you to choose products that have a lower salt index and apply products that may have a better result on the turf given your soil type and conditions and therefore limiting the amount of unwanted product going into the environment (this is extremely important on your location). It is important to understand the concept, see below, that your turf receives more irrigation water than any other product or element, therefore knowing the make-up of your irrigation water is an important tool in setting up your maintenance program.

The quality of water used for irrigation can dramatically affect turf grass health and performance, as well as characteristics of the soil. If a soil is irrigated with a given water quality over an extended period of time, the soil will assume the characteristics of that irrigation source. If the water quality is poor, soil structure, nutrient availability (therefore fertiliser efficiency) and ultimately turf quality will be affected.

MAGNESIUM:

The levels in both sites are low and have remained steady since the last tests were done and fertilisers with a small percentage of magnesium in them are recommended such as PROLIFIC BLUE AN.

If ever the ovals are sprayed with a foliar mix of fertiliser it would be best to include some magnesium in the mix at say 25kg/ha – your current contractor can perform spraying and aeration etc.

Apply Magnesium Sulphate at 25-50kg/ha and water in well. Consider the use of Keiserite at 2kg/100m² or 200kg/ha and water in. Renovation of the oval is the best time to apply this product.

POTASSIUM:

The current levels in both sites are low and fertiliser applications with sound levels of potassium are recommended and results should increase, but adequate levels need to be maintained. As summer approaches and/or next school holidays, apply POLY PLUS BALANCE 22-0-18 at a rate of 2.4kg/100m² or 240kg/ha. This product contains 45% controlled release nitrogen. I strongly recommend the use of this product.

A fertiliser containing good levels of both N and K is recommended during the summer season and I would suggest the use POLY PLUS 2% IRON 24-2-9 at a rate of 2.1kg/100m² or 210kg/ha during the summer season. This product contains 65% controlled release nitrogen.

A controlled release product designed to be applied after renovation is POLY PLUS HIGH PERFORMANCE 34-1-6 and is best applied at 1.75kg/100m² or 175kg/ha and water in. This product contains 30% controlled release nitrogen.

Potassium cont:

Non controlled release options, if allowable, are Patons 20-0-16+ 3%fe as required at 2.5kg/100m² or 250kg/ha and water in or Prolific Blue at 3kg/100m² or 300kg/ha and water in. Only apply Prolific Blue during school holidays and as with all fertilisers make sure it is not allowed to sit on paths etc to avoid any staining. Environmentally, the controlled release options are preferred given your location.

PHOSPHORUS:

The current levels in both sites are low and this could be affecting plant growth as the current root systems appeared to be under stress in terms of depth and colour/vigour. Once again some of the core samples were dry, so clearly hydrophobic soils are an ongoing issue in the main oval, so regular applications of Stamina wetting agent are required. The P level has increased slightly on the Main Oval since the last test so I was wondering if an application was made to the oval? I still recommend an application of a phosphorus based fertilizer in the spring or as renovations are done and water in well. The below product contains controlled release nitrogen, better suited to your site.

Apply POLY PLUS TURF STARTER 18-10-9 at 200kg/ha and water in well at renovation.

Also apply 175kg/ha of POLY PLUS HIGH PERFORMANCE 34-1-6 two weeks after the Turf Starter has been applied and water in well.

ORGANIC HUMUS:

The samples taken indicate slightly low levels of organic humus, therefore an application of KIKSTART ORGANIC at renovation may be beneficial. This is a low analysis NPK fertiliser but will help to build your organic humus levels. Apply at a rate of 4kg/100m² or 400kg/ha.

Applications of FOLIMAX HUMIC at 10lt/ha with every third application of Kelmax would be advisable. This is a liquid humus product and will help to build your current level of humus in the soil and help to unlock unavailable phosphorus in the soil. An optimum organic humus level for your situation is around 3% for best results.

COMMENTS:

The use of a good quality wetting agent will also improve the infiltration of irrigation water and also prevent the turf drying out prematurely throughout the summer season. A granular type wetting agent applied to the ovals may also be of benefit to the grass, particularly after it has been aerated and/or scarified.

Use STAMINA GRANULAR at 3.5kg/100m² or 350kg/ha and water in well. As a liquid wetting agent during the spring and summer, use STAMINA 90 at 50lt/ha and water in well.

GYP WET is another option when granulars are applied as it contains wetting agent but also has good levels of calcium in it so you get two required products in the one application. Apply at 500kg/ha but please give me notice if this product is required this spring as it sells well on east coast and supply can be an issue.

Comments cont:

In general the root system appeared to be stressed and contained no new, white shoots. This has been fairly consistent over all the tests but some improvement can be seen where the turf is not dry. Colouration of the roots is considered a key health indicator of the root system, where lighter colours indicate healthy and actively growing roots, while thin/brown to black roots are very restricted in terms of water and nutrient uptake.

Please note that any product applied to stimulate a healthier root system, should not be used to replace a sound fertiliser program, but used in conjunction with one. Compaction/aeration relief such as verti draining and/or coring and slicing, should also be considered as this is a major cause of a depleted root system.

The characteristics and condition of the root system are critical in determining the quantity of moisture and nutrient uptake in the plant, therefore the functionality of the root system is directly related to the performance of the turf.

Use KELMAX at 3-5lt/ha every 4 weeks, remembering to include some Folimax Humic every third application. This can be applied with many other products therefore eliminating the need for multiple spray applications. The benefits of such a product are many, but Kelmax will reduce the stress turf grass is under during summer through a larger and more vigorous root system.

Trace Elements:

As a trace element mix for the turf areas, I would suggest FOLIMAX TRACE. This is a liquid trace element, therefore eliminating the need to dissolve powder formulations. Apply at 200-300ml/100m² or 20-30lt/ha either left on the leaf to dry or water in.

Apply Iron Sulphate at 500gm/100m² or 50kg/ha tank mixed with Manganese Sulphate at 250gm/100m² or 25kg/ha. I would leave the Manganese out of the mix every third spray. Apply in plenty of water and leave on the leaf to dry. Please note that this mix will green up turf areas very quickly without a huge surge in growth, that way you get the colour you want without the extra mowing, but you must be careful with pathways and walls etc or paving that is light in colour, as this mix will stain – please call to discuss if required.

The use of trace elements is very important at your site and should not be over-looked. You should monitor trace element levels in the leaf via tissue testing at least once per year.

Use FOLIMAX NFE throughout the cooler months, or whenever a quick green-up is required at 200-300ml/100m² or 20-30lt/ha. This can be tank mixed with the Folimax Trace.

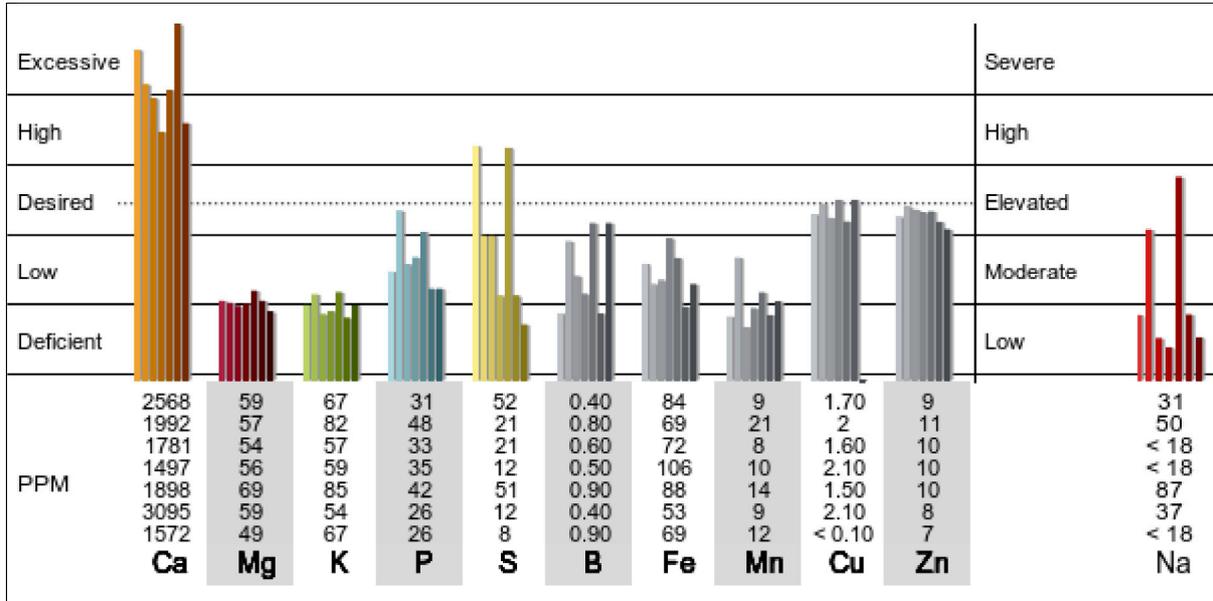
Soil Comparison

Conducted by The Ninemire Group LLC

Client: Rehoboth Christian College
Field Representative: Josh Walker
Date of Analysis: May 28, 2012



COMPARISON CHART



KEY ELEMENTS

	IDEAL	GYM LAWN OVAL 2012-05-28	GYM LAWN OVAL 2014-01-22	GYM LAWN OVAL 2014-09-22	GYM LAWN OVAL 2015-09-22	GYM LAWN OVAL 2016-03-08	GYM LAWN OVAL 2016-11-20	GYM LAWN OVAL 2017-06-28
Organic Matter (humus)		0.90	1.50	2.00	1.50	1.90	1.30	1.20
pH		8.40	8.20	8.20	8.20	7.90	8.70	8.00
Total Exchange Capacity		14.30	11.40	10.00	8.50	11.20	17.00	8.90
Ca	68-72%	89.99%	87.63%	89.02%	87.84%	85.08%	90.95%	88.49%
Mg	13-16%	3.47%	4.20%	4.50%	5.51%	5.18%	2.90%	4.56%
K	3-5%	1.21%	1.86%	1.47%	1.77%	1.96%	0.81%	1.94%
Na	<3%	0.93%	1.91%	0.61%	0.48%	3.37%	0.94%	0.62%
H	4.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Other	5%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%	4.40%

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 PO Box 6390 Silverwater NSW 1811

28 May 2012

For all your turf requirements, Nuturf can supply your fertiliser and soil amendments, a comprehensive plant protection range, wetting agents, seed and other analytical services, including root health assessments and leaf analysis.

I hope this meets your requirements and if I can be of any further assistance, please do not hesitate to contact me on 0418 955 388 or email at josh.walker@nuturf.com.au.

I look forward to your reply.

Yours sincerely,

Josh Walker
WA State Manager

0418 955 388

Check our website: www.nuturf.com.au



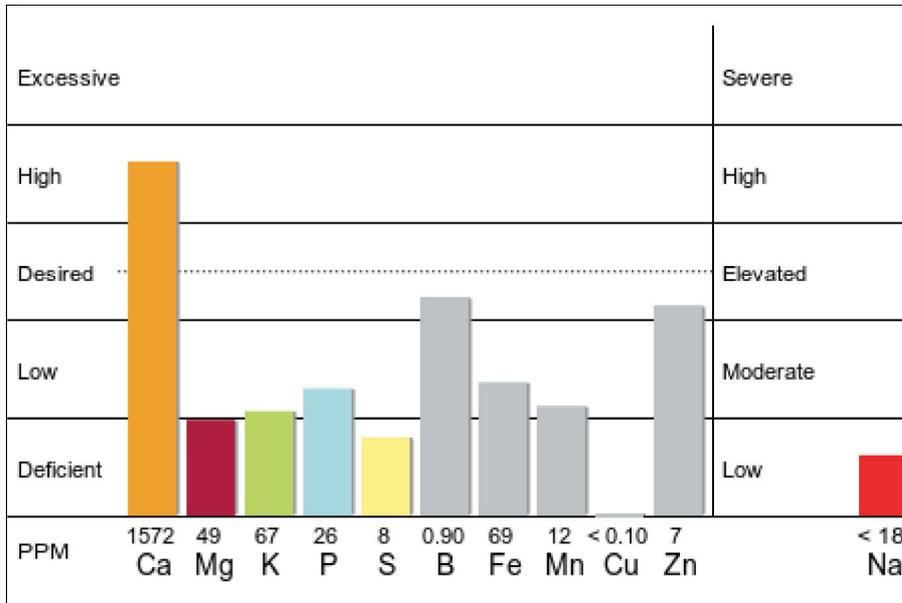
Soil Analysis

Conducted by The Ninemire Group LLC

Client: Rehoboth Christian College
Field Representative: Josh Walker
Date of Analysis: June 28, 2017



SOIL NUTRIENT STATUS: GYM LAWN OVAL



Organic Matter (humus) 1.2%
pH (H₂O 1:5) 8
Conductivity (mmhos/cm) 0.06
Total Exchange Capacity 8.9

BASE SATURATION: KEY ELEMENTS

Actuals	Actual Saturation	Ideal Saturation	Ideals
Ca 88.49%			68-72% Ca
Mg 4.56%			13-16% Mg
K 1.94%			3-5% K
Na 0.62%			<3% Na
H 0.0%			4.50% H
Other 4.4%			5% Other

COMMENTS

These numbers are to correct soil deficiencies only. Nutrient losses such as leaching or plant uptake should be considered when formulating maintenance programs.

Kg per Ha of Calcium deficient	0	
Kg per Ha of Magnesium deficient	161	Apply a total of 9.5 Kg per 100 m ² of a 17% Mg material over an appropriate number of applications.
Kg per Ha of Potassium deficient	108	Apply a total of 2.6 Kg per 100 m ² of a 0-0-42 material over an appropriate number of applications.
Kg per Ha of Phosphorus deficient	36	Apply a total of 1.6 Kg per 100 m ² of a 11-22-0 material over an appropriate number of applications.

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28 June 2017

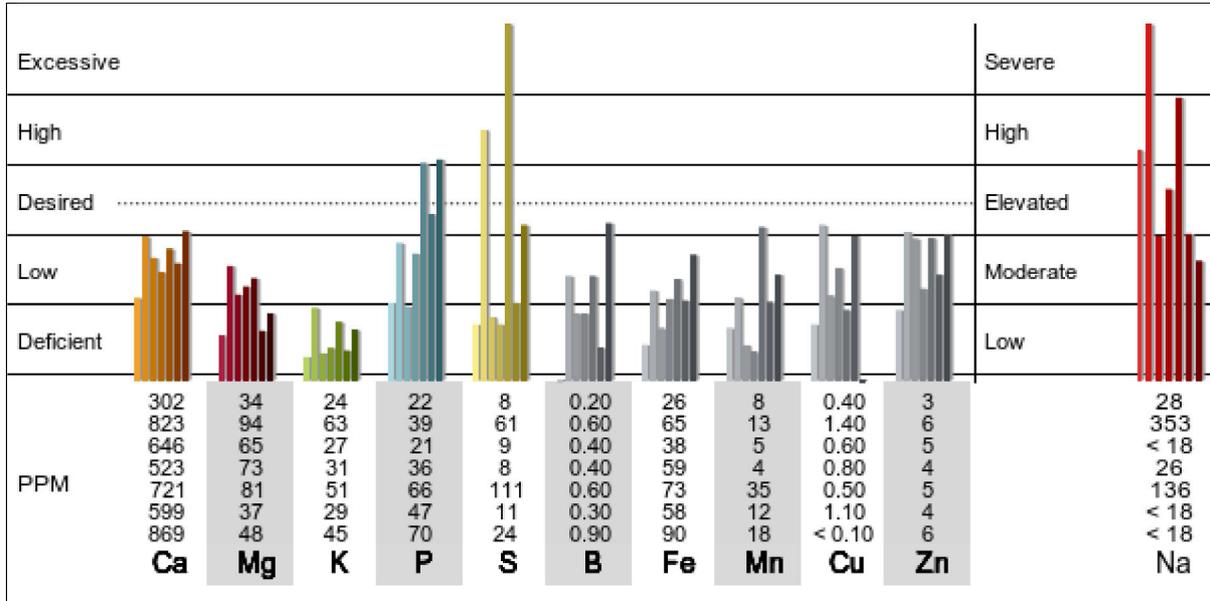
Soil Comparison

Conducted by The Ninemire Group LLC

Client: Rehoboth Christian College
Field Representative: Josh Walker
Date of Analysis: May 28, 2012



COMPARISON CHART



KEY ELEMENTS

	IDEAL	MAIN OVAL 2012-05-28	MAIN OVAL 2014-01-22	MAIN OVAL 2014-09-22	MAIN OVAL 2015-09-22	MAIN OVAL 2016-03-08	MAIN OVAL 2016-11-20	MAIN OVAL 2017-06-28
Organic Matter (humus)		1.10	1.30	1.60	1.90	1.80	1.70	2.10
pH		6.20	7.00	7.00	7.50	6.20	6.90	6.60
Total Exchange Capacity		2.40	6.90	4.10	3.60	6.00	3.70	5.50
Ca	68-72%	63.38%	59.68%	78.64%	73.26%	59.85%	81.36%	78.96%
Mg	13-16%	11.92%	11.31%	13.16%	16.93%	11.26%	8.28%	7.25%
K	3-5%	2.57%	2.32%	1.70%	2.22%	2.18%	1.99%	2.12%
Na	<3%	5.08%	22.28%	1.62%	3.20%	9.84%	1.73%	1.35%
H	4.50%	11.85%	0.00%	0.45%	0.00%	11.70%	2.10%	5.55%
Other	5%	5.19%	4.40%	4.43%	4.40%	5.18%	4.54%	4.77%

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28 May 2012

Appendix 3: ALS Environmental Groundwater Certificate of Analysis

CERTIFICATE OF ANALYSIS

Work Order : **EP1705529**
Client : **NATURAL AREA CONSULTING**
Contact : SUE BRAND
Address : 99C LORD STREET
 WHITEMAN WESTERN AUSTRALIA 6068
Telephone : 08 9209 2767
Project : Rehoboth Christian College
Order number : ----
C-O-C number : ----
Sampler : Sharon Hynes
Site : Rehoboth Christian College, 92 Kenwick Road, Kenwick
Quote number : EP/660/17
No. of samples received : 3
No. of samples analysed : 3

Page : 1 of 3
Laboratory : Environmental Division Perth
Contact : Customer Services EP
Address : 10 Hod Way Malaga WA Australia 6090

Telephone : +61-8-9209 7655
Date Samples Received : 25-May-2017 16:15
Date Analysis Commenced : 26-May-2017
Issue Date : 01-Jun-2017 14:12



This report supersedes any previous report(s) with this reference. Results apply to the sample(s) as submitted. This document shall not be reproduced, except in full.

This Certificate of Analysis contains the following information:

- General Comments
- Analytical Results

Additional information pertinent to this report will be found in the following separate attachments: Quality Control Report, QA/QC Compliance Assessment to assist with Quality Review and Sample Receipt Notification.

Signatories

This document has been electronically signed by the authorized signatories below. Electronic signing is carried out in compliance with procedures specified in 21 CFR Part 11.

<i>Signatories</i>	<i>Position</i>	<i>Accreditation Category</i>
Canhuang Ke	Metals Instrument Chemist	Perth Inorganics, Malaga, WA
Tyrone Cole	Inorganics Preparation Supervisor	Perth Inorganics, Malaga, WA



General Comments

The analytical procedures used by the Environmental Division have been developed from established internationally recognized procedures such as those published by the USEPA, APHA, AS and NEPM. In house developed procedures are employed in the absence of documented standards or by client request.

Where moisture determination has been performed, results are reported on a dry weight basis.

Where a reported less than (<) result is higher than the LOR, this may be due to primary sample extract/digestate dilution and/or insufficient sample for analysis.

Where the LOR of a reported result differs from standard LOR, this may be due to high moisture content, insufficient sample (reduced weight employed) or matrix interference.

When no sampling time is provided, the sampling time will default 00:00 on the date of sampling. If no sampling date is provided, the sampling date will be assumed by the laboratory and displayed in brackets without a time component.

Where a result is required to meet compliance limits the associated uncertainty must be considered. Refer to the ALS Contact for details.

Key : CAS Number = CAS registry number from database maintained by Chemical Abstracts Services. The Chemical Abstracts Service is a division of the American Chemical Society.
LOR = Limit of reporting
^ = This result is computed from individual analyte detections at or above the level of reporting
ø = ALS is not NATA accredited for these tests.
~ = Indicates an estimated value.



Analytical Results

Sub-Matrix: GROUNDWATER (Matrix: WATER)				Client sample ID	MB1	MB2	MB3	----	----
Client sampling date / time				24-May-2017 08:00	24-May-2017 07:50	24-May-2017 07:30	----	----	
Compound	CAS Number	LOR	Unit	EP1705529-001	EP1705529-002	EP1705529-003	-----	-----	
				Result	Result	Result	----	----	
EA005P: pH by PC Titrator									
pH Value	----	0.01	pH Unit	8.03	7.88	7.40	----	----	
EA010P: Conductivity by PC Titrator									
Electrical Conductivity @ 25°C	----	1	µS/cm	8190	3710	4460	----	----	
EA025: Total Suspended Solids dried at 104 ± 2°C									
Suspended Solids (SS)	----	5	mg/L	818	<5	18000	----	----	
ED038A: Acidity									
Acidity as CaCO ₃	----	1	mg/L	42	12	65	----	----	
EG020F: Dissolved Metals by ICP-MS									
Aluminium	7429-90-5	0.01	mg/L	<0.01	<0.01	<0.01	----	----	
Arsenic	7440-38-2	0.001	mg/L	<0.001	<0.001	<0.001	----	----	
Iron	7439-89-6	0.05	mg/L	0.06	<0.05	<0.05	----	----	
EK055G: Ammonia as N by Discrete Analyser									
Ammonia as N	7664-41-7	0.01	mg/L	0.02	0.07	0.04	----	----	
EK057G: Nitrite as N by Discrete Analyser									
Nitrite as N	14797-65-0	0.01	mg/L	0.12	<0.01	<0.01	----	----	
EK058G: Nitrate as N by Discrete Analyser									
Nitrate as N	14797-55-8	0.01	mg/L	1.00	0.01	0.01	----	----	
EK059G: Nitrite plus Nitrate as N (NO_x) by Discrete Analyser									
Nitrite + Nitrate as N	----	0.01	mg/L	1.12	0.01	0.01	----	----	
EK061G: Total Kjeldahl Nitrogen By Discrete Analyser									
Total Kjeldahl Nitrogen as N	----	0.1	mg/L	0.6	0.4	38.0	----	----	
EK062G: Total Nitrogen as N (TKN + NO_x) by Discrete Analyser									
^ Total Nitrogen as N	----	0.1	mg/L	1.7	0.4	38.0	----	----	
EK067G: Total Phosphorus as P by Discrete Analyser									
Total Phosphorus as P	----	0.01	mg/L	0.09	0.02	2.68	----	----	

CERTIFICATE OF ANALYSIS

Work Order : **EP1714227**
Client : **NATURAL AREA CONSULTING**
Contact : SUE BRAND
Address : 99C LORD STREET
 WHITEMAN WESTERN AUSTRALIA 6068
Telephone : 08 9209 2767
Project : Rehoboth Christian College
Order number : ----
C-O-C number : ----
Sampler : SUE BRAND
Site : Rehoboth Christian College
Quote number : EP/660/17
No. of samples received : 1
No. of samples analysed : 1

Page : 1 of 3
Laboratory : Environmental Division Perth
Contact : Customer Services EP
Address : 10 Hod Way Malaga WA Australia 6090
Telephone : +61-8-9209 7655
Date Samples Received : 15-Dec-2017 11:30
Date Analysis Commenced : 15-Dec-2017
Issue Date : 22-Dec-2017 17:15



This report supersedes any previous report(s) with this reference. Results apply to the sample(s) as submitted. This document shall not be reproduced, except in full.

This Certificate of Analysis contains the following information:

- General Comments
- Analytical Results

Additional information pertinent to this report will be found in the following separate attachments: Quality Control Report, QA/QC Compliance Assessment to assist with Quality Review and Sample Receipt Notification.

Signatories

This document has been electronically signed by the authorized signatories below. Electronic signing is carried out in compliance with procedures specified in 21 CFR Part 11.

<i>Signatories</i>	<i>Position</i>	<i>Accreditation Category</i>
Canhuang Ke	Metals Instrument Chemist	Perth Inorganics, Malaga, WA
Jeremy Truong	Laboratory Manager	Perth Inorganics, Malaga, WA



General Comments

The analytical procedures used by the Environmental Division have been developed from established internationally recognized procedures such as those published by the USEPA, APHA, AS and NEPM. In house developed procedures are employed in the absence of documented standards or by client request.

Where moisture determination has been performed, results are reported on a dry weight basis.

Where a reported less than (<) result is higher than the LOR, this may be due to primary sample extract/digestate dilution and/or insufficient sample for analysis.

Where the LOR of a reported result differs from standard LOR, this may be due to high moisture content, insufficient sample (reduced weight employed) or matrix interference.

When sampling time information is not provided by the client, sampling dates are shown without a time component. In these instances, the time component has been assumed by the laboratory for processing purposes.

Where a result is required to meet compliance limits the associated uncertainty must be considered. Refer to the ALS Contact for details.

Key : CAS Number = CAS registry number from database maintained by Chemical Abstracts Services. The Chemical Abstracts Service is a division of the American Chemical Society.
LOR = Limit of reporting
^ = This result is computed from individual analyte detections at or above the level of reporting
ø = ALS is not NATA accredited for these tests.
~ = Indicates an estimated value.



Analytical Results

Sub-Matrix: GROUNDWATER (Matrix: WATER)		Client sample ID			MB1	----	----	----	----
Client sampling date / time		15-Dec-2017 08:00			----	----	----	----	----
Compound	CAS Number	LOR	Unit	EP1714227-001	-----	-----	-----	-----	-----
				Result	----	----	----	----	----
EA005P: pH by PC Titrator									
pH Value	----	0.01	pH Unit	7.77	----	----	----	----	----
EA010P: Conductivity by PC Titrator									
Electrical Conductivity @ 25°C	----	1	µS/cm	5910	----	----	----	----	----
EA025: Total Suspended Solids dried at 104 ± 2°C									
Suspended Solids (SS)	----	5	mg/L	56	----	----	----	----	----
ED038A: Acidity									
Acidity as CaCO3	----	1	mg/L	29	----	----	----	----	----
EG020F: Dissolved Metals by ICP-MS									
Aluminium	7429-90-5	0.01	mg/L	<0.01	----	----	----	----	----
Arsenic	7440-38-2	0.001	mg/L	<0.001	----	----	----	----	----
Iron	7439-89-6	0.05	mg/L	<0.05	----	----	----	----	----
EK055G: Ammonia as N by Discrete Analyser									
Ammonia as N	7664-41-7	0.01	mg/L	0.03	----	----	----	----	----
EK057G: Nitrite as N by Discrete Analyser									
Nitrite as N	14797-65-0	0.01	mg/L	0.06	----	----	----	----	----
EK058G: Nitrate as N by Discrete Analyser									
Nitrate as N	14797-55-8	0.01	mg/L	0.54	----	----	----	----	----
EK059G: Nitrite plus Nitrate as N (NOx) by Discrete Analyser									
Nitrite + Nitrate as N	----	0.01	mg/L	0.60	----	----	----	----	----
EK061G: Total Kjeldahl Nitrogen By Discrete Analyser									
Total Kjeldahl Nitrogen as N	----	0.1	mg/L	0.8	----	----	----	----	----
EK062G: Total Nitrogen as N (TKN + NOx) by Discrete Analyser									
^ Total Nitrogen as N	----	0.1	mg/L	1.4	----	----	----	----	----
EK067G: Total Phosphorus as P by Discrete Analyser									
Total Phosphorus as P	----	0.01	mg/L	0.07	----	----	----	----	----